

Contents

PART 1 - INTRODUCTION..... 2

1.1 BACKGROUND AND RATIONALE 2

1.2 KEY CONCEPTS..... 76

PART 2 – OBJECTIVES AND GUIDING PRINCIPLES 87

2.1 OBJECTIVES AND PURPOSE..... 87

2.2 NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS..... 98

2.3 GUIDING PRINCIPLES FOR TRANSFORMING FOOD SYSTEMS OR PROMOTING SUSTAINABLE FOOD SYSTEMS..... 109

PART 3 - THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION..... 1140

3.1 TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS..... 1342

 3.1.1 Promoting policy coherence by integrating nutrition into national development..... 1342

 3.1.2 Strengthening multisectoral coordination and actions 1342

 3.1.3 Creating accountability mechanisms, monitoring and evaluation 1443

3.2 SUSTAINABLE FOOD SUPPLIES FOR IMPROVED DIETS AND NUTRITION IN THE CONTEXT OF CLIMATE CHANGE..... 1544

 3.2.1 Prioritizing climate adaptation and mitigation across food supplies..... 1544

 3.2.2 Ensuring sustainable use and management of natural resources in food production..... 1645

 3.2.3 Promoting nutrition within agriculture and food production 1745

 3.2.4 Improving food storage, processing, transformation and reformulation 1846

 3.2.5 Improving nutrition and health of farm and food system workers 1947

 3.2.6 Empowering youth across food systems 2047

3.3 EQUITABLE ACCESS TO HEALTHY DIETS DELIVERED BY SUSTAINABLE FOOD SYSTEMS 2047

 3.3.1 Improving access to food that contributes to healthy diets..... 2148

 3.3.2 Improving the availability and affordability of food that contributes to healthy diets..... 2148

 3.3.3 Monitoring new technologies and promoting trends for healthy diets 2249

3.4 FOOD SAFETY ACROSS SUSTAINABLE FOOD SYSTEMS 2249

 3.4.1 Adopting national and international cooperation on food safety 2220

 3.4.2 Ensuring food safety across food production systems 2320

 3.4.3 Protecting consumers from food safety risks in food supplies..... 2320

3.5 SOCIAL RELATIONS, KNOWLEDGE AND CULTURE OF DIETS 2424

 3.5.1 Utilizing policies and tools to provide education and information on healthy diets..... 2424

 3.5.2 Encouraging local food knowledge and culture..... 2622

Commented [A1]: The guidelines are primarily addressed to governmental actors as mentioned in the text (even though 9 actors are listed in para 30). I wonder why is this the case. What is the role of other stakeholders? I wonder why the role of all stakeholders in promoting nutrition is underplayed. Is this a CFS decision? Do we foresee to develop recommendations that will be more explicit for the private sector, the civil society and the others in the future? The impression that someone gets is that other stakeholders need only to monitor if governments are implementing the recommendations without themselves being accountable for much. The paradox is that many recommendations influence other stakeholders to change their practices etc. which is a clear disincentive to monitor (a classic moral hazard). Just some numbers: 91 recommendations are counted. Most of them start by "Governments should do...". Actually 3 start with private sector, 2 with research institutions, 2 with UN and 2 are undefined (i.e. recognize the role of women by everyone for example). The numbers are not very accurate since in some cases but very few, after government some other actors follow.

The 2020 edition of *The State of Food Security and Nutrition in the World (SOFI)* may add value in view of this year's theme given the analysis taking place. SOFI 2020 will focus on the affordability of healthy diets, as this issue is of paramount importance in our efforts towards meeting the SDG 2 targets to end hunger and food insecurity (SDG Target 2.1) and all forms of malnutrition (SDG Target 2.2) by 2030. This theme is even more relevant today, given the necessity to ensure access to health food to all during the COVID-19 pandemic.

Meeting these targets will only be possible if we not only ensure that people have enough food to eat, but also that *what* they are eating is nutritious. What people eat must comprise not only sufficient calories, but also adequate levels of nutrients to meet dietary recommendations, with a diverse mix of foods from all food groups. The food system needs important transformations to ensure that healthy diets are affordable to a growing world population.

SOFI 2020 will present new evidence showing that healthy diets are unaffordable to many people in every region of the world, especially the poor and those who face challenging economic conditions. It will further show that the higher cost and unaffordability of healthy diets is strongly associated with increased food insecurity and different forms of malnutrition, including stunting and obesity. Furthermore, it unveils that, beyond cost and affordability of healthy diets, there are hidden costs and externalities associated with current food consumption patterns, most notably those related to the health and environmental consequences of our dietary choices. These impose costs on society – increased health costs and the costs of dealing with adverse effects of climate damages and variability – that are currently not reflected in the costs of current

3.5.3 Promoting “hubs” for nutrition knowledge, education and information..... 2622

3.6 GENDER EQUALITY AND WOMEN’S EMPOWERMENT ACROSS FOOD SYSTEMS 2723

3.6.1 Empowering women 2723

3.6.2 Promoting and acknowledging women as food system entrepreneurs..... 2723

3.6.3 Recognizing women’s nutritional status and deprivation 2824

3.7 RESILIENT FOOD SYSTEMS IN HUMANITARIAN CONTEXTS 2824

3.7.1 Protecting the most vulnerable to malnutrition in humanitarian contexts 2925

3.7.2 Improving the quality of food and nutrition assistance..... 2925

3.7.3 Ensuring food systems are resilient in humanitarian contexts..... 3026

PART 4 - IMPLEMENTATION AND MONITORING OF THE USE AND APPLICATION OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION 3026

4.1 POLICY FORMULATION AND IMPLEMENTATION OF THE VGFSyN 3026

4.2 BUILDING AND STRENGTHENING CAPACITY FOR IMPLEMENTATION 3127

4.3 MONITORING OF THE USE AND APPLICATION OF THE VGFSyN 3228

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 potential 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, often characterized by the coexistence of undernutrition along with overweight and obesity. 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 is a cornerstone in the combat against malnutrition in all its forms. and in the implementation context of the national food security. Food security and nutrition are closely linked under Goal 2 of the 2030 Agenda for Sustainable Development “End hunger, achieve food security and improved nutrition and promote sustainable agriculture”.

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 (moderate or severe), poses a significant risk of increased

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.

Commented [A2]: Malnutrition is not always the result of food insecurity (lack of access to food).

Commented [A3]: It is important to show that both forms of malnutrition (undernutrition, as well as overweight and obesity) exist at the same time

Commented [A4]: I suggest rephrasing this sentence, because the way it is written it seems like if the direction of the association is from malnutrition to the nonfulfillment to right to food, whereas it’s the other way around.

Commented [A5R4]: I furthermore edited the text to reflect this comment. I also excluded “in the context of national food security” because the link between the Right to Food and national food security did not make sense to me. The Right to Food refers to people’s food security, not the country’s food security. The USA, for example, is a food security country where many people’s right to food is violated.

morbidity and mortality in children. Stunting, also known as chronic malnutrition, is associated with delays in both physical growth, [devastating health outcomes](#), and cognitive development.

3. **Micronutrient deficiencies** related to the inadequate intake of foods 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, [which is one of the most prevalent micronutrient deficiencies in the world](#). 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 [health, 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~~ [which in turn puts them at higher risk of being](#)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 [overweight in school-age children and](#) 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, sufficient and nutritious foods](#) 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 economic and societal structures and processes that slow down the realization of human rights, and perpetuate poverty, inequalities, and fail to make healthy diets readily accessible,](#) limiting or denying the access of [vulnerable populations](#)all 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

Commented [A6]: This paragraph also describes health impacts.

Commented [A7]: Edited because “becoming undernourished children into adulthood” does not make sense.

Commented [A8]: These are child health risks only. Maternal risks to be added to correspond to the statement.

Commented [A9]: Rome Declaration on Nutrition, para 3.

Commented [A10]: I edited this because it is too focused on poverty as a cause of poor nutrition. Poverty is an important contributing factor, but especially in a document about food systems, in a paragraph about interrelated and underlying causes, it is essential to acknowledge factors that contribute to poor nutrition in all income groups. I added “economic” to highlight problems with the economic model (e.g. that have led to the concentration of the agrofood industry). But if that is included in “societal structures” it can be deleted. I see this has significant overlap with paragraph 7, so I am not sure why they are two separate paragraphs.

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. This, including, 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 crises² 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.

9-10. No healthy balanced and sustainable diets because of dependence on few crops³ as of 2014, fewer than 200 species had significant production levels globally,³ with only 8 crop species (barley, beans, groundnut, maize, potatoes, rice, sorghum and wheat) providing 53 percent of average daily calories consumed, and 5 animal species (cattle, sheep, goats, pigs and chickens) providing 31 percent of average daily protein consumed, and 3 crop species (wheat, rice and maize) representing 48 percent of average daily calories consumed.⁴

10-11. Climate change, agriculture⁵, 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 aquaculture, fisheries and agroforestry in areas already vulnerable to food insecurity. Climate change also thus impacts all the dimensions of food security, as well as 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 for a growing global population are major contributors to greenhouse gas emissions and account for large portions of the planet's soil, land and fresh-water use, and environmental degradation.

11-12. 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

² Protracted crisis situations are "characterized by recurrent natural disasters and/or conflict, longevity of food crises, breakdown of livelihoods and insufficient institutional capacity to react to crises". [2010 State of Food Insecurity in the World Report](#). FAO. 2010

³ FAO. 2019. [The State of the World's Biodiversity for Food and Agriculture](#). J. Bélanger & D. Pilling (eds.). FAO Commission on Genetic Resources for Food and Agriculture Assessments. Rome. 572 pp. (<http://www.fao.org/3/CA3129EN/CA3129EN.pdf>)

⁴ FAO 2018. [Sustainable agriculture for biodiversity - Biodiversity for sustainable agriculture](#). Rome (<http://www.fao.org/3/a-i6602e.pdf>)

⁵ Agriculture includes crops, forestry, fisheries, livestock and aquaculture. [UNGA Resolution A/RES/74/242](#). Paragraph 20

Commented [A11]: It's not very clear what services are meant here – perhaps it should be spelled out or put in a footnote.

Commented [A12]: Is there evidence documenting that these are the populations most affected?

Commented [A13]: I edited this to clarify that the list of people does not refer only to people have less control over their dietary choices.

Commented [A14]: ¿Syndemic crises?
Lancet commission:
Mendenhall, Emily & Singer, Merrill (2019). The global syndemic of obesity, undernutrition, and climate change. *Lancet*. 393 (10173), 741.
DOI:[https://doi.org/10.1016/S0140-6736\(19\)30310-1](https://doi.org/10.1016/S0140-6736(19)30310-1)

Commented [A15]: There is a need to diversify production for better nutrition.

Commented [A16]: Comment on definition in footnote
Agriculture includes crops, forestry, fisheries, livestock and aquaculture

Usually we list the sectors as follows which is more logical and clearer, just listing the biological groups does not refer to the concept of 'culture' in agriculture:
Agriculture includes crop and livestock production, aquaculture, fisheries and forestry.

Commented [A17]: This makes it seem that the relationship is one-sided (increase in temperature, heat waves etc. affect crop yield and livestock productivity... but how do our agricultural systems and livestock production affect the climate? Agriculture is part of the solution but also part of a problem that must be acknowledged.

Commented [A18]: Either say "Potentially impacting fisheries" or "Expected to impact the productivity and distribution of many fisheries resources", which is more complete. FAO Fisheries statistics show that capture fisheries are not declining.

Commented [A19]: Why is there suddenly reference to a specific integrated system and not the sector as such as the list includes logically forestry.

Why does it mention only "agroforestry"? We think that should be changed to "forestry" (or "forestry and agroforestry") to refer to a broader context.

Commented [A20]: Not also nutrition logical consequence

Commented [A21]: The list is not complete without reference to land degradation and erosion of biodiversity.

Commented [A22]: Why is this only focused on climate change, while biodiversity is equally important for healthy diets? In para 32 d, climate and biodiversity are both referred to.

world. In many regions of the world, dietary changes are shifting towards the consumption of convenient [processed or highly processed](#) foods 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.

12-13. Food systems⁶ are complex webs of activities and actors involving the production, processing, handling, preparation, storage, distribution, [access, purchase, consumption](#) and [ultimately even](#) waste of food. They are constantly being shaped by different forces, drivers and decisions by many different [individuals, stakeholders and actors](#). Every food system has the capacity to be equitable and to produce healthy diets needed for [food security and](#) 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 show their limits in terms of sustainability and inefficiency in natural resource utilization, and in the use of labour and energy, leading to environmental [and natural resources degradation, soil degradation, water scarcity, water and soil](#) pollution, and loss of biodiversity as well as to excessive food consumption and food waste patterns.

13-14. 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, [natural resource management](#), and social norms⁷.

14-15. Transforming food systems and promoting sustainable food systems⁸ 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 [producing and](#) accessing [safe, diverse and nutritious](#) -foods that [contribute to](#) healthy diets.

15-16. **Changes in governance** are needed within and across food systems, and its constituent elements, namely [food supply chains](#)⁹, food environments¹⁰, [and](#) consumer behaviour¹¹ [and governance](#)

⁶ "Food systems gather all the elements (environment, people, inputs, processes, infrastructures, institutions, etc.) and activities that relate to the production, processing, distribution, preparation and consumption of food, and the output of these activities, including socio-economic and environmental outcomes". HLPE. 2014. [Food Losses and Waste in the context of Sustainable Food Systems](#). A report by the High-Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.

⁷ HLPE. 2017. [Nutrition and food systems](#). A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security.

⁸ "Sustainable food systems are food systems that ensure food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition of future generations are not compromised". HLPE 2014a

⁹ Food supply chains "consist of the activities and actors that take food from production to consumption and to the disposal of its waste, including production, storage, distribution, processing, packaging, retailing and marketing." HLPE 2017b

Commented [A23]: Along with all food system elements, aggressive promotion and advertising of unhealthy diets are modelling current food pattern. As well as the lack of information on highly processed products and sugar drinks to be used by consumers to make informed purchases.

Commented [A24]: Another reference suggested to be included <http://www.fao.org/3/ca2079en/CA2079EN.pdf>

Commented [A25]: According to FAO, the four pillars of food security are availability, access, utilization, and stability – there should be a link between the food systems and FSN (food security and Nutrition)

Commented [A26]: "Ultimately waste" sounds like it is the inevitable final step.

Commented [A27]: I edited to lessen the emphasis on decisions by individuals, as decision-making is more diffuse, often somehow collective or serving the collective or corporate interests.

Commented [A28]: And while preserving natural resources, to cover the three dimensions of sustainability

Commented [A29]: But also, importantly, based on its internal structure (elements and linkages).

Commented [A30]: This should also include the sustainable governance of the natural resources, including land and water and land tenure (VGGT)

Commented [A31]: This is a logistics term. Food value chains incorporate the notions of governance, value added, behavioral change by all actors (not just consumers), the enabling environment, etc. for a definition see <http://www.fao.org/3/a-i3953e.pdf>

of land and natural resources¹² to generate positive outcomes along the three dimensions of sustainability – social, economic, and environmental.

16-17. 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.

17-18. 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 \(HLPE\)¹³ 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.

18-19. 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 forms¹⁴. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025)¹⁵ 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)¹⁶. Specific attention to nutrition has been given by a number of UNGA

Commented [A32]: The Responsible Governance of Tenure of Land, Fisheries and Forests is essential for sustainable Food Security

Commented [A33]: Does agriculture here include fisheries, forestry etc.? "Food production"? If so, please include a footnote when first mentioned to explain that in FAO language Agriculture includes...

¹⁰ Food environments "refer to the physical, economic, political and socio-cultural context in which consumers engage with the food systems to make their decisions about acquiring, preparing and consuming food." HLPE 2017b

¹¹ Consumer behaviour "reflects all the choices and decisions made by consumers on what food to acquire, store, prepare, cook and eat, and on the allocation of food within the household." HLPE 2017b

¹² [The Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security promote secure tenure rights and equitable access to land, fisheries and forests with respect to all forms of tenure: public, private, communal, indigenous, customary and informal.](#)

¹³ The HLPE is the science-policy interface of CFS and provides a structured evidence base to inform CFS policy discussions drawing on existing research and knowledge, experiences, and policies at different scales and in different contexts.

¹⁴ FAO/WHO. 2014. ICN2, [Rome Declaration on Nutrition](#).

¹⁵ UNGA Resolution [A/RES/70/259](#) - The [Work Programme of the UN Decade of Action on Nutrition](#)

¹⁶ [UNGA Resolution A/RES/72/239](#).

Resolutions¹⁷, the UN Economic and Social Council (ECOSOC)¹⁸, the UN Environment Assembly¹⁹, the World Health Assembly (WHA)²⁰ and the UN Special Rapporteur on the Right to Food²¹.

~~19-20.~~ 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 Action²² 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) 2²³, with particular attention to targets 2.1²⁴, 2.2²⁵ and 2.4²⁶. 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

~~20-21.~~ **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,²⁷ as well as **against** 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 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 benefits²⁷. **Safe and clean drinking water is an important component of a healthy diet.**

~~21-22.~~ **Sustainable healthy balanced and sustainable healthy diets** are healthy diets that combine all the dimensions of sustainability (i.e. economic, social, and environmental) to avoid unintended consequences and undermine healthy diets of future generations. **They hinge on biodiversity for food and agriculture, contribute to its conservation and sustainable use, and have a low environmental**

¹⁷ UNGA Resolutions [A/RES/73/2](#), [A/RES/73/132](#), and [A/RES/73/253](#).

¹⁸ [Ministerial Declaration of the 2018 High-Level Political Forum on Sustainable Development](#)

¹⁹ [Ministerial Declaration of the 2019 United Nations Environment Assembly](#)

²⁰ 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.

²¹ [A/71/282 "Interim report of the Special Rapporteur on the right to food"](#)

²² FAO/WHO. 2014. ICN2, [Framework for Action](#).

²³ SDG 2, "End hunger, achieve food security and improved nutrition and promote sustainable agriculture".

²⁴ 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".

²⁵ 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".

²⁶ 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".

²⁷ Adapted from WHO healthy diet: [www.who.int/news-room/fact-sheets/detail/healthy-diet](#)

Commented [A34]: Safe drinking water should be part of a healthy diet – pillar 3 of food security (utilization) is only possible if people have access to safe water. See also para 6 where safe drinking water is referred to. Contaminated water is the reason for intestinal diseases that avoid the best utilization of the foods consumed.

Commented [A35]: Added this to avoid the interpretation that NCDs is a form of malnutrition.

Commented [A36]: See guiding principle 5 of <http://www.fao.org/3/ca6640en/CA6640EN.pdf>.

If people get sick because of contaminated water, the food they consume will not be optimally utilized

Commented [A37]: In line with UN agreed language. Reference to UNGA document <http://www.fao.org/3/ca6640en/ca6640en.pdf>

Commented [A38]: <https://www.un.org/development/desa/dspd/2030agenda-sdgs.html>

Commented [A39]: Would be good to add the definition of this to the key concepts chapter or include the dimensions in the brackets.

impact. They contribute to the preservation conservation of biodiversity and have a low environmental pressure and impact²⁸.

22-23. Nutritious foods are those foods that 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.

23-24. 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 that is sufficient to satisfy the dietary needs of individuals, free from adverse substances and acceptable within a given culture.²⁹

Commented [A40]: As outlined by the referred document in page 10, in line with the recently approved FAO Strategy on Mainstreaming Biodiversity across Agricultural Sectors (please see CL 163/11 Rev.1: <http://www.fao.org/3/ca7175en/ca7175en.pdf>).

Commented [A41]: In relation to biodiversity FAO used the term conservation not preservation to indicate that there might be adaptation happening and not a state of preservation like in a tin is intended. The terms are used differently in the USA and other regions. USA tends to use preservation.

Commented [A42]: What about a social factor in terms of cultural norms and taboos in some societies as well as intrahousehold food distribution?

Commented [A43]: Other terms to include: sustainable food systems, orphan crops, nutrient-dense food with minimal nutritional value

PART 2 – OBJECTIVES AND GUIDING PRINCIPLES

2.1 OBJECTIVES AND PURPOSE

24-25. The **objective of the VGFSyN** is to contribute to transforming food systems³⁰ and promoting sustainable food systems to ensure that the foods and beverages that contributes to healthy balanced and 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”³¹.

Commented [A44]: This conforms to UN agreed language.

25-26. 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.

Commented [A45]: Behavioral change-based? Seems to most important and implies a specific approach linked to incentives and capacities...

26-27. 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.

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²⁸ Adapted from [FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome](#)

²⁹ 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).

³⁰ [UNGA Resolution A/RES/74/242](#), Paragraph 40.

³¹ FAO/WHO. 2014. [JCN2, Rome Declaration on Nutrition](#), Paragraph 5.b.

~~27-28.~~ These VGFSyN take **evidence** from a range of rigorous studies, best practices, and world experience - at municipal, at sub-national, and at national levels - and apply the evidence through a broad lens.³² Much of the evidence in the VGFSyN comes from the HLPE 2017 report, various UN technical documents, and peer-reviewed scientific literature.

Commented [A46]: In this footnote, what does “evidence from different methodologies, some of which is experiential that holds promise for real-world relevance” mean? Does it refer to ad hoc, context-specific, case study experiences that may be relevant in other settings? Successful experiences that may be generalizable or scaled up? Or at least have broader relevance, if not totally generalizable?

2.2 NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS

~~28-29.~~ 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.

~~29-30.~~ 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:

Commented [A47]: Also include: Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication
<http://www.fao.org/3/a-i4356en.pdf>

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

~~30-31.~~ 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:

³² 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.

- 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 ~~peoples~~ and workers;
- ~~e)d) Indigenous peoples representatives and their organizations;~~
- ~~e)e) Farmer organizations and their networks;~~
- ~~e)f) 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 industry³³;~~
- ~~f)g) Research organizations, academic institutions, and universities;~~
- ~~f)h) Development partners, including international financial institutions;~~
- ~~f)i) Private donors, foundations, and funds;~~
- ~~f)j) Consumer associations.~~

Commented [A48]: To separate indigenous peoples from civil society.

Rational:

Indigenous peoples have their own governance systems and their own organizations. It is important to not invisibilize them while mixing them with civil society. Some indigenous societies are called nations; others are kingdoms, bands, pueblos, or tribes. Indigenous peoples have mobilized to represent themselves before the international community to participate in international decision-making processes and raise awareness on their particular issues. The civil society agenda is not related to indigenous peoples challenges and contributions to SDGs.

Commented [A49]: These actors are likely to use it only if the relevant government policies are in place.

2.3 GUIDING PRINCIPLES FOR TRANSFORMING FOOD SYSTEMS OR PROMOTING SUSTAINABLE FOOD SYSTEMS

~~31-32.~~ The VGFSyN include **five guiding principles**³⁴ that emerged from the consultation process as foundational when considering the different actions that should be followed to contribute to transforming food systems and promoting sustainable food systems that enable healthy diets.

~~32-33.~~ 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,³⁵ seeks to simultaneously maximize outcomes across all sustainability dimensions, and looks at the multidimensional causes of malnutrition in all its forms.
- b) **Coherent and context-specific policies.** Contribute to the formulation and implementation of coherent and context-specific policies and related investment through coordinated actions

Commented [A50]: Rationale for inclusion of this footnote:

The Global Hub on Indigenous food systems is the main output of the [High-Level Expert Seminar on Indigenous Food Systems](#) which took place at FAO HQ in November 2018. The Expert Seminar gathered 200 participants, out of which 23 country delegates, 70 speakers, 22 indigenous communities and 20 research centres. The Global Hub will be officially launched at the 27th Session of the Committee on Agriculture, and will aim to provide technical inputs to ongoing policy discussions and processes, such as the VGFSyN, UN Decade of Action on Nutrition, UN Decade on family farming, etc.)

³³ 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.

³⁴ 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.

³⁵ [The Global Hub on Indigenous food systems, which will be officially launched at the 27th Session of the Committee on Agriculture, will be an important contributor to provide scientific and evidence-based inputs to approaches aiming at transforming food systems and promoting sustainable food systems, in particular when targeting the food systems of indigenous peoples and pastoralists.](#)

among different actors and across all relevant sectors at international, regional, national, subnational, and local levels.

- c) **Accountability, inclusiveness, transparency, and participation and resilience.** 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. Promote and build upon practices that encourage inclusiveness in food systems, ensuring no one is left behind in terms of economic development and food security and good nutrition. Finally, efforts should be made to improve resilient food systems that protect and reinforce ecosystem services.
- 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 sustainable consumption to protect natural resources, ecosystems and biodiversity, and ensure mitigation of and adaptation to climate change. and gender-sensitive services (extension services, nutrition services).
- 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, processing and consumption, while promoting gender-equitable practices.

Commented [A51]: I believe it could be beneficial to include the importance of a territorial approach/landscape oriented approach. Implementing a territorial approach (integrated w/landscape management) allows for a better identification of the social and ecological factors, opportunities, and gaps that present themselves in a given spatial setting.

Commented [A52]: <http://www.fao.org/3/a-i6627e.pdf>

Commented [A53]: I would go as far as to say that Food Systems for Nutrition must be resilient, and that perhaps resilience should be its own point.

See also ICN2 recommended action 12: "Recommendation 12: Establish and strengthen institutions, policies, programmes and services to enhance the resilience of the food supply in crisis-prone areas, including areas affected by climate change."

Commented [A54]: and fisheries – women make up 50% of the workforce in fisheries, although they are often underrecognized

Commented [A55]: Justification- Women are the main actors in processing SMEs both as managers and as workers worldwide.

PART 3 - THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION

33-34. 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.

34-35. 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. Applying systems thinking toward food system transformation can ensure 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.

Commented [A56]: I believe thinking systematically is different from systems thinking, and systems thinking already implies interdisciplinary.

Commented [A57]: Ok, good. So what are the elements that need to be worked through systematically to make sure we have taken a food systems approach? Where is the analytical framework? Add a reference.

Commented [A58]: Food value chains

35-36. 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.

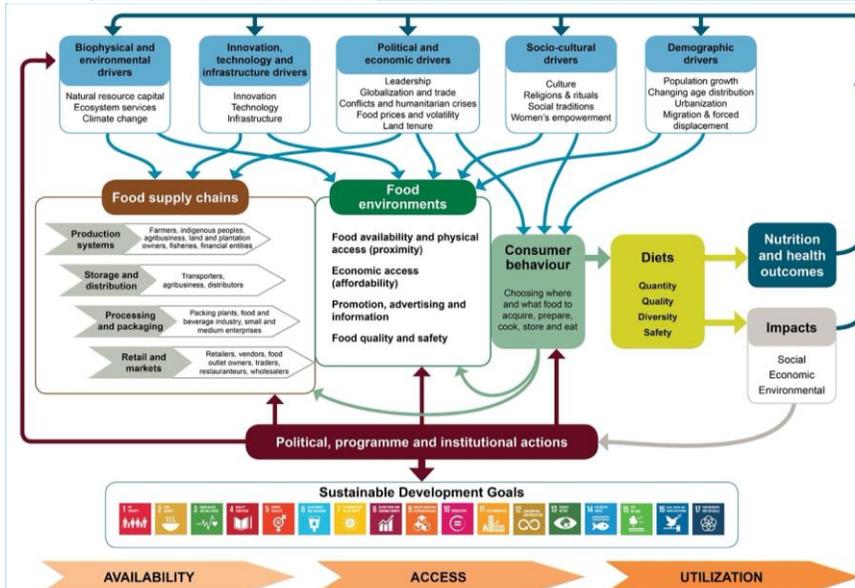
Commented [A59]: Where here is the recognition that a food system is first and foremost an economic and socio-cultural system? People will do what provides them with the benefits they seek (income, taste, acceptance) within the means they have (money, time, risk-tolerance, ...)

Commented [A60]: To be updated once the proposed edits below have been considered.

36-37. The HLPE report was structured around three main constituent elements of food systems³⁶ 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.

Commented [A61]: Not just in food preparation and caregiving, but also in food production/processing work outside of the home ... both unpaid care work and women’s work outside of the home are often underrecognized and undervalued

Figure 1: HLPE Food Systems Framework³⁷



Commented [A62]: This framework is elaborated on the consumer side and consumption, but sparse on the rest of the food system.... Taking a systems approach implies unpacking what is not simply called food supply chains...

Commented [A63]: Access to safe and clean drinking water should be a point under Food environments

Commented [A64]: A suggestion to add “management” to the natural resources capital as a driver due to its critical role in sustainability- no possible to insert the edit

³⁶ Food supply chains, food environments and consumer behaviours

³⁷ HLPE 2017b

~~37-38.~~ 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.

Commented [A65]: Either “apply a diagnostic lens to” or “undertake a diagnosis of”

3.1 TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS

~~38-39.~~ 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-policies and incentives** that promote sustainable food systems for healthy diets and improved 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 actions and policies across the food system activities with that have clear objectives of improving diets and nutrition and associated 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 international food safety standards (e.g. Codex Alimentarius and World Organization for Animal Health standards).
- 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.

Commented [A66]: Justification : if the private sector is the main actor in the food supply chains, government actors may facilitate or ensure through those plans that they promote healthy diets and lead to better nutrition outcomes.

Commented [A67]: To come from where? Has to be sustainable...

Commented [A68]: Specification of indicators “to track and assess the full cost accounting of addressing malnutrition in all its forms” is problematic. Indicators of where money is allocated across the food system? Indicators of impact on diet (food consumption)? Indicators of the prevalence of forms of malnutrition? It is preferable to leave it more open.

Commented [A69]: Expanded the title to include “multistakeholder” (this is critical), incorporating the text “in line with relevant recommendations on best MSP practices” and footnote referencing the HLPE 2018 Report “Multi-Stakeholder Partnerships to finance and improve food security and nutrition in the framework of the 2030 Agenda” to also address potential risk in recommending “problematic” MSPs that can amplify power asymmetries and deepen exclusion

3.1.2 Strengthening multisectoral and multistakeholder coordination and actions

- a) Governmental actors, intergovernmental organizations and development partners should work to **improve 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** [in line with relevant recommendations and best Multi-Stakeholder Partnerships practices](#)³⁸ that oversee the design and implementation of evidence- and science-based policies, strategies, and interventions that contribute to diet and nutrition outcomes from national to local levels, adopted in accordance with multilaterally agreed rules.

- 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 at a landscape/territorial level](#).
- c) Governmental actors, intergovernmental organizations, and civil society organizations should **encourage increased commitment to action with responsible investment**³⁹ from the public sector, private sector actors, and donors to support sustainable food systems that promote healthy diets, while considering trade-offs with other policy priorities.

Commented [A70]: Farmer & fisher or “food producer organizations”?

Commented [A71]: Points b) and c) could also be done at a landscape/territorial level

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.
- 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 \(particularly food production and processing, impacts on climate change\)](#), diets (particularly dietary intake and dietary quality [and access to safe and clean drinking water](#)), food composition, and [nutritional status](#) (including the [measurement of micronutrients-micronutrient deficiencies](#) 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

Commented [A72]: This should also include access to safe water

Commented [A73]: I think food security should include information systems on food production and processing and even data on their impacts on climate change to make the whole picture

Commented [A74]: Edited to clarify that it refers to the nutritional status of individuals rather than micronutrient content of food.

³⁸ HLPE. 2018. [Multi-Stakeholder Partnerships to finance and improve food security and nutrition in the Framework of the 2030 Agenda. Rome. http://www.fao.org/3/CA0156EN/CA0156en.pdf](http://www.fao.org/3/CA0156EN/CA0156en.pdf)

³⁹ In line with the CFS Principles for responsible investment in agriculture and food systems, RAI (2014).

a comprehensive manner to support the planning, monitoring, and evaluation of programmatic actions.

3.2 SUSTAINABLE FOOD PRODUCTION AND SUPPLIES FOR IMPROVED DIETS AND NUTRITION IN THE CONTEXT OF CLIMATE CHANGE and natural resources degradation

~~39-40.~~ 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~~ production

- 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 **facilitation of the access** to finance, insurance, forecasting data and methods, **promotion of local community saving and insurance schemes** and immediate help through service apps (e.g. to identify plant diseases and parasites). Assistance could also include **access to services for** 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 **developing and adopting drought resistant varieties that are also adapted to social and economic conditions**, as well as productive-asset creation initiatives (e.g. rehabilitating degraded land and infrastructure development, **irrigation**).
- b) Governmental actors, intergovernmental organizations, NGOs, and private sector actors should support and assist farmers and other food producers to **reduce negative the environmental impacts** of food systems. This could be done by fostering the adoption of appropriate technology and on-farm management practices to improve crop yields, **and reduce crop vulnerability, agrochemicals and antimicrobial pesticide usage, and prevent inappropriate use and overuse of fertilizers**. Governmental actors should promote optimization of agricultural outputs per unit of **water, energy, soil, and land**, and reduce greenhouse gas emissions, biodiversity loss, and natural resource degradation of agriculture activities. **This should be planned by applying land resources planning approaches within a landscape and involving all stakeholders.**
- 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.
- 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.

Commented [A75]: This seems more inclusive – maybe this is what the above mentions of “farmers” or “farmer association” should be in 3.1.2.b?

Commented [A76]: Include also facilitation access in the cases where the private sector is the provider

Commented [A77]: For example Fondos Mutuos de Contingencia in Central America

Commented [A78]: Assistance could also include access to services for protecting crops, etc. when private sector is the provider

Commented [A79]: Farmers can also participate in breeding – see article 6 of the International Treaty on Plant Genetic Resources for Food and Agriculture.

Commented [A80]: Socio-economic factors are essential to sustainable crop production.

Commented [A81]: Edited to clarify that it is the negative impacts that should be reduced.

Commented [A82]: Perhaps instead of ‘reduce’ it would be more appropriate to say responsible use of, i.e. when adequate pest control techniques are used in combination with a range of other agricultural practices to control pests

Commented [A83]: On-farm management contributes to reducing vulnerability, including by broadening the genetic base of crops.

Commented [A84]: And feed if we are including animals in “agricultural outputs”

Commented [A85]: this should happen involving all stakeholders and applying a landscape approach and based on land resource planning

Research should focus on potential interventions and policy entry points to ensure agricultural and food 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. In particular, special attention should be paid to efforts to reduce and eliminate the use of plastics within the food system.

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

- a) Natural resources and biodiversity for food and agriculture play an essential role in ensuring resilient food systems, as well as diverse and adequate nutrition for all. It is therefore crucial that food systems guarantee the sustainable use and conservation of natural resources and biodiversity.
- b) Governmental actors and farmers, agricultural producers 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 sustainable soil management practices, and implement the soil fertility management from recommendations in the s per the Voluntary Guidelines for Sustainable Soil Management (VGSSM), to maintain and increase crop plant productivity in a sustainable way, and provide appropriate incentives for the use of sustainable land-soil management services and agricultural practices to maintain soil biodiversity and nutrient balance, and promote carbon storage within a landscape approach and nutrient cycling and prevent soil pollution.
- c) Governmental actors should establish systems for monitoring the production, distribution (including sale), quality, management and use of fertilizers following the principles of the International Code of Conduct for the sustainable use and management of fertilizers (The Fertilizer Code), to ensure sustainable food production, end malnutrition, enhance food security and nutrition, reduce pollution and improve the food safety by promoting integrated, efficient and effective use of quality fertilizers.
- d) Governmental actors should improve the integrated management and control of water resources for agriculture and food production – especially considering freshwater fisheries and aquaculture through improved regulation, community participatory approaches, and water stewardship approaches that involve civil society organizations, private sector actors, and other stakeholders.
- e) Governmental actors should mainstream biodiversity⁴⁰ into all policies and programmes across agricultural sectors, and foster healthy ecosystems through the protection, conservation, and sustainable use of biodiversity of relevance to food and agriculture at ecosystem, species and genetic levels, , productive systems that include diverse crops and livestock biodiversity (including that of, neglected and underutilized species), forest-tree biodiversity, the biodiversity of fished and farmed aquatic organisms, and the biodiversity that underpins food and agricultural production (including, forestry, fisheries and aquaculture) by providing services such

⁴⁰ Biodiversity mainstreaming across the agricultural sectors is the process of embedding biodiversity considerations into all policies, strategies and practices that are adopted by public and private actors who either depend on biodiversity or whose actions have an impact on biodiversity. For more information, please see: <http://www.fao.org/3/CA2403EN/ca2403en.pdf>.

Commented [A86]: This is unclear. Mitigation in the context of agriculture and climate change relates to the reduction of the contributions of production systems to climate change, e.g. through the emission of GHGs.

Commented [A87]: We cannot be silent on the use of plastic which is destroying the environment and fish are consuming plastics and making its way into the food chain.

Commented [A88]: Natural resources are referring to land and water. It is important to also include biodiversity

Commented [A89]: Included this excerpt to make link between biodiversity, resilient food systems, and nutrition clearer in the text.

Of note, FAO will be publishing later this year a Policy Guidance Note on the nexus between biodiversity and nutrition, in partnership with Bioversity International.

Commented [A90]: The term farmers refers only to a part of agricultural producers and excludes fisherfolk, foresters and pastoralists to mention a view all of which produce food.

Commented [A91]: <http://www.fao.org/3/a-bl813e.pdf>

Commented [A92]: Term crops is limiting and does not include plantation and fruit trees, tea, coffee etc. The statements refers to all plants that are being cultivated.

Commented [A93]: I input “especially including fisheries” – as freshwater management for agriculture and food production needs to consider if diversion of water will impact fisheries

Commented [A94]: Mainstreaming is crucial in ensuring the sustainable use and management of natural resources in food production, and an important work stream of FAO.

The concept (which was also added in a footnote) is in line with the recently approved FAO Strategy on Mainstreaming Biodiversity across Agricultural Sectors (please see CL 163/11 Rev.1: <http://www.fao.org/3/ca7175en/ca7175en.pdf>).

Likewise, reference is made to the “Voluntary Guidelines for Mainstreaming Biodiversity into Policies, Programmes and National and Regional Plans of Action on Nutrition” (<http://www.fao.org/3/a-i5248e.pdf>), the “Cancún Declaration on Mainstreaming the Conservation and Sustainable Use of Biodiversity for Well-Being” (https://www.iucn.org/sites/dev/files/content/documents/cancun_declaration-en.pdf), and FAO’s Council request to facilitate mainstreaming (please see C 2017/REP, paragraph 55: <http://www.fao.org/3/a-mu208e.pdf>).

Commented [A95]: Healthy ecosystems are the basis for the protection, conservation and sustainable use of biodiverse, productive systems

as pollination, pest control and nutrient cycling.⁴¹ ry and plantations, fisheries and sustainable aquaculture as well as bBiodiverse productive/biodiverse landscapes including rangelands, trees/seascapes that include, as appropriate to local circumstances, croplands, pastures, ~~ag~~ including forests, and plantations, fisheries, fish farms and a diverse range of other habitats should be fostered ~~water and coastal seas~~. This should be complemented through involve the adoption and application of sustainable food production and natural resource management practices, including agroecological and other innovative approaches⁴² in a manner that is biodiversity friendly and economically viable for in terms of allowing all legitimate tenure rights holders to uphold those rights and maintain livelihoods. Biodiversity should be mainstreamed into policies, programmes and national and regional plans of action on nutrition⁴³ and into national climate change adaptation planning.⁴⁴

f) Governmental actors should protect the rights of Indigenous Peoples,⁴⁵ small-scale producers, pastoralists, 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.

e.g) Governmental actors should learn and protect indigenous peoples' food systems. Their ways of generating food by combining a deep understanding of the environment and its relations has enabled them to fine tune Indigenous peoples' traditional knowledge that ensures food, while protecting biodiversity through sustainable territorial management systems that combine hunting, harvesting, fishing, shifting cultivation and nomadism. The adaptability of indigenous food systems over the past centuries to climate variations, disease outbreaks and displacements is not sufficiently understood by science and thus more research is needed to provide evidence from existing sustainable indigenous food systems.

3.2.3 Promoting nutrition within agriculture and food production

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

⁴¹ FAO. 2019. *The State of the World's Biodiversity for Food and Agriculture*. Rome.

⁴² 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.

⁴³ FAO. 2016. *Voluntary Guidelines for Mainstreaming Biodiversity into Policies, Programmes and National and Regional Plans of Action on Nutrition*. Rome.

⁴⁴ FAO, 2015. *Voluntary Guidelines to Support the Integration of Genetic Diversity into National Climate Change Adaptation Planning*. Rome.

⁴⁵ United Nations Declaration on the Rights of Indigenous Peoples (<https://undocs.org/A/RES/61/295>), and the C169- Indigenous and Tribal Peoples Convention, 1989 (No. 169) of the International Labour Organization (https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C169).

Commented [A96]: Applies to all not just aquaculture.

Commented [A97]: This edit is intended to fill some gaps and provide a more easily understandable structure. It starts by listing components of biodiversity (the main categories directly used in production followed by "associated biodiversity") and then moves on to landscape features.

Commented [A98]: This edit is made because the adoption of these practices would presumably be part of rather than complementary to the activities mentioned in the preceding sentences.

Commented [A99]: This edit is an attempt to address the confusing sentence structure. I guess something like this is what is meant.

Commented [A100]: This may need a footnote or a reference, to ensure the term "legitimate" is understood in context. Are there any illegitimate tenure rights holders?

Commented [A101]: The Commission on Genetic Resources for Food and Agriculture has endorsed voluntary guidelines on this (see footnote).

Commented [A102]: Particularly given the heading of Section 3.2, this is also relevant. The Commission has again endorsed voluntary guidelines (see footnote).

Commented [A103]: Rationale for inserting this footnote: Initial article 28. of the VGFSyN states that the VGFSyN should be interpreted and applied consistently with existing obligations under relevant national and international law and other agreed international human rights instruments. In part Part 3.2, this paragraph develops on the specific issues faced by indigenous peoples. Hence, we think relevant to specify on the rights of indigenous peoples.

Commented [A104]: This is an optional extra given the catch-all "other communities", but it seems at least as relevant and logical as listing both "peasants" and "small-scale producers".

Commented [A105]: I know edits rather than comments are requested, but there seems to be problem with the structure and logic of this list. I have no specific editorial suggestions.

Commented [A106]: Rationale for adding this paragraph.

Rational:
The 2019 IPBES Global Assessment Report on Biodiversity and Ecosystem Services and many other scientific publications highlight that ecosystems and biodiversity are better preserved in indigenous territories and they are generally declining less rapidly in indigenous peoples' land than in other lands.

This is strongly related to their ancestral food systems. It is important that States take measures to preserve and protect their ancestral food and knowledge systems, in

- 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-plants and animal-source foods** that contribute to healthy diets, while ensuring a decent income, livelihoods and resilience for farmers, particularly ~~smallholders and/or~~ family farmer~~s~~, and farm workers. This should include supporting and encouraging sustainable ~~crop,~~ livestock, ~~agroforestry,~~ ~~animal-aquaculture~~ and fishery ~~and forestry~~ 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 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-plant and animal-source foods~~ for markets. ~~Additionally access to other productive services as, finance, markets and infrastructure (water harvesting, terraces, irrigation) needs to be facilitated.~~
- 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 systemic multi-disciplinary research, development, and innovation** for producing nutritious crops, such as fruit, vegetables, nuts and seeds, legumes, biofortified crops (developed through conventional on-farm breeding), and ~~diverse animal-source foods and breeding~~ (e.g. dairy products, fish, eggs, and meat), which are developed ~~in a participatory manner closely with keeping smallholder and/or family farmers' farmers to improve their 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, ~~cold chain,~~ physical markets, ~~electricity,~~ market information systems) to prevent postharvest loss and ensure smallholder farmers ~~and fishers~~ and small and medium-size enterprises (SMEs) are able to deliver diverse, perishable, safe food~~s~~ to markets in sustainable ways.
- b) Governmental actors, private sector actors, and ~~farmers-food producers~~ and their associations should **facilitate minimizing food and nutrient loss** ~~on farms at harvest,~~ during post-harvest storage, and throughout processing, transportation, and retail (particularly perishable foods

Commented [A107]: This edit is made because the original read strangely (most crops are food) and because I guess that this is what is meant, i.e. food from livestock, fish, etc.

Commented [A108]: The term family farmer has been defined by the UN Decade on family farming as inclusive term referring to scale and all agricultural production systems.

Commented [A109]: Edited for the sake of completeness

Commented [A110]: If we highlight this mixed integrated system we would need to highlight also others such as integrated crop-livestock systems.

Commented [A111]: This edit is made because "animal" (at least terrestrial animals) is covered under "livestock" and because aquaculture was missing.

Commented [A112]: When this deletion is not considered, "small-scale" fisheries should be used rather than "artisanal" to keep consistent with the Voluntary Guidelines for Small Scale Fisheries (I included the link in a previous page)

Commented [A113]: I generally do not like the term modern as modern is old-fashioned tomorrow and there are ...

Commented [A114]: This implies a top down approach where we rather support tools like farmer field schools and ...

Commented [A115]: We cannot limit the message just to one sector!

Commented [A116]: There is a point missing here – providing family farmers with opportunities for direct ...

Commented [A117]: Market information on animal-source-food is usually less developed than for nutritious ...

Commented [A118]: They should not be highlighted as the same could be done for bee products, adapted local ...

Commented [A119]: It is very important that we move away from sectorial approaches to more integrated ones.

Commented [A120]: "and breeding" deleted because it appeared to make no sense in the context (a list of types ...

Commented [A121]: Should the sustainable production aspect be included here as well?

Commented [A122]: Top down approaches do not work at least in the livestock sector. ...

Commented [A123]: Electricity is key in post-harvest activities such as cold-chain and processing

Commented [A124]: There are also fisher organizations

Commented [A125]: Planning production according to demand and short market circuits could also reduce losses,

Commented [A126]: "harvest" can include both farms and fisheries

such as fruits, vegetables, dairy, eggs, fish and meat). Facilitation includes training and capacity on improved management practices and fostering the adoption of appropriate technologies⁴⁶, as well as the planning of production according to demand and the promotion of local markets to shorten circuits.

- c) Governmental actors should **establish guidance on the use of processing technologies**⁴⁷ and access to processing technologies 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 of high 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.
- 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 – including fresh and minimally processed foods and food products that contribute to a healthy diet, 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 in food processing (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, and that there is no hazardous conditions, inappropriate division of tasks, including involvement of children in harmful tasks (e.g. child labour).
- 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.**

⁴⁶ Technologies include cold chambers storage units, solar walk-ins, refrigerators, dry storage, storage drums and drying facilities.

⁴⁷ 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.

Commented [A127]: Facilitate the access to processing technologies via easing import of processed technologies with low tariffs or financing R&D for its domestic production

Commented [A128]: I think fresh and minimally processed foods should be mentioned in this item about FBDGs. Otherwise it seems totally oriented toward processed foods (food reformulation, etc.)

Commented [A129]: increasing nutrient content through food fortification or through improved methods to retain nutrients/reduce excessive content of harmful ingredients?

Commented [A130]: This seems totally out of place here (at least b and c), but I presume it cannot be changed. It fits better under item 3.3.

Commented [A131]: Something to consider is that many people in food systems related work, especially in urban areas in HICs but also migrant workers, farmers, etc., do not have a living salary and rely on food banks. I wonder if we should say anything in regard to food banks, such as framing their relevance and how to ensure they are not structural (necessary due to bad practices) but rather transitory/ for situations of acute need. Perhaps that can be integrated here? That reinforces what we say later, that these food assistance programmes should be nutritious, and support smallholders through public procurement, this type of thing (highlighting the rural-urban linkages).

Commented [A132]: There is a lot of occupational health and safety issues in the food processing industries (e.g. slaughter)

Commented [A133]: The use of this wording is incorrect. Slavery is only one of the four worst forms of child labour. What you describe, in loose terms, is child labour. However, to be fully correct and comply with internationally recognized conventions, you should consider re-wording as suggested to be technically correct.

Commented [A134]: Should this include nutrition education/awareness raising? Access to nutritious foods should be accompanied by awareness raising/knowledge about the benefits?

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).

d) Government actors, private sector actors, non-governmental organizations, and communities should take relevant measures to ensure due diligence in food systems and protect children and youth from hazardous work and inappropriate work burden many children and under-age youth shoulder in rural areas because of food insecurity, which leads to undernutrition and wasting.

e) Governmental actors, intergovernmental organizations, and private sector should support indigenous peoples youth organizations, in particular by providing them with intercultural programmes that enable them to protect the transmission of their traditional knowledge in relation to food systems and climate change; intercultural education; and job opportunities.

Commented [A135]: This addition complements well the previous points which respectively focus on the issues of access (a. to assets, c.to technology), and education/skills development/human capital(b.). Here, it adds the dimension of protection (from harm) and legal accountability of food systems vis-à-vis youth protection, ultimately contributing to empower youth across food systems.

Commented [A136]: Rationale for adding a paragraph on indigenous youth.

Rational

Indigenous youth have a key role in preserving the indigenous peoples' knowledge, food and territorial management systems that have allowed them to inhabit the same territories for thousands of years, without depleting the natural resources base.

3.3 EQUITABLE ACCESS TO HEALTHY DIETS DELIVERED BY SUSTAINABLE FOOD SYSTEMS

40-41. 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 life⁴⁸, 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.

⁴⁸ FAO. 2004. Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security. Paragraph 15.

3.3.1 Improving access to foods that contributes to healthy diets

- a) Governmental actors should improve the availability and access of nutritious foods that contributes to healthy diets through **trade and investment agreements and policies**, 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, **pastoralists, small-scale fisherfolk**, people facing physical constraints due to age, illness, or disability, **women** and people living in rural areas have sufficient **access to** 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 to** sell affordable nutritious foods that contribute to healthy diets, and that **restrict the growth of retail outlets** which sell an overabundance of foods **of high** ~~in~~ energy density with minimal nutritional value, and promote home food production and gardens, where appropriate.
- d) Governmental actors should **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 of high** ~~in~~ energy density with minimal nutritional value **in all areas, and low-income areas in particular**.
- 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 foods that contributes to healthy diets

- a) Governmental actors should **consider fiscal policies to promote the affordability** of healthy diets. This includes subsidies to promote nutritious food options to ensure they are affordable and competitive compared with foods and beverages **of high** ~~in~~ energy density with minimal nutritional value for **which industry tax benefits** for their development and marketing should be removed.
- b) Governmental actors should **strengthen public procurement systems and orient them toward** 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

Commented [A137]: It shouldn't matter if they have been marginalized historically or not.

Commented [A138]: Cover all sectors where marginalized producers occur.

Commented [A139]: Grammatical correction.

Commented [A140]: Does the UNDRIP refer to all the vulnerable groups listed?? This sentence needs to be revised but I do not know how because I do not know the UNDRIP.

Commented [A141]: I can't help but feel there is a better way to frame this. What about that encourage the development of healthy food environments, that rectify the instances of food swamps/food deserts and limit (through strategic policy, such as taxation, education, or guidelines) consumption of highly-processed foods with minimal nutritional content.

Commented [A142]: Independent of concentration. You may have only one vendor but with huge outreach that squeezes smallscale vendors from the market.

Suggest to replace this with "easy availability of foods"

Commented [A143]: The section 3.2.2 on affordability of nutritious food makes recommendations about government interventions (subsidies, food procurement etc.). The only private level action considered is home gardens which again should be promoted by governments. I think this is too limited by not involving other stakeholders and their role in contributing to nutrition and healthy diets. I wonder what the role of private sector is, the civil society and the development agencies on making healthy diets more affordable. SOFI 2020 provides analysis and policy recommendations in this direction.

Commented [A144]: This should also include the promotion of home vegetable gardens, including urban and peri-urban agriculture

Commented [A145]: Should there be consideration here for policies that tax these foods/drinks? Sugar tax?

Commented [A146]: Edited because public procurement systems are not strengthened by ensuring healthy diets in public institutions. Rather public procurement systems should be used to promote healthy diets. The sentence was illogical.

Commented [A147]: Institutional markets (for example school feeding) combined with nutrition education

UN agencies should consider **promoting home grown school meals**, where foods served in schools ~~is-are~~ procured from local, ~~smallholder and/or~~ family farmers, ~~and fisherfolk.~~

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 foods that contribute to healthy diets through **local farmers markets, home gardens (including urban agriculture), community cooperatives and other community-building efforts** that engage people around local food cultures.

e)f) Governmental actors and intergovernmental organizations should promote the access to markets of indigenous peoples foods by promoting indigenous peoples ran food markets

Commented [A148]: See above – small holder is superfluous

Commented [A149]: There is some evidence of fish from local fisherfolk being included in school meals

Commented [A150]: Rationale for adding this paragraph

There is no mention on how to support indigenous peoples' access to markets.

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, including information on how to prepare healthy meals.

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

Commented [A151]: And provide nutrition education, including how to prepare these healthy meals.

Commented [A152]: Monitoring and control is also needed for various outdoor advertising techniques, including billboards, banners, point of sale displays and others that equally influence consumer behavior.

Commented [A153]: If possible produced by local farmers

3.4 FOOD SAFETY ACROSS SUSTAINABLE FOOD SYSTEMS

~~4.1.42.~~ 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. Foods cannot be considered nutritious if ~~it is~~ they are 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 foods because of the potential spread of food borne-related illness.

Commented [A154]: Add antimicrobials

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 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 legislation and regulations to ensure that food producers and suppliers throughout the food supply

Commented [A155]: It is important to stress that food safety policies are adapted to family farmers. Often they are excluded because family farmers are unable to meet the requirements.

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.

- 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 [water quality](#), pesticide residues, [fertilizer residues](#), antimicrobial residues, endocrine disrupters, chemical and unsafe food additives, [pathogenic bacteria](#), viruses, [toxins](#), parasites, and fraud/adulteration of food products.

Commented [A156]: For example, heavy metals, harmful microbes, and other dangerous or toxic materials from fertilizers (foliar).

Commented [A157]: Safe water is an important issue in this regard

3.4.2 Ensuring food safety across food production systems

- a) Governmental actors and private sector actors should **consider a One Health Approach**⁴⁹ 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 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 adopt scientifically, [risk-based practices](#) that can provide safe food while retaining their nutrient content.
- c) Governmental actors should understand and 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 standards, where available, as with any new food product in international regulatory frameworks.

Commented [A158]: Soil health and access to safe water are important

⁴⁹ 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/>

3.5 PROTECTION OF FOOD CULTURE AND ENABLING PEOPLE TO IMPROVE THEIR FOOD PRACTICES FOR HEALTHY DIETS SOCIAL RELATIONS, KNOWLEDGE AND CULTURE OF DIETS

42.43. 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 promote healthy diets through supporting people to improve their knowledge, motivations, skills and practices access to knowledge, awareness, education, and the quality of information available to people on nutritious food, healthy diets and nutrition as a way to empowering people and key actors across food systems; and improving places the environments in which people access foods in their daily lives. Context-specific interventions and promotion of traditional healthy 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 food environment and consumer-centred policies and tools to provide education and information on promote healthy diets

- a) Governmental actors, supported by partners, should develop and implement evidence-based national food-based dietary guidelines that respond to a country's public health, nutrition and related sustainability priorities and that use a multisectoral process and food systems approach for different age groups that define context-specific, diverse, healthy diets by taking into account social, cultural, scientific, economic, ecological and environmental drivers to promote policy coherence (e.g. food and nutrition education, health, food and agriculture, social protection, fiscal, etc.) for healthy diets.
- b) Governmental actors, together with partners (including civil society organizations, NGOs and UN agencies) should promote, design, implement and evaluate contexts community-based food and nutrition education programmes to improve, change and/or consolidate priority food and nutrition behaviours⁵⁰. These programmes should follow international best practice (needs and evidence-based, behavior-focused, context-specific, hands-on, owned by people, inclusive of influencers of changes, adequate dose and duration, and supported by food environment policy and system change), 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.
- c) Governmental actors should adopt and implement comprehensive school food and nutrition policies and programmes, which feature, review high-quality hands-on education curricula that incorporates competence-based food and nutrition principles education, involve communities involvement, promoting and creating healthy food environments (e.g. setting school meal nutrition standards, regulating the sale and marketing of foods in and around

⁵⁰ Food and nutrition education is designed to improve/change/consolidate a wide range of behaviours or practices according to the main identified needs, including food selection, homestead production, preparation and food safety, intrahousehold food distribution, breastfeeding and complementary feeding, disposing of food, etc.

Commented [A159]: That was an odd title for this section. Most of the other section titles emphasize an important aspect to be promoted or preserved, but this title is confusing.

I suggest using "protection of food cultures", as promoted by FAO <http://www.fao.org/agroecology/knowledge/10-elements/culture-food-traditions/en/> and UNESCO <https://en.unesco.org/events/food-culture-social-inclusion-sustainable-development-and-cultural-identity>

Commented [A160]: This title is not at all adequate for the recommendations below.

Commented [A161]: The terminology used was not aligned with the evidence. There is overemphasis on information and knowledge, when key evidence has shown that information is not automatically translated into improved knowledge, and that knowledge is not automatically translated into improved food behaviours and practices, e.g. <https://www.ncbi.nlm.nih.gov/pubmed/18296331> <http://www.fao.org/nutrition/education-nutritionnelle/professional-training/enact/fr/>

Terms such as "education", "information", "SBCC", "counseling", "knowledge" and "awareness" are used almost interchangeably when these are not. https://www.sneb.org/past-webinars/free/whats-in-a-name/?back=Past_Webinars

Commented [A162]: Consumers are also key actors across food systems

Commented [A163]: The title was changed to fit the content and to use terminology aligned with the FS framework, and to showcase the need for complementarity.

Commented [A164]: Should be combined with use of safe and clean drinking water

Commented [A165]: <http://www.fao.org/nutrition/education/food-dietary-guidelines/en/>

Commented [A166]: This has been moved as the nature of the recommendation was not well fitting in the original section.

The following references justify the best practices addition: <http://www.fao.org/nutrition/education-nutritionnelle/professional-training/enact/fr/>

Commented [A167]: See: <http://www.fao.org/nutrition/education/professional-training/en/>

Commented [A168]: As suggested by FAO. See <http://www.fao.org/nutrition/education>

- schools, information environment, provision of safe drinking water, etc.) and healthy diets in schools, and support school health and nutrition services, including physical education.
- d) Governmental actors should **develop nutrition standards as a basis to ~~and restrict~~ the promotion and marketing** (including digital marketing, sponsorship, advertising) of foods of high energy density with minimal nutrition value (including sugar-sweetened beverages), ~~promotion and sponsorships exposure, especially of~~ to 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.~~
 - e) 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 Substitutes⁵¹ and subsequent WHA resolutions.
 - f) Governmental actors should **regulate nutritional labelling and consider front-of-pack labelling (FOPL) combined with nutrition education** 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. 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 NCD preventions (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.
 - g) Governmental actors should provide incentives to private sector actors to **design food outlets including markets, restaurants, and other places** where foods are sold or served that encourage options (e.g. by encouraging the placement and promotion of foods) ~~that which contribute to healthy diets in retail spaces.~~
 - h) Governmental actors, UN agencies, NGOs, and ~~medical and health practitioners services~~ should **consider coupling-integrate nutrition education and counselling to populations participating within** maternal and child nutrition programmes, and also as core element of school curricula.
 - i) Governmental actors, supported by UN agencies, NGOs, and medical and health practitioners should **promote a range of behavior change interventions such as social and behavior change communication (SBCC), food and nutrition education and social marketing and social support interventions** as a way to positively influence knowledge, attitudes behaviors 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).
 - j) 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.

Commented [A169]: This was moved as it did not fit the section below, plus it is a key example of holistic programmes that create synergies within food environment and consumer demand.
<http://www.fao.org/3/ca4091en/ca4091en.pdf>
<http://www.fao.org/3/CA2773EN/ca2773en.pdf>
<http://www.fao.org/school-food/en/>
<http://www.schoolsandhealth.org/fresh-framework>
https://www.who.int/nutrition/topics/NFSI_Briefing_presentation.pdf

Commented [A170]: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6213388/>
<https://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1003015>

Commented [A171]: Giving preference to locally produced foods?

Commented [A172]: changed for clarity purposes and to better showcase choice architecture if this was the original meaning..

Commented [A173]: Also school feeding, community/home gardening, urban agriculture

Commented [A174]: In many ways, SBCC is synonymous with nutrition education. By using so many different terminologies in this section (education, information, knowledge, awareness, SBCC, social support interventions, etc.) there is a risk that guideline users will be confused.

FAO uses and promotes the term “food and nutrition education”. (<http://www.fao.org/nutrition/education>), so I would suggest using thIS expression all throughout.

Commented [A175]: What is key is not to simply provide information or passing on knowledge, but to change behaviors, which is largely achieved by training and skill-development, motivation rising, etc. See <http://www.fao.org/nutrition/education>

Commented [A176]: I deleted the sentence on aligning FBDG to guidelines to reduce food waste because it does not make sense.

FBDG are evidence-based dietary (and lifestyle) messages aimed at promoting optimal health. See <http://www.fao.org/nutrition/education/food-dietary-guidelines/en/> FBDG **need not** be aligned with policies or programmes to tackle food waste. That’s a separate issue, that could be brought in a FBDG booklet as part of advice for the population; but food-based recommendations are never developed considering food waste.

⁵¹ [International Code of Marketing of Breast-Milk Substitutes](#). WHO, 1981. Geneva.

3.5.2 Encouraging Safeguarding positive 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 ~~acknowledge and~~ the importance of sociocultural norms, relations and structures in influencing diets, and the role of food in shaping society and culture ~~in cultural heritage, culinary skills and nutrition literacy among communities.~~ This can be done through interventions that support anthropological research, revalorize traditional and underutilized nutritious foods, apply territorial approaches, promote awareness around food sustainability in all its dimensions, and safeguard food culture as heritage ~~community and consumer associations and educational institutions, targeting men and women.~~
- c) Governmental actors should **protect and promote the good knowledge that Indigenous Peoples** have with regard to local traditions and methods of producing, preparing, and preserving foods that imparts nutritional and environmental benefits.
- 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 and food service staff, supermarket buyers, influencers on social media, youth leaders, farmers and food producers, young entrepreneurs, mayors and local communities).~~

Commented [A177]: Equally important is to **identify and target the many widespread harmful social norms and practices** that are present in many long-standing food cultures. I suggest creating a separate point in this regard.

Commented [A178]: moved to section 3.5.1. as it better fits that section

Commented [A179]: The levels here and elsewhere are very confusing...

Commented [A180]: Applying territorial approaches

Commented [A181]: <http://www.fao.org/3/ca6640en/CA6640EN.pdf>
<https://ich.unesco.org/en/lists?text=food&inscription=&country=&type=>
<https://www.sciencedirect.com/science/article/abs/pii/S0963996918308135?via%3Dihub>
<https://www.jblearning.com/catalog/productdetails/9781284078008>

Commented [A182]: Important to include the main aim, or the “for what”

Commented [A183]:

Commented [A184R183]: Training on “nutrition” for health professions typically means teaching about nutrients and human digestion and metabolism, but this knowledge alone is by far not enough for them to be good agents of behavior change.

Thus, it’s important not only to teach about nutrition, **but also about nutrition education and behavior change approaches:** for health professionals to understand the psychosocial determinants of dietary choices and to better assist individuals in making dietary changes.

Commented [A185]: Propose adding a paragraph regarding the Global Hub on Indigenous Food Systems

Rationale for this additional para:
FAO in coordination with indigenous peoples and research centres and universities have joined forces to launch a Global Hub to generate knowledge on indigenous food systems, and to provide inputs to global discussions on climate change and sustainable food systems.

Commented [A186]: moved to section 3.5.1 as it better fits that section

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

- a) Universities and technical schools should **institute nutrition and a tailored nutrition education curriculum** for all medical, nursing, health, teaching, and agriculture, and food technology and extension students during training.
- b) Governmental actors, civil society organizations and UN agencies should **promote culinary food 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.
- ~~b)c)~~ Governmental actors, universities, research centres and intergovernmental organizations, should join the Global Hub on Indigenous Peoples Food systems launched in 2020 as part of the UN Decade of Action on Nutrition, where indigenous representatives, their UN mechanisms and indigenous peoples organizations will share some of their knowledge about sustainable food systems and nutritious edibles that are not part of the mainstream food supply.
- e)d) ~~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).~~

Commented [A187]: moved to section 3.5.2 as it better fits that section

3.6 GENDER EQUALITY AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS

43-44. 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. ~~and often face higher levels of food insecurity and worse nutrition outcomes than men.~~ Therefore, women's and girl's empowerment through education, ~~collective action,~~ 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.

Commented [A188]: I would rather give the percentage of women producers – see SOFA than this statement as in all countries women will be involved in producing food.

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

Commented [A189]: Access of women producers information and knowledge should be listed as separate point.

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**⁵² including access to **adequate tools that** ~~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-management** 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.

Commented [A190]: Often tools are too big or heavy for women as they were designed for men or tools for women specific work do not exist e.g. tool to crash cashew nuts decreases labour and time and increases price

Commented [A191]: The term business management is broader than business budget as it encompasses also knowledge on entrepreneurship and market linkages.

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).

Commented [A192]: Why is the negative part in the header needed?

3.7 RESILIENT FOOD SYSTEMS IN HUMANITARIAN CONTEXTS

44-45. 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~~ **millions, which** increases their risk of food insecurity and malnutrition. Considering the importance

Commented [A193]: This section is mostly focused on EW, DRR and safety nets for vulnerable and crisis affected populations. There should be some guidance for strengthening food systems, particularly food supply function of food systems in the face of shocks, e.g. options for local food producers, traders and other actors as well as government responses, e.g. food stocks, trade agreements, ...

⁵² 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.

Commented [A194]: A critical element of resilience is strong institutional and human capacities. These are what set apart the countries whose food systems collapse with every shock from those that withstand crises. This has not been treated under this section.

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)⁵³.

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 **socially /culturally** acceptable, and not harm local markets. Foods must conform to the food standards of the host country's government 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 foods 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

Commented [A195]: Suggest to delete as it is only one of many approaches and types of assessment. No other monitoring initiatives are specifically named anywhere in the document.

Commented [A196]: Why not just say "encouraged to purchase local produced food"? Why mention these foods in a document on food systems guidelines? I feel like acute malnutrition management programmes are more a part of the health system than the food system.

⁵³ CFS Framework for Action for Food Security and Nutrition in Protracted Crises

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 foods** that ~~is~~are 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. Ecosystems that provide disaster risk reduction services should be conserved or restored. Where appropriate, diversified production strategies (e.g. mixed systems and/or use of multiple species, varieties, etc.) should be utilized to hedge against climate-related and other risks. Governmental actors should aim to restore local seed systems, including through the implementation of Farmers' Rights as set out in the International Treaty on Plant Genetic Resources for Food and Agriculture, food production and market accessibility as rapidly as possible. Resilience should be strengthened through sustainable land management practices, rainwater harvesting, local saving and credit schemes.
- 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**

Commented [A197]: The justification for this edit is that it seems to be a relevant point. Various ecosystems provide protection against storms, floods, landslides, etc.

Commented [A198]: This is another way in which biodiversity can contribute to resilience.

Commented [A199]: An important component of local food production, particularly in emergency disaster situations. See art. 12.6 of the International Treaty on Plant Genetic Resources for Food and Agriculture.

Commented [A200]: The International Treaty on Plant Genetic Resources for Food and Agriculture recognizes the enormous contribution that the local and indigenous communities and farmers of all regions of the world have made, and will continue to make, to the conservation, development and use of plant genetic resources as the basis of food and agriculture production throughout the world. The implementation of the Farmers' Rights, as set out in the Art. 9 of the International Treaty, may be one of the immediate, accessible and rapid ways to restore local food production.

Commented [A201]: Additionally to disaster risk reduction, it is important to build resilience and preparedness of communities for these recurrent events through sustainable land management practices, rainwater harvesting, local saving and credit schemes, seed banks

Commented [A202]: This section should provide a guidance on priorities in implementation in relation to seven focus areas discussed in the guidelines. Even if all focus areas have equal priorities by order of implementation to achieve sustainable food systems – this could be mentioned as well. Ideally, the guidelines should identify priorities of implementation by main implementers, e.g. government, UN, civil society, private sector,... This would make the guidelines more helpful for the users.

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 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 in line with relevant recommendations and best Multi-Stakeholder Partnerships practices**⁵⁴, 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. To achieve sustainable results at scale particularly at country level, a system-wide capacity development approach needs to be applied that empowers people, strengthens organizations, institutions, networks, multi-stakeholder platforms and processes as well as a more conducive policy environment⁵⁵, particularly among nutrition and food system actors, to reshape food systems in a country-driven matter to deliver balanced healthy and sustainable diets, and to promote adequate food habits.

~~53-54.~~ 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.

Commented [A203]: This is odd here to single out one group. Maybe add others too e.g. Global Panel for Agriculture and Food Systems for Nutrition, Global Nutrition Report, etc.

Commented [A204]: Added this paragraph 53 as follows and footnote referencing the FAO Elsevier 2019 book publication Chapter titled "System-Wide Capacity Development for Sustainable Food and Agriculture" (See page 458-463 in <https://www.sciencedirect.com/book/9780128121344/sustainable-food-and-agriculture> to emphasise the need for "business as unusual", "latest thinking" when enhancing the capacities of all stakeholders

⁵⁴ HLPE. 2018. *Multi-Stakeholder Partnerships to finance and improve food security and nutrition in the Framework of the 2030 Agenda*. Rome. <http://www.fao.org/3/CA0156EN/CA0156en.pdf>

⁵⁵ FAO and Elsevier. 2019. "System-wide Capacity Development for Sustainable Food and Agriculture" in "Sustainable Food and Agriculture (SFA): An Integrated Approach" FAO – Elsevier. Section 41.3 on pages 458-463 in <https://www.sciencedirect.com/book/9780128121344/sustainable-food-and-agriculture>

54-55. 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.

55-56. 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, **support to develop monitoring frameworks**, 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.

56-57. 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 **develop monitoring frameworks**, examine the evidence, prioritize issues to be considered, evaluate impacts, and address potential trade-offs.

57-58. 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

58-59. 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.

59-60. 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 2012⁵⁶ **and its diet related NCD targets**⁵⁷. The VGFSyN should support countries in defining priority actions and formulating

Commented [A205]: Inserted because there is precious little mention anywhere in the document of indicators and monitoring.

Commented [A206]: Universities may also provide support with monitoring and definition of indicators.

⁵⁶ <https://www.who.int/nutrition/global-target-2025/en/>

⁵⁷ <https://www.who.int/beat-ncds/take-action/targets/en/>

“SMART” commitments⁵⁸ 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.

~~60-61~~ 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. CFS member should report every two year how the VGFSyN is being implemented in their countries at a special side event that would showcase a few countries for lessons learning.

Commented [A207]: I find that in their current form, i.e. a long list of proposed actions with no sense of prioritization among those based on need or contexts, the guidelines cannot be easily used for defining priority actions.

Commented [A208]: It's not clear **how** the CFS is to use the VGFSyN in its monitoring work. And, will it come up with an indicator framework for this purpose?

Commented [A209]: A platform could be extremely useful too, for better identification of good practices by region.

⁵⁸ 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-of-action/smart_commitments/en/