

New Zealand comments on CFS Voluntary Guidelines on Food Systems for Nutrition (VGFsYN) – Draft for Negotiations

We would like to make the following overarching comments. These are points that New Zealand raised in the last submission of written comments in February 2020, and that we would like to take this opportunity to reiterate and elaborate on further.

New Zealand supports the Committee on World Food Security's (CFS) vision to work in a coordinated way to ensure food and nutrition security for all. New Zealand is committed to optimising its role in the global food system, through contributing to nutrition security and wellbeing outcomes, and advancing the UN sustainable development agenda. There are three key issues that in New Zealand's view will need to be addressed if the guidelines are to be effective and have tangible impact.

1. Recognising the challenge of achieving nutritional and other goals in the face of competing food systems objectives

Currently the draft guidelines contain a large number of normative statements about what governments and other actors should do in order to improve nutritional outcomes and other food systems objectives. However there is little recognition of the fact that in reality governments and other food systems actors need to navigate and prioritise between competing objectives, and that to do this requires understanding where key tensions and barriers exist. This requires an assessment of interaction effects, in which trade-offs and synergies are identified so that it becomes possible to find ways to mediate between conflicting objectives. Ensuring the guidelines' recommendations are feasible and implementable also requires demonstrating a clear understanding of (often complex) cause and effect relationships, as well as identifying plausible pathways so that actions that are likely to have the greatest impact are emphasised. Highlighting areas of uncertainty and being transparent about the robustness of the evidence base upon which the guidelines are based is essential to ensuring CFS recommendations are credible and useful.

2. Ensuring the guidelines are implementable and add value

The guidelines are intended to support governments to implement the UN Decade of Action on Nutrition. We are almost half way through this action phase with significant challenges still to be overcome. As the draft guidelines note, there are already a large number of guidance documents and action plans developed to tackle the global challenges around food security and nutrition. It is widely recognised that what is needed, now more than ever, is concerted efforts to help countries at the national level to implement coherent national policies that clearly recognise and support actions from all players (governments, industry, consumers and civil society). We note that, in our region of the world, the Pacific, many countries are still struggling with challenges in this respect. We encourage the CFS to be very clear about what value is it adding and how these guidelines are going to help achieve tangible results at the national level.

3. Acknowledging the role of trade in global food security and nutrition

We wish to draw attention to the fact that many international organisations, including the FAO and WHO, have recently released statements highlighting the importance of trade for achieving food security, including access to adequate, safe, affordable and nutritious food. Trade is both an

important source of food for countries through imports, as well as a financial resource through food that is exported. We also note the release of [a recent international study examining the global drivers of food system \(un\)sustainability](#). One of the study's key findings is that international trade appears to be positively correlated with the sustainability of the global food system. The very strong domestic self-sufficiency approach in the draft guidelines ignores the reality that for most countries national food security relies heavily on food imports and being able to sell nationally produced foods to other countries. The lack of acknowledgement of the benefits of trade in the draft guidelines appears at odds with the global recognition of the important role trade plays in achieving food and nutrition security.