

CFS Voluntary Guidelines on Food Systems for Nutrition (VGFSyN)

Draft for Negotiations

PART 1 - INTRODUCTION

1.1 BACKGROUND AND RATIONALE

1. **Malnutrition in all its forms** – undernutrition, micronutrient deficiencies, overweight, and obesity – is one of the major challenges that countries face and is a result of food insecurity¹, along with many other factors and causes. Malnutrition, in at least one of its forms, affects every country in the world and most countries are affected by multiple forms. The impacts of malnutrition have profound consequences on people’s health and wellbeing, physical and cognitive development, and livelihoods throughout their lifetime and across generations. Malnutrition is a major impediment to the progressive realization of the right to adequate food in the context of national food security and the implementation of the 2030 Agenda for Sustainable Development.

2. Malnutrition in all its forms is associated with various forms of ill health and increased mortality.

Undernutrition is a major cause of death among children under the age of five years, increases the susceptibility to infectious diseases and risk of non-communicable diseases (NCDs) in adulthood.

Wasting, also known as acute malnutrition, poses a significant risk of increased morbidity and mortality in children. Stunting, also known as chronic malnutrition, is associated with delays in both physical growth and cognitive development.

¹ “Food security exists when all people, at all times, have physical, economic and social access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life”. FAO, 1996. Rome Declaration on World Food Security and World Food Summit Plan of Action.

3. **Micronutrient deficiencies** related to the inadequate intake of food rich in iron, vitamin A, iodine, folate, vitamin D, and zinc, among others, affect a large proportion of the global population with serious consequences on health, well-being, and development. Children under the age of five years, adolescent girls, women of childbearing age, and pregnant and lactating women have specific nutritional requirements across their lifecycle and are susceptible to a higher risk of anaemia, in particular iron deficiency anaemia. Also referred to as “hidden hunger,” micronutrient deficiencies increase a person’s vulnerability to infection, birth defects, impaired development, and lower life expectancy.

4. **Overweight and obesity** represent major risk factors globally for diet-related NCDs such as some forms of cancer, cardiovascular disease, and diabetes. While undernutrition and micronutrient deficiencies are still the main forms of malnutrition among children under the age of five years globally, overweight and obesity are increasingly prevalent among young and school-aged children, adolescents and adults.

5. The heavy **social and economic impacts of malnutrition in all its forms** are transmitted across generations. Undernourished mothers are more likely to have low-birth-weight babies putting them at an increased risk of becoming undernourished as children into adulthood as well as overweight and obese as adults. Maternal obesity poses short- and long-term risks for maternal and child health including poor cognition and increased risk of neurodevelopment disorders early in life, as well as an increased susceptibility to obesity and NCDs in adult life. Malnutrition in children results in reduced stature, diminished physical and mental health, poor school performance, reduced economic productivity and opportunities, and increased vulnerability to NCDs and other chronic diseases. These diseases lead to early death and increased morbidity and disability and require higher spending on health care, placing significant burdens on national health care systems and economies.

6. Malnutrition in all its forms has many **interrelated and underlying causes** that need to be addressed simultaneously. Among them, the lack of stable access to safe food and healthy diets, inadequate infant and young child-caring and feeding practices, poor sanitation, hygiene and safe drinking water, insufficient access to quality education and health services, low socioeconomic status, and marginalization. Basic causes of poor nutrition encompass the societal structures and processes that slow down the realization of human rights and perpetuate poverty, limiting or denying the access of vulnerable populations to essential resources for achieving optimal nutrition and health.

7. **Poverty and inequality** are important underlying causes of hunger and malnutrition in all its forms. Low employment rates, wages, incomes, and purchasing power have negative consequences on nutrition and health outcomes. Negative economic trends limit the capacity of national governments to deliver essential social services and health care to their citizens. In this context, inequality in income and asset distribution as well as in access to nutrition-relevant services contributes to marginalization and social exclusion, and further increases vulnerability to malnutrition.

8. **Those most affected by malnutrition in all its forms** typically include people with increased nutrient requirements and those who have less control over their dietary choices, including young and school-aged children, adolescents, pregnant and lactating women, the elderly, and people with disabilities. In addition, Indigenous Peoples, peasants, urban and rural poor, agriculture workers, upland and remote communities, migrants, refugees and displaced people are particularly vulnerable to malnutrition because of their persistent or temporary poverty.

9. **Complex and protracted crises**² also have short, medium and long-term adverse consequences on the nutritional status of impacted populations, particularly pregnant and lactating women and children under five. Conflicts, fragility, and susceptibility to climate-related disasters pose a major threat to the ability of food systems to deliver healthy diets and to the implementation of the 2030 Agenda for Sustainable Development as a whole.

10. **Climate change, agriculture³, and nutrition are interconnected.** Climate change affects temperature and precipitation, as well as the frequency and severity of extreme weather events. Increases in temperature, heat waves, and droughts impact agriculture, with the largest effects being decreased crop yields and livestock productivity, as well as declines in fisheries and agroforestry in areas already vulnerable to food insecurity. Climate change also impacts food

quantity, quality, safety and ultimately food prices, with significant implications for the availability of healthy diets. At the same time, agriculture and food production are major contributors to greenhouse gas emissions and account for large portions of the planet's land and fresh-water use.

COMMENT: The last sentence implies that all types of agri-food production contribute to green gas emissions. FAO's members agreed that some types of agri-food are sustainable, including from the environmental dimension.

11. **Unhealthy diets** have become a major risk factor of multiple forms of malnutrition and health outcomes globally. Global dietary patterns have been changing, affecting people across all parts of the world. In many regions of the world, dietary changes are shifting towards the consumption of convenient food and beverages with high content in sugar and/or in saturated fat, salt which are associated with an increased prevalence of overweight, obesity and NCDs. Profound dietary changes are occurring for several reasons, including the movement of people to urban places, the influence of globalization and trade within the food system, the continued loss of access to traditional diets, and changing lifestyles.

COMMENT: We would like to highlight that not necessarily dietary changes have negative impacts. For instance, international trade can facilitate access to healthy products which are not produced in certain regions of the world.

Moreover, we would like further clarifications related to the reasons why traditional diets are more likely to be associated to healthy dietary consumption patterns, as this may not always be the case.

12. **Food systems**⁴ are complex webs of activities and actors involving the production, processing, handling, preparation, storage, distribution, consumption and ultimately waste of food. They are constantly being shaped by different forces, drivers and decisions by many different individuals. Every food system has the capacity to be equitable and to produce healthy diets needed for optimal nutrition.

But, they can also be shaped by power concentration and imbalances, which may not be inclusive and equitable. Some food systems are sustainable while others should be improved, as appropriate and taking into consideration national circumstances, to be sustainable show their limits in terms of sustainability and inefficiency in their use of natural resource utilization, and in the use of labour and energy, to avoid leading to environmental degradation, water pollution, and loss of biodiversity as well as to excessive food consumption and food waste patterns, among other effects.

COMMENT: Firstly, we highly appreciate the reference to the sustainability of some food systems as it recognizes that not all food systems should be transformed in order to be sustainable. From this perspective, and consistent with previous comments submitted by Argentina, we would appreciate it if references to the "transformation of food systems" could be eliminated throughout the text of the Voluntary Guidelines. If not possible, a reference to what was agreed upon in last December FAO Council meeting should be included, as it is also aligned with the aforementioned statement on the sustainability of some current food systems.

Secondly, and as regards to the reference to the limitations some food systems may show, we highlight that there are no internationally agreed criteria on those concepts. In particular, there is no consensus regarding what “*limits of sustainability or levels of efficiency expected in the use of natural resources*” would be. Likewise, it is considered difficult to universalize measures in this sense, given the diversity of ecosystems, climates, social, economic situations, capacities and needs of the countries.

Additionally, the wording included at the end of the paragraph aims at recognizing the wide array of consequences that unsustainable food systems may have, which might be reflected in all three dimensions of sustainable development (economic, social and environmental).

13. The **functionality of food systems** and their ability to deliver healthy diets is influenced by a number of drivers which indicate that, in order to improve nutrition, context specific changes are needed not only in agriculture and food policies, but also across multiple sectors and policy areas that address, for example, national development priorities, economic policies, and social norms.

14. ~~Transforming-Ensuring food systems~~ and promoting sustainable food systems that meet the dietary needs of populations require **institutional and behavioural changes** among all food system actors. Food system-related policies need to focus on their economic, social, environmental, cultural, nutritional, and health consequences, paying special attention to the poorest and most vulnerable to malnutrition and addressing barriers they face in accessing food for healthy diets.

COMMENT: The wording suggested is aligned with previous comments on the “transformation” of food systems, as well as with language agreed upon under the 2030 Agenda and its SDG 2.4.

15. **Changes in governance** are needed within and across food systems, and its constituent elements, namely food supply chains⁷, food environments⁸, consumer behaviour⁹ to generate positive outcomes along the three dimensions of ~~sustainability~~ **sustainable development** – social, economic, and environmental.

COMMENT: We suggest sticking to the language of the 2030 Agenda.

16. **Coordination processes** are required to **address policy fragmentation** across sectors such as health, agriculture, education, environment, water, sanitation, gender, social protection, trade, employment, and finance – all of which impact nutrition outcomes.

17. The Committee on World Food Security (CFS) has undertaken a policy process to produce

Voluntary Guidelines on Food Systems for Nutrition (VGFSyN). The preparation of the VGFSyN is informed by the findings and scientific evidence provided in the [High Level Panel of Experts on Food Security and Nutrition’s \(HLPE\)¹⁰ Report on Nutrition and Food Systems](#), additional literature as well as a consultation process that took place between May and November 2019 which involved the participation of CFS stakeholders in meetings in Italy, Ethiopia, Thailand, Hungary, Egypt, Panama, and the United States of America, as well as through an electronic consultation.

18. This policy process is taking place at the same time as a variety of organizations from different sectors are addressing malnutrition. Food systems and nutrition have received **increased attention from the global community**, including the United Nations (UN) and its Member States, and are recognized as essential co-determinants for achieving the goals of the 2030 Agenda for Sustainable Development. In 2014, at the Second International Conference on Nutrition (ICN2), members of the Food and Agriculture Organization (FAO) and the World Health Organization (WHO) committed to ending hunger and malnutrition in all its forms¹¹. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025)¹² 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 the CFS. In 2017, the UNGA proclaimed the United Nations Decade of Family Farming (2019- 2028)¹³. Specific attention to nutrition has been given by a number of UNGA Resolutions¹⁴, the UN Economic and Social Council (ECOSOC)¹⁵, the UN Environment Assembly¹⁶, the World Health Assembly (WHA)¹⁷ and the UN Special Rapporteur on the Right to Food¹⁸.

19. The VGFSyN are expected to contribute to and complement these international initiatives with a view to **promoting policy coherence**. They provide evidence-based guidance to help countries operationalize ICN2’s Framework for Action¹⁹ recommendations in support of the progressive realization of the right to adequate food in the context of national food security and of the right to health, and of the achievement of Sustainable Development Goal (SDG) 2²⁰, with particular attention to targets 2.1²¹, 2.2²² and 2.4²³. In addition, the VGFSyN should play an essential role in assisting countries to achieve other related SDGs (SDG 1, 3, 4, 5, 6, 8, 10, 12).

1.2 KEY CONCEPTS

20. **Healthy diets** are those diets that are of adequate quantity and quality to achieve optimal growth and development of all individuals and support functioning and physical, mental and social wellbeing at all life stages. They help to protect against malnutrition in all its forms, including undernutrition, micronutrient deficiency, overweight and obesity) as well as NCDs, such as diabetes, heart disease, stroke and cancer. The exact make-up of healthy diets varies depending on individual characteristics (e.g. age, gender, lifestyle and degree of physical activity), cultural context, local availability of foods and dietary customs. They are diversified, balanced, and safe and should limit the

¹¹ FAO/WHO. 2014. ICN2, [Rome Declaration on Nutrition](#).

¹² UNGA Resolution [A/RES/70/259](#) - The Work Programme of the UN Decade of Action on Nutrition

¹³ [UNGA Resolution A/RES/72/239](#).

¹⁴ UNGA Resolutions [A/RES/73/2](#), [A/RES/73/132](#), and [A/RES/73/253](#).

¹⁵ [Ministerial Declaration of the 2018 High-Level Political Forum on Sustainable Development](#)

¹⁶ [Ministerial Declaration of the 2019 United Nations Environment Assembly](#)

¹⁷ The World Health Assembly has endorsed the [Comprehensive implementation plan for maternal, infant and young child nutrition](#), and the [WHO Global action plan for the prevention and control of noncommunicable diseases 2013-2020](#), which delineate policy options for the prevention of malnutrition in all its forms and the promotion of healthy diets.

¹⁸ [A/71/282 “Interim report of the Special Rapporteur on the right to food”](#)

¹⁹ FAO/WHO. 2014. ICN2, [Framework for Action](#).

²⁰ SDG 2, *“End hunger, achieve food security and improved nutrition and promote sustainable agriculture”*.

²¹ Target 2.1, *“By 2030 end hunger and ensure access by all people, in particular the poor and people in vulnerable situations including infants, to safe, nutritious and sufficient food all year round”*.

²² Target 2.2, “By 2030, end all forms of malnutrition, including achieving, by 2025, the internationally agreed targets on stunting and wasting in children under 5 years of age, and address the nutritional needs of adolescent girls, pregnant and lactating women and older persons”.

²³ Target 2.4, “By 2030, ensure sustainable food production systems and implement resilient agricultural practices that increase productivity and production, that help maintain ecosystems, that strengthen capacity for adaptation for climate change, extreme weather, drought, flooding and other disasters and that progressively improve land and soil quality”.

intake of saturated and trans fats, added sugars, and sodium. Healthy dietary practices start early in life – breastfeeding fosters healthy growth and improves cognitive development and may have long-term health benefits²⁴.

21. ~~Sustainable healthy diets are healthy diets that combine all the dimensions of sustainability to avoid unintended consequences and undermine healthy diets of future generations. They contribute to the preservation of biodiversity and have a low environmental pressure and impact²⁵.~~

COMMENT: We recall previous comments made in relation to the inclusion of the concept “sustainable healthy diets” and we highlighted that the FAO Council itself in its 163rd Session recalled the terminology within the United Nations - in particular of the Second International Conference on Nutrition (ICN2) jointly organized by FAO and the World Health Organization (WHO) - and stressed the need for harmonization with the agreed UN language. From that perspective, we strongly suggest avoiding the inclusion of non multilaterally agreed terminology.

22. **Nutritious foods** are those foods that ~~are tend to be~~ *high* in essential nutrients such as vitamins and minerals (micronutrients), as well as proteins, unrefined carbohydrates such as fibre, and/or unsaturated fats and are low in sodium, added sugars, saturated fats and trans fats.

COMMENT: We would appreciate clarifications on the reference to “tend to be” as it may imply that certain foods can be nutritious in some cases but not in others.

23. **The right to adequate food** is realized when every man, woman and child, alone or in community with others, have the physical and economic access at all times to adequate food or means for its procurement. The right to adequate food implies the availability of food in a quantity and quality sufficient to satisfy the dietary needs of individuals, free from adverse substances and acceptable within given culture. ²⁶.

PART 2 – OBJECTIVES AND GUIDING PRINCIPLES

2.1 OBJECTIVES AND PURPOSE

24. The **objective of the VGFSyN** is to contribute to transforming ~~as appropriate food systems~~²⁷ and promoting sustainable food systems to ~~ensure guarantee~~ that the food that contributes to ~~sustainable~~ healthy diets is available, affordable, accessible, safe, and of adequate quantity and quality while conforming “with beliefs, culture and traditions, dietary habits, and preferences of individuals, in accordance with national and international laws and obligations”²⁸.

COMMENT: We suggest to include “as appropriate” to reflect what FAO Council Members’ agreed last December, taking into consideration that not all food systems should be transformed to be sustainable.

25. The VGFSyN follow a **comprehensive, systemic, and science- and evidence-based approach** to addressing policy fragmentation with a special emphasis on the food, agriculture, and health sectors, while also addressing social, environmental and economic sustainability issues. The VGFSyN provide guidance on effective policies, investments and institutional arrangements. The VGFSyN are expected to address the diversity and complexity of food systems with the intention of promoting policy coherence, considering benefits and trade-offs, and fostering and guiding dialogue among different institutions and sectors.

COMMENT: We would appreciate clarifications on the difference between science-based and evidence-based approaches. On which grounds would the evidence-based approach be supported?

²⁴ Adapted from WHO healthy diet: www.who.int/news-room/fact-sheets/detail/healthy-diet

²⁵ Adapted from [FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome](#)

²⁶ The definition of the right to adequate food is given by [the Committee on Economic Social and Cultural Rights \(CESCR\) which, through the general comment 12](#), is interpreting Article 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR).

²⁷ [UNGA Resolution A/RES/74/242](#). Paragraph 40.

²⁸ [FAO/WHO. 2014. ICN2, Rome Declaration on Nutrition](#). Paragraph 5.b.

26. The VGFSyN are intended to be global in scope and to provide **guidance to policy-makers and relevant stakeholders** when designing context-specific policies, laws, regulatory frameworks, strategies, plans and programmes. They take into consideration different national realities, capacities, and levels of development, as well as different types of food systems and the many drivers impacting them.

27. These VGFSyN take **evidence** from a range of rigorous studies, [best-good](#) practices, and world experience - at municipal, at sub-national, and at national levels - and apply the evidence through a broad lens.²⁹ Much of the evidence in the VGFSyN comes from the HLPE 2017 report, various UN technical documents, and peer-reviewed scientific literature.

COMMENT: We prefer the reference to “good practices” as this concept avoids the inclusion of “one-size-fits-all” solutions that may not be suitable taking into account the different conditions and circumstances under which food systems take place. The reference to “good-practices” allows the inclusion of wider variety of experiences that may have had positive effects when implemented in certain contexts and production conditions.

2.2 NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS

28. The VGFSyN are non-binding and should be **interpreted and applied consistently with existing obligations** under relevant national and international law, including the [Universal](#)

[Declaration of Human Rights \(1948\)](#) and other agreed international human rights instruments, and with due regard to voluntary commitments under applicable international and regional instruments. CFS guidance should build upon and integrate existing instruments and frameworks for action adopted in the context of the UN system, guidance, and recommendations endorsed by Member States.

29. The VGFSyN are intended to **avoid duplication of the work and mandate of other international bodies**, and build upon and complement related guidance contained in other CFS products with specific attention paid to:

- [Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of the national food security \(2004\)](#),
- [CFS Voluntary Guidelines on the responsible governance of tenure of land, fisheries and forests in the context of national food security – VGGT \(2012\)](#),
- [CFS Principles for responsible investment in agriculture and food systems – RAI \(2014\)](#),
- [CFS Policy Recommendations on Food losses and waste in the context of sustainable food systems \(2014\)](#),
- [CFS Framework for Action for food security and nutrition in protracted crises – FFA \(2015\)](#),
- [CFS Policy Recommendations on Water for food security and nutrition \(2015\)](#),
- [CFS Policy Recommendations on Connecting smallholders to markets \(2016\)](#), and

²⁹ Because situations can vary widely, the generalizability of evidence to other situations is absolutely crucial, but not always available, for food system actions that address diets and nutrition. Additional research designs are needed to contribute to the evidence-base of policymaking. The VGFSyN bring together evidence from different methodologies: some of which is experiential that holds promise for real-world relevance, some comes from the evaluation of programmes and policies that provide guidance on implementation in specific settings and contexts.

- [CFS Policy Recommendations on Sustainable agricultural development for food security and nutrition: what roles for livestock? \(2016\)](#).

30. The VGFSyN are **primarily targeted at governmental actors** to help them develop holistic and inclusive public policies. They are also to be used in policy discussions and implementation processes by relevant stakeholders such as:

- a) Governmental actors, including relevant ministries and national, sub-national, and local institutions, and parliamentarians;
- b) Intergovernmental and regional organizations, including specialized UN agencies;
- c) Civil society and non-governmental organizations, including those representing Indigenous Peoples, vulnerable groups and communities, and smallholders, fisherfolks, pastoralists, landless and workers;
- d) Farmer organizations and their networks;

- e) Private sector actors, including agribusiness, food and beverage manufacturers, food retailers including supermarkets, food service providers, industry trade associations, food wholesalers, food distributors, importers and exporters, and the advertising and marketing industry³⁰;
- f) Research organizations, academic institutions, and universities;
- g) Development partners, including international financial institutions;
- h) Private donors, foundations, and funds;
- i) Consumer associations.

2.3 GUIDING PRINCIPLES FOR TRANSFORMING ~~–AS APPROPRIATE–~~ FOOD SYSTEMS OR PROMOTING SUSTAINABLE FOOD SYSTEMS

31. The VGFSyN include **five guiding principles**³¹ that emerged from the consultation process as foundational when considering the different actions that should be followed to contribute to transforming ~~–as appropriate– food systems~~ and promoting sustainable food systems that enable healthy diets.

32. These principles draw on the need to ensure **participation, accountability, non-discrimination, transparency, human dignity, empowerment and equality, and the rule of law** in order to contribute to the progressive realization of the right to adequate food in the context of national food security.

a) **Systemic, multisectoral, science- and evidence-based approach.** Promote a systemic, multisectoral, and science and evidence-based approach that considers food systems in their totality, integrates indigenous and traditional forms of knowledge, seeks to simultaneously maximize outcomes across all ~~sustainability_~~ dimensions of sustainable development, and looks at the multidimensional causes of malnutrition in all its forms.

³⁰ The private sector is made up of many different types of companies with a wide range of sizes, scales, human and financial resources, as well as varying reach into local, domestic and international markets.

³¹ These guiding principles are consistent with already agreed international documents and tools, such as the Rome Declaration on Nutrition and the Framework for Action of ICN2.

b) **Coherent and context-specific policies.** Contribute to the formulation and implementation of coherent and context-specific policies and related investment through coordinated actions among different actors and across all relevant sectors at international, regional, national, subnational, and local levels.

c) **Accountability, transparency and participation.** Support efforts in strengthening governance and accountability mechanisms that contribute to fostering citizen participation in national debates on food security and nutrition and on food systems, and transparent and inclusive decision making processes, based on transparent rules of engagement including safeguards against potential conflicts of interest.

d) **Healthy people, healthy planet.** Promote policies and actions that enhance the livelihoods, health, and well-being of the population, as well as sustainable food production and consumption to ~~protect–avoid the long-term decline of~~ natural resources, ecosystems and biodiversity, and ensure mitigation of and adaptation to climate change.

COMMENT: Due consideration should be given to the notion that any policy that promotes changes in people's lifestyles must be nationally adapted, especially in terms of local culture and identity.

Additionally, it is suggested to replace the term “protect” (linked to conservation objectives) with by the reference to the notion included in CBD article 2 in terms that sustainable production and consumption avoid long-term degradation.

e) **Gender equality and women's empowerment.** Promote gender equality and women's and girls' empowerment, and respect, protect and fulfill their rights, creating the conditions for women's involvement in decision-making and strong engagement in shaping food systems that improve nutrition, recognizing their key role in care, education, agriculture, health promotion and food preparation and consumption, while promoting gender-equitable practices.

PART 3 - THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION

33. With the aim of ensuring the progressive realization of the right to adequate food in the context of national food security, the VGFSyN provide a framework to promote policy coherence and to bring various stakeholders who are involved in food systems to work together to ensure healthy diets for everyone.

34. To achieve the WHA and 2030 Agenda targets and national commitments to end malnutrition in all its forms, **a food system approach is needed** that recognizes that the various parts that make up food systems are interconnected; that any action or decision to address one aspect of a food system will likely impact other aspects, and that food systems respond and are impacted by other systems, situations, and contexts. Thinking systematically and interdisciplinary toward [ensuring sustainable food systems transformation](#) can [ensure-guarantee](#) that challenges are tackled from multiple perspectives. Thus, the VGFSyN provide guidance on a mix of regulatory, fiscal, and other policy actions spanning the diversity of food supply chains, food environment and consumer behavior, as well as the drivers and people that shape those actions.

35. These guidelines are structured around seven focus areas: i) transparent, democratic and accountable governance of food systems; ii) sustainable food supplies for improved diets and nutrition in the context of climate change; iii) equitable access to healthy diets delivered by sustainable food systems; iv) food safety across sustainable food systems; v) social relations, knowledge and culture of diets; vi) gender equality and women's empowerment across food systems; and vii) resilient food systems in humanitarian contexts.

COMMENT: The reference to “improved diets” is unclear, as States must focus on achieving “healthy diets”, as was agreed upon at the Second International Nutrition Conference (paragraph 13.b).

36. The HLPE report was structured around three main constituent elements of food systems³² and proposed a wide number of policy areas and drivers of change (See **Figure 1**). During the consultation process, CFS stakeholders identified a number of cross-cutting factors that are relevant for improving diets and nutrition and hence the origin of these seven focus areas. The first area, the governance of food systems, establishes the foundation of the remaining policy recommendations of the VGFSyN.

Governance, as a major driver in shaping food systems, is interweaved across the six other areas. Three areas cover the main components of food systems while an additional area is based on the recognition of the increased importance of collective action in addressing food safety. Special attention is focused on women because of the vital role they play in food systems. The humanitarian context serves as a standalone area because it will continue to be a significant global issue in the context of climate change, protracted crises, conflict and migration.

Figure 1: HLPE Food Systems Framework³³

³² Food supply chains, food environments and consumer behaviours

³³ HLPE 2017b

37. The guidance is principally addressed to governmental actors who should consider it in relation to national and sub-national priorities, needs and conditions, and assess the relevance of the policy entry points and actions as they pertain to their own food system contexts. It is important for countries to undertake a diagnostic lens to their food systems in a systematic and holistic way. This would entail understanding the types of food systems that exist, the make-up and complexity of their food systems and the major trigger points for change, disruption, exclusion/inclusion and growth. Governmental actors are encouraged to systemically analyze the potential transition costs, benefits, trade-offs, and impacts of their actions, considering their effects across sectors and actors within their own context of environmental, economic and socio-cultural conditions and objectives.

3.1 TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS

38. This section lays out the criticality of governance mechanisms, leadership and accountability across the range of actors, from global to local levels, within food systems. Governments are responsible for developing sound public policies, and regulatory and legislative frameworks that govern food systems, promote awareness, and set priorities for impactful action. Governments also need to manage conflicts of interests, power imbalances, and other safeguards to put public interests before other interests.

3.1.1 Promoting policy coherence by integrating nutrition into national development

a) Governmental actors should **foster policy coherence across sectors** to reduce all forms of malnutrition from a food system perspective. Governmental actors should prioritize sustainable food systems in order to effectively align relevant sectors around a common set of goals.

b) Governmental actors should **integrate sustainable food system actions** that promote healthy diets and nutrition into national and local development, health, economic, agricultural,

climate/environment, and disaster risk reduction plans. This integration should be complemented with **increased and improved budgetary allocations** to food system activities with clear objectives of improving diets and nutrition with indicators to track and assess the full cost accounting of addressing malnutrition in all its forms.

c) Governmental actors should **ensure that international and bilateral trade and investment agreements** are consistent with nutrition, food and agriculture national policies, and [multilaterally agreed international](#) food safety standards (e.g. Codex Alimentarius, ~~and~~ World Organization for Animal Health standards [and the International Plant Protection Convention](#)).

COMMENT: The reference to “international” standards may be imprecise. We prefer to quote them as “multilaterally agreed standards” so it is clear that the Guidelines refer to those safety standards adopted by the International Organizations recognized by the WTO SPS Agreement (Codex, IPPC and OIE, as appropriate).

d) Governmental actors and intergovernmental organizations should identify opportunities within food systems to **achieve national and global food security and nutrition goals, targets, and indicators** set out by the WHA and the 2030 Agenda for Sustainable Development.

3.1.2 Strengthening multisectoral coordination and actions

a) Governmental actors, intergovernmental organizations and development partners should work to [improve-promote healthy diets and nutrition across sectors, ministries, and agencies at all levels](#) through strengthened legal frameworks and institutional capacities that address the multiple causes and consequences of malnutrition in all its forms. This coordination should **establish and/or strengthen multisectoral, multistakeholder mechanisms** that oversee the design and implementation of evidence- and science-based policies, strategies, and interventions that contribute to [healthy diets](#) and nutrition outcomes from national to local levels, adopted in accordance with multilaterally agreed rules.

COMMENT: Suggested language is in line with the Rome Declaration on Nutrition as well as with the language used further on the text of these Voluntary Guidelines (e.g subparagraph 3.1.2 c).

b) Governmental actors should **facilitate an inclusive and transparent dialogue** ensuring the participation of a range of stakeholders working with or in food systems, including civil society organizations, the private sector, intergovernmental and regional organizations, Indigenous Peoples, youth, consumer and farmer associations, donors, and development partners. This dialogue should include all dimensions of food systems, as well as the protection of natural resources and the environment, social cohesion and inclusion.

c) Governmental actors, intergovernmental organizations, and civil society organizations should **encourage increased commitment to action with responsible investments**⁴ from the public sector, private sector actors, and donors to [support-ensure](#) sustainable food systems that promote healthy diets, while considering trade-offs with other policy priorities.

3.1.3 Creating accountability mechanisms, monitoring and evaluation

a) Governmental actors should establish or strengthen regulatory and legislative frameworks to govern private and public sector activities related to food systems. They should **institute robust, transparent accountability mechanisms** that promote good governance, public deliberation, independent bodies that monitor compliance and performance, individual complaint procedures, remedial actions to improve accountability, systematic management of conflicts of interest and vested interests, power imbalances, and capacity to settle disputes that may undermine public health. Governmental actors should ensure that dialogue with the private sector is transparent and follows clear roles and responsibilities for engagement to safeguard the public interest, [in line with multilaterally agreed rules](#).

COMMENT: Though we recognize the important role that the private sector might have in relation to food systems, we believe that it is necessary to reaffirm the obligations that Governments have assumed multilaterally. This means that any action performed by the private sector must be in line with those commitments States have multilaterally made.

b) Governmental actors, in partnership with research organizations and intergovernmental organizations, should improve the availability and quality of **multisectoral information systems and national surveillance systems** that capture, harmonize and disaggregate data and indicators across all aspects of food systems and outcomes related to food security, diets (particularly dietary intake and dietary quality), food composition, and nutrition (including the measurement of micronutrients and anthropometry) for improved policy development and accountability, and better targeting of public programmes.

c) Governmental actors, with the support of intergovernmental organizations, should **promote investment in human, system, and institutional capacity** to analyze food system information in a comprehensive manner to support the planning, monitoring, and evaluation of programmatic actions.

³⁴ In line with the CFS Principles for responsible investment in agriculture and food systems, RAI (2014).

3.2 SUSTAINABLE FOOD SUPPLIES FOR ~~IMPROVED~~ HEALTHY DIETS AND NUTRITION IN THE CONTEXT OF CLIMATE CHANGE

39. Food supply patterns play an important role in health and environmental sustainability. Food supplies - from production, storage, processing and packaging, and markets - operate at assorted scales, structures, and levels, from simple to highly complex and globalized supply chains involving many food system actors. This section complements the goals outlined in the UN Decade of Family Farming and highlights the importance of improving nutrition as food moves through the system, indicates which food system actors should be given special attention, and suggests ways to create resilient food supplies in the midst of climate change and natural resource degradation.

3.2.1 Prioritizing climate adaptation and mitigation across food supplies

a) Governmental actors (including national extension systems), development partners, NGOs, and private sector actors should **assist** farmers and other food producers to adapt to, and ensure food supply chains are resilient to, climatic shocks by managing risk and building preparedness and resilience. Assistance can include access to finance, insurance, forecasting data and methods, and

immediate help through service apps (e.g. to identify plant diseases and parasites). Assistance could also include protecting crops, livestock, and fisheries and overall production systems from the anticipated impacts of climate change in the form of pests, diseases, weather-related shocks, and adopting drought resistant varieties, as well as productive-asset creation initiatives (e.g. rehabilitating degraded land and infrastructure development).

COMMENT: In line with previous comments, we recall that private sector interventions in the food supply chain should respect multilaterally agreed rules. This is particularly important in the SPS field. Private sector interventions must not replace or undermine public authority's role in the protection of human, plant and animal health and lives, in line with the commitments made under the WTO SPS Agreement.

b) Government ~~sal should coordinate policies actors, intergovernmental organizations, NGOs, and private sector actors should support and assist farmers and other food producers to reduce the environmental impact~~ of food systems, ~~involving intergovernmental organization, NGOs and the private sector~~. This could be done by fostering the adoption of appropriate technology and onfarm management practices to improve crop yields and reduce pesticide usage. Governmental actors should promote optimization of agricultural outputs per unit of water, energy, and land, and reduce greenhouse gas emissions, biodiversity loss, and natural resource degradation of agriculture activities, as appropriate.

COMMENT: Governments are the actors that should coordinate policies to reduce the environmental impact of food systems, involving in that task the private sector, NGOs and intergovernmental organizations. Likewise, we believe that the specific beneficiaries of these policies should not be identified since those will depend on each country's productive system characteristics and it is impossible to make an exhaustive list.

Additionally, we suggest the inclusion of "as appropriate" at the end of the paragraph as we believe that suggested measures will depend on national productive conditions.

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c) Governmental actors should **institute surveillance systems** (including early warning systems), quality indices (e.g. integrated diversification and agro-biodiversity targets) and other food system and dietary metrics to monitor changing conditions and the effectiveness of policy responses, as appropriate.

COMMENT: This recommendation is extremely comprehensive, thus we suggest including "as appropriate" at the end of the paragraph.

d) Research organizations, academic institutions, and universities should promote the **generation and use of rigorous science and evidence** that demonstrate robust mitigation and resilience strategies to climate change for sustainable food systems and ~~sustainable~~ healthy diets.

Research should focus on potential interventions and policy entry points to ensure agricultural production, processing and packaging, retail and markets, and consumer demand contribute to support food producers in their efforts to adapt to climate change, mitigate their impact, and reduce natural resource degradation.

COMMENT: We would kindly appreciate further clarifications on the scope of the term “robust” and in particular, who would define what “robust” means and under which parameters.

Additionally, and as an alternative, we suggest the following wording for this paragraph: “*Climate change mitigation and adaptation strategies should be science based, and research organizations, academic institutions, and universities should contribute to the generation of said science and evidence. Research should focus on potential interventions and policy entry points to ensure agricultural production, processing and packaging, retail and markets, and consumer demand contribute to support food producers in their efforts to adapt to climate change, mitigate their impact, and reduce natural resource degradation*”.

3.2.2 Ensuring sustainable use and management of natural resources in food production

a) Governmental actors and farmers and their organizations should **address soil health** as central to agricultural production systems. Governmental actors should encourage the use of integrated soil fertility management practices to maintain and increase crop productivity in a sustainable way, and ~~provide appropriate incentives for~~ **promote** the use of sustainable land management services and agricultural practices to maintain soil biodiversity and nutrient balance and promote carbon storage.

COMMENT: we suggest deleting the reference to “incentives” since its scope is unclear.

b) Governmental actors should **improve the management and control of water resources** for agriculture and food production through improved regulation, community participatory approaches, and water stewardship approaches that involve civil society organizations, private sector actors, and other stakeholders.

c) Governmental actors should **foster the protection, conservation, and sustainable use of biodiverse, productive systems** that include diverse crops and livestock, neglected and underutilized species, forestry and plantations, fisheries and sustainable aquaculture as well as biodiverse landscapes including forests, water and coastal seas. This should be complemented through the adoption and application of sustainable food production and natural resource management practices including agroecological and other innovative approaches³⁵ in a manner that is economically viable for all legitimate tenure rights holders to uphold those rights and maintain livelihoods.

d) Governmental actors should **protect the rights of Indigenous Peoples, small-scale producers, peasants, and other communities** with customary tenure systems that exercise self-governance of land, fisheries and forests, to land, territories, and resources they have traditionally owned, occupied or otherwise used or acquired. Their livelihoods should be maintained, their traditional, collective knowledge and practices should be valued, their access to traditional food should be protected, and their diets, nutrition, and wellbeing should be prioritized.

3.2.3 Promoting nutrition within agriculture and food production

a) Governmental actors should **integrate nutrition objectives into their national agriculture policies**.

b) Governmental actors, private sector actors, development partners and donors should diversify agricultural investment and incentivize all types and sizes of producers to **adopt sustainable production practices and to produce diverse, nutritious crops and food** that contribute to healthy diets, while ensuring a decent income, livelihoods and resilience for farmers, particularly smallholders and/or family farms, and farm workers. This should include supporting and encouraging sustainable livestock, agroforestry, animal and fishery systems (including artisanal fisheries and aquaculture).

c) Governmental actors should **integrate urban and peri-urban agriculture** and urban land use into national and local agricultural development strategies, food and nutrition programmes, and

³⁵ HLPE. 2019. [Agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition](#). A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.

urban and territorial planning, as a viable input into healthy diets for growing urban populations and social cohesion of communities.

d) Governmental and private sector actors should ensure enabling environments to assist and ensure farmers and other food producers have **access to modern and sustainable technologies, technical assistance**, and nutrition information within agriculture and other extension technical packages, and provide skill training and capacity development to be able to use those technologies/assistance/information that could improve the production, safety, and nutritional quality of crops for markets.

e) To reduce excessive food price volatility, governmental actors should **promote market information systems** that provide timely, transparent information about food-related market transactions, with more emphasis on nutritious commodities and orphan crops, including enhanced tracking of current and future food supply stock and price data.

f) Governmental actors, private sector actors, donors and other relevant stakeholders should **invest in research, development, and innovation** for producing nutritious crops, such as fruit, vegetables, nuts and seeds, legumes, biofortified crops (developed through conventional onfarm breeding), and diverse animal-source food and breeding (e.g. dairy products, fish, eggs, and meat), which are developed keeping smallholder and/or family farmers' livelihoods in mind.

3.2.4 Improving food storage, processing, transformation and reformulation

a) Governmental actors, private sector actors, and donors should **invest in infrastructure** (e.g. storage facilities, roads and bridges, physical markets, market information systems) to prevent postharvest loss and ensure smallholder farmers and small and medium-size enterprises (SMEs) are able to deliver diverse, perishable, safe food to markets in sustainable ways.

b) Governmental actors, private sector actors, and farmers and their associations should **facilitate minimizing food and nutrient loss** on farms, during post-harvest storage, and throughout

processing, transportation, and retail (particularly perishable foods such as fruits, vegetables, dairy, eggs, fish and meat). Facilitation includes training and capacity on improved management practices and fostering the adoption of appropriate technologies³⁶.

c) Governmental actors should **establish guidance on the use of processing technologies**³⁷ that can improve the nutrient content of food, minimize post-harvest nutrient losses, and promote longer-term storage of food, particularly during periods of drought, flooding, and insufficient production.

d) Governmental actors should **promote regulatory instruments and incentives** to promote reformulation, complemented with appropriate measures such as front-of-pack labels (FOPL) and taxes to minimize the promotion of foods high in energy density with minimal nutritional value, (such as foods high in sodium, sugar, and trans and/or saturated fats), in accordance with World Trade Organization (WTO) rules.

³⁶ Technologies include cold chambers storage units, solar walk-ins, refrigerators, dry storage, storage drums and drying facilities.

³⁷ Technologies include flash and solar drying, converting food to pastes and spreads, appropriate packaging to preserve nutrient content, and post-harvest fortification of food vehicles with micronutrients that are beneficial to health. Food fortification should be guided by national standards, with quality assurance and quality control systems to ensure quality fortification.

e) Private sector actors should strive to **meet public health goals aligned with national food-based dietary guidelines** by further producing and promoting nutritious foods and food products that contribute to [healthy diets](#), such as increasing and preserving nutrient content and making efforts to reformulate foods, when necessary, by reducing the excessive content of sodium, sugar, and saturated fats, and eliminating trans fats in foods.

3.2.5 Improving nutrition and health of farm and food system workers

a) Governmental actors should **ensure that the right to decent work** is respected, protected and fulfilled for farmers and other food producers and workers (including migrants and undocumented workers), that these populations are protected and safe, and that there is no unnecessary burden or undue labour (including child slavery) which could negatively impact their health status.

b) Governmental actors and private sector actors should **provide social protection** when necessary to food producers and workers to ensure they are food secure, have living wages and sufficient livelihoods, and can access healthy diets and adequate health services.

c) Private sector actors should strive to **improve the nutritional status of workers**, increase their access to nutritious foods associated with healthy diets in or through the workplace, and encourage the establishment of facilities for breastfeeding.

3.2.6 Empowering youth across food systems

a) Governmental actors, intergovernmental organizations, and private sector actors should engage and empower youth by **removing obstacles and enhancing their access** to land, natural resources, inputs, tools, information, extension and advisory services, financial services, education, training,

markets, and inclusion in decision-making processes in accordance with national legislation and regulations.

b) Governmental actors, private sector actors, non-governmental organizations, and communities should **invest in appropriate vocational training, education, and mentorship programmes** for youth to increase their capacity and access to decent work and entrepreneurship opportunities to stimulate the transition toward sustainable food systems for the next generation.

c) Governmental actors and private sector actors should **promote development and access to sustainable innovation, resource hubs, and new technologies** for youth along food supply chains that enhance nutrition and support social enterprises (particularly in countries experiencing high rates of youth internal and external migration).

3.3 EQUITABLE ACCESS TO HEALTHY DIETS DELIVERED BY SUSTAINABLE FOOD SYSTEMS

40. Food environments comprise foods available and accessible to people in their surroundings and the nutritional quality, safety, price, convenience, labelling and promotion of these foods. These environments should ensure that people have equitable access to sufficient, safe and nutritious foods that meet dietary needs and food preferences for an active and healthy life³⁸, considering the various physical, social, economic, cultural, and political factors that influence that access. For many people, access to healthy diets can be problematic as they may not be available, accessible, or affordable for a variety of reasons. This section outlines the potential policy entry points to improve physical and economic access, and availability of healthy diets within sustainable food systems in the places where people shop, choose, and eat food.

3.3.1 Improving access to food that contributes to healthy diets

a) Governmental actors should improve the availability and access of nutritious food that contributes to healthy diets through **trade and investment agreements and policies in line with WTO rules**, in accordance with WTO and multilaterally agreed rules, and use such agreements to ensure the progressive realization of the right to adequate food in other countries.

b) Governmental actors should **take into consideration an equity lens** when investing in actions to address food environments and ensure members of historically marginalized and vulnerable communities, residents of low-income communities, Indigenous Peoples, peasants, people facing physical constraints due to age, illness, or disability, and people living in rural areas have sufficient access and ownership to/of diverse food markets in accordance with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

c) Governmental actors should **minimize physical barriers** so that people can grow, purchase, order or eat diverse types of foods that contribute to healthy diets in a given food environment. This can be done by instituting urban planning policies that encourage retail outlets that sell affordable nutritious foods that contribute to healthy diets, and that restrict the growth of retail outlets which sell an overabundance of foods high in energy density with minimal nutritional value, and promote home food production and gardens, where appropriate.

d) Governmental actors should, in accordance with international trade regulations, and in particular WTO rules, encourage zoning laws, certifications and tax incentives for farmers markets, mobile food retailers, street food vendors and other alternative retailers that sell nutritious foods that contribute to healthy diets in low-income areas, and reduce the concentration of vendors that sell foods high in energy density with minimal nutritional value.

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e) Governmental actors, in collaboration with consumer associations, can regulate and **incentivize local food retailers** to increase the number, variety, and sale of nutritious foods that contribute to healthy diets. This can be done by **creating local food policy councils** to give residents a voice in how best to improve availability, access and affordability of healthy diets in their communities.

3.3.2 Improving the availability and affordability of food that contributes to healthy diets

a) Governmental actors should **consider fiscal policies to promote the affordability** of healthy diets. This includes subsidies, granted in accordance to multilaterally agreed rules, to promote nutritious food options to ensure they are affordable and competitive compared with food and beverages high in energy density with minimal nutritional value for which industry tax benefits for their development and marketing should be removed.

COMMENT: Proposed changes aim at ensuring that any financial incentive is granted in accordance to multilaterally trade rules, in particular, Annex 2 of the WTO Agreement on Agriculture.

³⁸ FAO. 2004. Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security. Paragraph 15.

b) Governmental actors should **strengthen public procurement systems** by ensuring healthy diets are available and convenient in public settings and institutions such as kindergartens and other childcare facilities, schools, hospitals, foodbanks, workplaces, government offices and prisons in line with national food-based dietary guidelines.

c) Governmental actors should **link the provision of healthy school meals with clear nutritional objectives**, aligned with national food-based dietary guidelines and adapted to the needs of different age-groups, with special attention to the needs of adolescent girls. Policymakers and UN agencies should consider **promoting home grown school meals**, where food served in schools is procured from local, smallholder and/or family farmers.

d) Governmental actors and intergovernmental organizations should facilitate the affordability of healthy diets for poor households through **social protection programmes** such as vouchers, cash, school feeding, or food supplement programmes.

e) Governmental actors, consumers, and farmer organizations should promote the availability of nutritious food that contributes to healthy diets through **local farmers markets, community cooperatives and other community-building efforts** that engage people around local food cultures.

3.3.3 Monitoring new technologies and promoting trends for healthy diets

a) Governmental actors should understand and acknowledge the influential roles of the **internet, social media, and online marketing of foods**, and should work toward monitoring and encouraging media companies to promote nutritious foods that contribute to healthy diets on social media spheres.

b) Governmental actors should recognize the growing trend of **food purchased online and consumed away from home** (including street food) and should incentivize restaurants/online outlets to offer prepared dishes made from nutritious foods that contribute to healthy diets, display information about food on menus (i.e. calories, product composition, and other nutritional content), avoid food waste, and adhere to food safety regulations.

3.4 FOOD SAFETY ACROSS SUSTAINABLE FOOD SYSTEMS

41. Food safety touches upon all parts of the food system and is critical to prevent food-borne pathogens, hazards and illness, as well as transmission or contamination of naturally occurring toxins, pesticides, antibiotics and heavy metals. Food cannot be considered nutritious if it is not safe, and poor food safety hinders the adoption of healthy diets. There is an increased urgency to improve the ability to track food safety to help monitor the food supply flow, better connect producers to consumers, and facilitate food recalling and withdrawal across coordinated networks. This section highlights the need for global and national cooperation on food safety and for every stakeholder to be responsible and accountable for the sourcing, handling, and quality control of food because of the potential spread of food-related illness.

3.4.1 Adopting national and international cooperation on food safety

a) Governmental actors should **promote food safety within their food systems policies or develop food safety scientifically-based policies** that consider actions across the entire food systems - concerning production, processing, handling, preparation, storage, and distribution of food.

b) Governmental actors should **develop, establish, strengthen and enforce, as appropriate, food control systems**, including reviewing, adopting, modernizing and enforcing national food safety **scientifically-based** legislation and regulations to ensure that food producers and suppliers throughout the food supply chain operate safely. Considering the centrality of the Codex Alimentarius Commission on nutrition and food safety and quality, Governmental actors should implement, as appropriate, internationally adopted Codex standards at the national and sub-national levels.

COMMENT: Introduced changes aim at recalling that any measure adopted to protect human lives or health must be based on a scientifically sound assessment of the risks, as recognized in the WTO SPS Agreement.

c) Governmental actors and the FAO/WHO International Food Safety Authorities Network (INFOSAN) should participate in, share and contribute data and evidence to **international networks that exchange food safety information**, including the surveillance of foodborne hazards and disease outbreaks and management of emergencies to improve food safety across a range of issues such as pesticide residues, antimicrobial residues, endocrine disrupters, chemical and

unsafe food additives, pathogenic bacteria, viruses, parasites, and fraud/adulteration of food products.

3.4.2 Ensuring food safety across food production systems

a) Governmental actors and private sector actors should **consider a One Health Approach**³⁹ to food safety along the entire food and feed chain, recognizing the interconnection between food safety and human, plant, animal and environmental health.

b) Governmental actors, in collaboration with intergovernmental organizations, should **develop and implement national guidelines on the prudent use of antimicrobials in food producing animals** according to [internationally-multilaterally](#) adopted standards, relevant to World Trade Organization/Sanitary and Phytosanitary (WTO/SPS) agreements and Codex ad hoc Intergovernmental Task Force on Antimicrobial Resistance, to reduce the non-therapeutic use of antimicrobials and to phase out the use of antimicrobials as growth promoters.

3.4.3 Protecting consumers from food safety risks in food supplies

a) Governmental actors, private sector actors, and development partners should **promote and enhance traceability in food supply chains**, early contamination detection, and leverage the opportunities that new technologies offer for traceability solutions.

b) Investment by private sector actors and donors should be made to **train food producers, handlers and preparers** and [adapt to comply with national](#) scientifically, risk-based [practices measures](#) that can provide safe food while retaining their nutrient content.

COMMENT: We reiterate previous comments on the importance of the private sector behaving in accordance with multilaterally agreed rules, and on the primary responsibility of the public sector in safeguarding human, animal and plant life and health under the WTO SPS Agreement.

c) Governmental actors should understand and [scientifically](#) evaluate risks and unintended consequences and **manage new food products** created by emerging technologies (e.g. lab grown meats, and gene edited products, etc.) as appropriate depending on scientific risk assessments and Codex

³⁹ One Health is an approach to designing and implementing programmes, policies, legislation and research in which multiple sectors (such as public health, animal health, plant health and the environment) communicate and work together to achieve better public health outcomes. Reference: <https://www.who.int/features/qa/one-health/en/>

standards, where available, as with any new food product in international regulatory frameworks.

3.5 SOCIAL RELATIONS, KNOWLEDGE AND CULTURE OF DIETS

42. It is important to consider and protect the range and diversity of food cultures, social norms, relations, and traditions that contribute to healthy diets without undermining progress in gender equality. This section outlines the policy entry points to improve access to knowledge, awareness, education, and the quality of information available to people on nutritious food, healthy diets and

nutrition as a way to empower people and key actors across food systems, and improve places in which people access food in their daily lives. Context-specific interventions and promotion of traditional diets and knowledge originating from diverse food systems are vital to ensuring equitable, positive and sustainable impacts on nutrition and the environment.

3.5.1 Utilizing policies and tools to provide education and information on healthy diets

a) Governmental actors should **develop national food-based dietary guidelines** for different age groups that define context-specific, diverse, healthy diets by taking into account social, cultural, scientific, economic, ecological and environmental drivers.

b) Governmental actors should **develop nutrition standards and restrict marketing** (including digital marketing), promotion and sponsorships exposure, especially of children aged 18 or younger, to foods high in energy density with minimal nutrition value and sugar-sweetened beverages, in accordance with multilaterally agreed rules and national legislation, where applicable.

c) Governmental actors should **regulate the marketing of commercial infant formula** and other breast-milk substitutes and implement the International Code of Marketing of Breast-Milk Substitutes⁴⁰ and subsequent WHA resolutions.

d) Governmental actors should **regulate nutritional labelling and consider front-of-pack labelling (FOPL)** to promote healthy diets. The FOPL system should be aligned with national public health and nutrition policies and food regulations, as well as relevant WHO guidance and Codex guidelines, [and other relevant multilaterally agreed rules](#). The FOPL system should comprise an underpinning nutrient profile model that considers the overall nutrition quality of the product or the nutrients of concern for NCDs (or both). Complementary policies could be considered for foods of high energy density with minimal nutritional value to not be sold or marketed in public places or near schools, including kindergartens and child care facilities

COMMENT: Introduced changes aim at recognizing the relevance of other multilateral rules, for instance the WTO/TBT Agreement, in the development and application of labelling systems.

e) Governmental actors should provide incentives to private sector actors to **design food markets, restaurants, and other places** where food is sold or served by encouraging the placement and promotion of foods that contribute to healthy diets in retail spaces.

f) Governmental actors, UN agencies, NGOs, and medical and health practitioners should consider **coupling nutrition education and counselling** to populations participating in maternal and child nutrition programmes.

⁴⁰ [International Code of Marketing of Breast-Milk Substitutes](#). WHO, 1981. Geneva.

g) Governmental actors, UN agencies, NGOs, and medical and health practitioners should **promote social and behavior change communication (SBCC)** and social support interventions as a way to positively influence knowledge, attitudes and social norms, and coordinate messaging on nutrition

across a variety of communication channels to reach multiple levels of society (e.g. mass media campaigns).

h) Governmental actors, intergovernmental organizations including UN agencies, preparers of food, and private sector actors should educate all food system actors to **prioritize the reduction of food waste**. Actions could include awareness campaigns at national, regional and global levels, labelling schemes, and updating Food-Based Dietary Guidelines to align recommendations with policies and programmes to tackle food waste.

3.5.2 Encouraging local food knowledge and culture

a) Governmental actors, civil society organizations, and UN agencies should use evidence-based as well as cognitive, cultural, and plural knowledge resources to **promote education and knowledge** of healthy diets, physical activity, food waste prevention, intrahousehold food distribution, food safety, optimal breastfeeding and complementary feeding, taking into consideration cultural and social norms and adapting to different audiences and contexts.

b) Governmental actors, civil society organizations, community leaders, social workers, and health professionals should **encourage food culture** and the importance of food in cultural heritage, culinary skills and nutrition literacy among communities. This can be done through community and consumer associations and educational institutions, targeting men and women.

c) Governmental actors should **protect and promote the knowledge that Indigenous Peoples** have with regard to local traditions and methods of producing, preparing, and preserving food that imparts nutritional and environmental benefits.

3.5.3 Promoting “hubs” for nutrition knowledge, education and information

a) Universities and schools should **institute a nutrition curriculum** for all medical, nursing, and agriculture and food technology students during training.

b) Governmental actors, civil society organizations and UN agencies should **promote culinary skills** among school-age children, adolescents and adults (including promoting communal mealtimes, socializing around food, consuming healthy diets, and reducing food waste) in schools, workplaces and community centres.

c) Governmental actors should **adopt and implement comprehensive school food and nutrition policies**, review education curricula to incorporate nutrition principles, involve communities in promoting and creating healthy food environments and healthy diets in schools, and support school health and nutrition services.

d) Governmental actors, intergovernmental organizations, NGOs, and civil society organizations should **engage in nutrition dialogues with communities** by drawing on the knowledge, experience and insights of individuals who are not usually regarded as members of the nutrition community (e.g. community and religious leaders, chefs, supermarket buyers, influencers on social media, youth leaders, farmers and food producers, young entrepreneurs, mayors and local communities).

3.6 GENDER EQUALITY AND WOMEN'S EMPOWERMENT ACROSS

FOOD SYSTEMS

43. Gender relations and cultural norms are among the most significant drivers of healthy diets and nutrition outcomes. In many countries, women produce food, make decisions about the household's diet and, as primary caregivers, and influence the family's nutritional status. Women are important agents of change for sustainable development, not only as food system actors, but also as actors in their households, communities and overall society. At the same time, women have an unequal household labour burden that should be addressed. Therefore, women's and girl's empowerment through education, information and access to resources and services is key to improving nutrition. This section highlights the importance of improving women's wellbeing, ensuring access to financial, technical and biophysical resources, improving agency, voice and status, and challenging the power relationships and legal impediments that limit equality and choices.

3.6.1 Empowering women

a) Governmental actors should **pass laws that promote equal participation** between women and men in political decision-making, supporting women with specific attention to rural women, holding leadership roles in decision making bodies – parliaments, ministries and local authorities at district and community levels – so that they can be part of the process of devising solutions to the malnutrition challenges they face.

b) Governmental actors should **promote an enabling environment to generate cultural changes towards gender equality** with specific policies, programmes, institutions and advocacy campaigns to deal with the various forms of discrimination and violence women face.

c) Governmental actors and intergovernmental organizations should **increase adolescent girls' and women's human capital** by ensuring they have access to education, literacy programmes, health care, and other social services as a way to increase household nutritional status.

3.6.2 Promoting and acknowledging women as food system entrepreneurs

a) Governmental actors should **ensure women's equal tenure rights** and promote their equal access to and control over productive land, natural resources, inputs, productive tools, and access to education, training, markets, and information in line with the CFS VGGT.

b) Governmental actors, private sector actors, and intergovernmental organizations should **enhance women's roles in agriculture** by giving women decision-making power over what they choose to produce, and how they choose to produce those crops/food. Women should be offered equal levels of access to extension and advisory services for crops and animal products that they produce or process, capacity-building to engage with traders, financial services (credit and savings mechanisms), and entrepreneurial opportunities across food systems.

c) Governmental actors, NGOs and private sector actors should **promote and increase access to labour and time saving technologies**⁴¹ that could help improve the livelihoods of women.

d) Governmental actors and private sector actors should **facilitate women's equal access to entrepreneurship and employment opportunities** across food systems and related activities to

generate income and increase their participation in decisions on the use of household income and build and manage savings without reinforcing unequal gender roles. This would include household and business budget training, decision-making skill development, scaling of financial services and products both accessible and relevant to women's needs, and tools to help men and women strengthen their intra-household communication.

3.6.3 Recognizing women's nutritional status and deprivation

a) Governmental actors, intergovernmental organizations, NGOs, and development partners should **pay specific attention to the nutritional well-being of adolescent girls and women** and provide health and nutritional care and services through various sectors. This can be done by ensuring that national development strategies are driven by gender analyses, and that those women and adolescent girls with compromised nutritional status and higher levels of deprivation, are the recipients of social protection policies and benefits.

b) Acknowledging the significant time and work burden of women in the preparation of nutritious meals, and their roles in agriculture and food production, governmental actors should **recognize and value the importance of unpaid care work** at the household level through the effective implementation of protective laws, social protection programmes, and other benefits, and should enable gender-equitable distribution of care work. The equal participation of men in unpaid work should be promoted, especially where women are also active in productive labour.

c) Governmental actors should create an enabling legal framework and supportive practices to **protect and support breastfeeding**, ensuring that decisions to breastfeed do not result in women losing their economic security or any of their rights. This should include implementing maternity protection legislation, including entitlement to publicly-funded paid maternity leave (or paternity leave), and removing workplace-related barriers to breastfeeding (lack of breaks facilities, and services).

3.7 RESILIENT FOOD SYSTEMS IN HUMANITARIAN CONTEXTS

44. Linking food security and nutrition interventions during humanitarian crises (man-made and climate-related disasters) with longer-term strategies to strengthen the resilience of food systems is key.

Short or protracted crises are often brought on by conflict and climate change, displacing millions which increases their risk of food insecurity and malnutrition. Considering the importance of resilient food systems, this section highlights the importance of strengthening the nexus between humanitarian and development programming and builds upon the 11 principles in the CFS Framework for Action for Food Security and Nutrition in Protracted Crises (FFA)

⁴².

⁴¹⁴¹ These include food preservation and processing equipment, cold storage, heat and thermal processing, grinding/blending devices, energy saving stoves, and modern farm equipment for ploughing, cultivating and harvesting nutritious crops/food and raising small ruminants and poultry.

⁴² CFS Framework for Action for Food Security and Nutrition in Protracted Crises

3.7.1 Protecting the most vulnerable to malnutrition in humanitarian contexts

a) Governmental actors and humanitarian organizations should pay particular attention, protection, and **facilitate access to nutritious food and nutritional support to most vulnerable and marginalized groups.**

b) Governmental actors and parties involved in conflicts should **respect and protect the equal and unhindered access** of all members of affected and at-risk populations to food security and nutrition assistance, in both acute and protracted crises, in accordance with internationally recognized humanitarian principles, as anchored in Geneva Convention of 1949 and other UNGA Resolutions after 1949.

c) Governmental actors, with the support of the UN system and international assistance and cooperation where appropriate, should ensure **access to nutritious food and nutritional support for refugees and asylum seekers** in their territory, in accordance with their obligations under relevant international legal instruments.

3.7.2 Improving the quality of food and nutrition assistance

a) Governmental actors, all parties involved in conflicts, climate-related disasters and food assistance, including humanitarian organizations, should **ensure that food security and nutrition assessments and analyses** (such as the Integrated Phase Classification System) are undertaken throughout a crisis to inform the food and nutrition response as well as any components of the local food system requiring rehabilitation.

b) Governmental actors should recognize nutrition as an essential need and humanitarian assistance should **aim to meet nutritional requirements of the affected population**, particularly the most vulnerable to malnutrition. Any food items provided should be of appropriate nutritional quality and quantity, be safe and acceptable, and not harm local markets. Food must conform to the food standards of the host country's government [adopted in line with WTO rules and, in particular,](#) in line with the Codex Alimentarius standards about food safety, quality, and labelling.

c) Governmental actors and humanitarian assistance organizations should be encouraged to **purchase locally produced, fortified food** (including Ready to Use Supplementary and Therapeutic foods in some contexts) and ensure they are available through social protection mechanisms and acute malnutrition management programmes, with improved coverage during times of crisis. Fortification should be used only in limited times and places and should not disrupt local market and accessibility of nutritious food in the longer term.

d) Governmental actors should **have an explicit policy on infant and young child feeding (IYCF) in emergencies**, and governmental actors, UN agencies and NGOs should ensure that such policies on IYCF practices are implemented, coordinated, promoted, and improved upon during humanitarian crises.

e) UN agencies and humanitarian assistance organizations should ensure that when implementing cash and voucher assistance, **the minimum expenditure basket and transfer value is promoting nutritious food** that is locally available and sufficient to provide a healthy diet for all stages of the lifecycle.

3.7.3 Ensuring food systems are resilient in humanitarian contexts

a) Governmental actors in partnership with relevant organizations should **develop and use early warning systems, climate information services, and food and agriculture information systems** that detect and monitor threats to food production, availability and access as well as food safety and tampering. These early warning systems should be integrated into broader food analysis systems including the monitoring of the availability and affordability of nutritious foods that contribute to healthy diets at the local level.

b) Governmental actors, development partners and donors should **invest in disaster risk reduction measures** that benefit those most at risk/need. In particular, productive assets should be protected from severe weather and climate impacts in a way that strengthens the resilience of affected populations and their ability to cope with shocks due to conflicts and climate –related disasters. Governmental actors should aim to restore local food production and market accessibility as rapidly as possible.

c) Intergovernmental organizations particularly the UN agencies and development partners should **use local organizations in the implementation of humanitarian food assistance** and livelihood programmes to support economic recovery and development, strengthen sustainable local food systems and foster the ability of smallholders and/or family farmers to access resources to bolster production and markets.

PART 4 - IMPLEMENTATION AND MONITORING OF THE USE AND APPLICATION OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION

4.1 POLICY FORMULATION AND IMPLEMENTATION OF THE VGFSyN

49. All CFS stakeholders are encouraged to **promote at all levels** within their constituencies, and in collaboration with other relevant initiatives and platforms, the **dissemination, use and application of the VGFSyN** to support the development and implementation of coordinated and multisectoral national policies, laws, programmes and investment plans.

50. The VGFSyN are intended to **support the implementation of the UN Decade of Action on Nutrition 2016-2025** with the objective of increasing the visibility, coordination and effectiveness of nutrition actions at all levels, as key aspects toward the realization of the 2030 Agenda for Sustainable Development.

51. Governmental actors are invited to use the VGFSyN as a tool to undertake new initiatives toward ~~the transformation of ensuring sustainable~~ food systems ~~to make them more sustainable~~ and capable of delivering healthy diets. These include **identifying policy opportunities, fostering a transparent and open dialogue, promoting coordination mechanisms, and establishing or**

strengthening existing, multistakeholder platforms, partnerships, processes and frameworks, such as the Scaling Up Nutrition (SUN) Movement.

52. Parliamentarians and their regional and sub-regional alliances have a key role in **promoting the adoption of policies, establishing appropriate legislative and regulatory frameworks**, raising awareness and promoting dialogue among relevant stakeholders, and allocating resources for the implementation of laws and programmes dealing with food systems and nutrition.

4.2 BUILDING AND STRENGTHENING CAPACITY FOR IMPLEMENTATION

53. Governmental actors, supported by donors and financing institutions, need to **mobilize adequate financial, technical and human resources** to increase the human and institutional capacity of countries to implement the VGFSyN and to identify priorities toward their operationalization and monitoring at the national and local levels. Technical agencies of the UN, bilateral cooperation and other financing mechanisms can assist in this regard. The organization of multistakeholder workshops and training, as well as the development of user-friendly and technical guides, deployed via extension services and digital means, are important to contextualize and adapt to local contexts.

54. Donors, financing institutions and other funding entities are encouraged to **apply the VGFSyN when formulating their policies for loans, grants and programmes** to support both rights holders' and duty bearers' endeavours. The VGFSyN should contribute to the design of investments that aim to increase the production, affordability, and access to diverse and nutritious food, as well as to promote the integration of nutrition and health dimensions into agriculture and food sector investment plans, as well as to promote the integration of sustainable agriculture and food system dimensions into nutrition and health investment plans.

55. Development partners, technical agencies of the UN, including the Rome-based Agencies, and regional organizations are encouraged to **support efforts by Governmental actors** to implement the VGFSyN. Such support could include research and technical cooperation, financial assistance, the provision of evidence-based policy advice, institutional capacity development, knowledge sharing and exchange of experiences, and assistance in developing national and regional policies. Actions should be taken to improve partners' capacity to design, manage and participate in multistakeholder partnerships, to ensure transparency and accountability and promote good governance for effective results.

Moreover, UN interagency coordination mechanisms for nutrition could be leveraged to support the uptake of the VGFSyN at country level.

56. National and international research organizations, academic institutions, and universities should **provide the knowledge, innovation, science, and evidence on all dimensions of food systems** (including citizen/consumer demand and behaviour change) to enable governmental actors and other food system stakeholders to examine the evidence, prioritize issues to be considered, evaluate impacts, and address potential trade-offs.

57. The dissemination and uptake of the VGFSyN can be facilitated through the **identification of "champions" and "change agents"**, especially among civil society, who could raise awareness

across sectors and different governmental levels, and the organization of advocacy campaigns at different levels.

4.3 MONITORING OF THE USE AND APPLICATION OF THE VGFSyN

58. Governmental actors, in consultation with relevant stakeholders, should **define national policy priorities and related indicators and establish or strengthen existing monitoring and reporting systems** in order to assess the efficiency of laws, policies and regulations, and implement appropriate remedial actions in case of negative impacts or gaps.

59. By implementing the VGFSyN, governmental actors are expected to **contribute to the achievement of the six Global Nutrition Targets (2025)** endorsed by the WHA in 2012⁴³ **and its diet related NCD targets**⁴⁴. The VGFSyN should support countries in defining priority actions and formulating “SMART” commitments⁴⁵ in order to achieve nutrition objectives as well as to promote the creation of informal coalitions of countries to accelerate and align efforts around specific topics linked to one or more action areas of the Nutrition Decade and the 2030 Agenda. This can be done through advocating for policies and legislation, allowing the exchange of practices and experiences, highlighting successes and lessons learned, and providing mutual support to accelerate implementation.

60. CFS should include the VGFSyN in its ongoing work on monitoring, relying as much as possible on existing mechanisms. **CFS should organize a Global Thematic Event** where all relevant stakeholders can learn from the experiences of others in applying them and assess their continued relevance, effectiveness and impact on food security and nutrition.

⁴³ <https://www.who.int/nutrition/global-target-2025/en/>

⁴⁴ <https://www.who.int/beat-ncds/take-action/targets/en/>

⁴⁵ In the context of the UN Decade of Action on Nutrition and ICN2 follow-up process, country commitments for action should be specific, measurable, achievable, relevant and time-bound. https://www.who.int/nutrition/decade-ofaction/smart_commitments/en/