



# CFS Voluntary Guidelines on Food Systems for Nutrition (VGFSyN)

## Draft for Negotiations

### Contents

<b>PART 1 - INTRODUCTION</b> .....	2
<b>1.1 BACKGROUND AND RATIONALE</b> .....	2
<b>1.2 KEY CONCEPTS</b> .....	<del>7</del> <sup>6</sup>
<b>PART 2 – OBJECTIVES AND GUIDING PRINCIPLES</b> .....	7
<b>2.1 OBJECTIVES AND PURPOSE</b> .....	7
<b>2.2 NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS</b> .....	8
<b>2.3 GUIDING PRINCIPLES FOR TRANSFORMING FOOD SYSTEMS OR PROMOTING SUSTAINABLE FOOD SYSTEMS</b> .....	9
<b>PART 3 - THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION</b> .....	10
<b>3.1 TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS</b> .....	12
3.1.1 Promoting policy coherence by integrating nutrition into national development.....	12
3.1.2 Strengthening multisectoral coordination and actions.....	<del>13</del> <sup>12</sup>
3.1.3 Creating accountability mechanisms, monitoring and evaluation.....	13
<b>3.2 SUSTAINABLE FOOD SUPPLIES FOR IMPROVED DIETS AND NUTRITION IN THE CONTEXT OF CLIMATE CHANGE</b> .....	14
3.2.1 Prioritizing climate adaptation and mitigation across food supplies.....	14
3.2.2 Ensuring sustainable use and management of natural resources in food production.....	15
3.2.3 Promoting nutrition within agriculture and food production.....	<del>16</del> <sup>15</sup>
3.2.4 Improving food storage, processing, transformation and reformulation.....	<del>17</del> <sup>16</sup>
3.2.5 Improving nutrition and health of farm and food system workers.....	17
3.2.6 Empowering youth across food systems.....	<del>18</del> <sup>17</sup>
<b>3.3 EQUITABLE ACCESS TO HEALTHY DIETS DELIVERED BY SUSTAINABLE FOOD SYSTEMS</b> .....	<del>18</del> <sup>17</sup>
3.3.1 Improving access to food that contributes to healthy diets.....	<del>19</del> <sup>18</sup>
3.3.2 Improving the availability and affordability of food that contributes to healthy diets.....	<del>19</del> <sup>18</sup>
3.3.3 Monitoring new technologies and promoting trends for healthy diets.....	<del>20</del> <sup>19</sup>
<b>3.4 FOOD SAFETY ACROSS SUSTAINABLE FOOD SYSTEMS</b> .....	<del>20</del> <sup>19</sup>
3.4.1 Adopting national and international cooperation on food safety.....	20
3.4.2 Ensuring food safety across food production systems.....	<del>21</del> <sup>20</sup>
3.4.3 Protecting consumers from food safety risks in food supplies.....	<del>21</del> <sup>20</sup>
<b>3.5 SOCIAL RELATIONS, KNOWLEDGE AND CULTURE OF DIETS</b> .....	21
3.5.1 Utilizing policies and tools to provide education and information on healthy diets.....	<del>22</del> <sup>21</sup>
3.5.2 Encouraging local food knowledge and culture.....	<del>23</del> <sup>22</sup>

**Commented [RN1]:** In response to input from CFS stakeholders on COVID, an option may be to revise order of document so that Section 3.7 (Resilient Food Systems in Humanitarian Crisis) is brought to the forefront and serves as a framing mechanism, in light of Covid-19 and the potential for a hunger pandemic (per WFP).

3.5.3 Promoting “hubs” for nutrition knowledge, education and information.....	<del>2322</del>
<b>3.6 GENDER EQUALITY AND WOMEN’S EMPOWERMENT ACROSS FOOD SYSTEMS .....</b>	<del>2423</del>
3.6.1 Empowering women .....	<del>2423</del>
3.6.2 Promoting and acknowledging women as food system entrepreneurs.....	<del>2423</del>
3.6.3 Recognizing women’s nutritional status and deprivation .....	<del>2524</del>
<b>3.7 RESILIENT FOOD SYSTEMS IN HUMANITARIAN CONTEXTS .....</b>	<del>2524</del>
3.7.1 Protecting the most vulnerable to malnutrition in humanitarian contexts .....	<del>2625</del>
3.7.2 Improving the quality of food and nutrition assistance.....	<del>2625</del>
3.7.3 Ensuring food systems are resilient in humanitarian contexts.....	<del>2726</del>
<b>PART 4 - IMPLEMENTATION AND MONITORING OF THE USE AND APPLICATION OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION .....</b>	<del>2726</del>
<b>4.1 POLICY FORMULATION AND IMPLEMENTATION OF THE VGFSyN .....</b>	<del>2726</del>
<b>4.2 BUILDING AND STRENGTHENING CAPACITY FOR IMPLEMENTATION .....</b>	<del>2827</del>
<b>4.3 MONITORING OF THE USE AND APPLICATION OF THE VGFSyN .....</b>	<del>2928</del>

## PART 1 - INTRODUCTION

### 1.1 BACKGROUND AND RATIONALE

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

2. Malnutrition in all its forms is associated with various forms of ill health and increased mortality. **Undernutrition** is a major cause of death among children under the age of five years, increases the susceptibility to infectious diseases and risk of non-communicable diseases (NCDs) in adulthood. Wasting, also known as acute malnutrition, poses a significant risk of increased morbidity and mortality in children. Stunting, also known as chronic malnutrition, is associated with delays in both physical growth and cognitive development.

3. **Micronutrient deficiencies** related to the inadequate intake of food rich in iron, vitamin A, iodine, folate, vitamin D, and zinc, among others, affect a large proportion of the global population with

<sup>1</sup> “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 [RN2]:** Food security/insecurity as key concept for the framing of the guidelines in light of Covid-19.

serious consequences on health, well-being, and development. Children under the age of five years, adolescent girls, women of childbearing age, and pregnant and lactating women have specific nutritional requirements across their lifecycle and are susceptible to a higher risk of anaemia, in particular iron deficiency anaemia. Also referred to as “hidden hunger,” micronutrient deficiencies increase a person’s vulnerability to infection, birth defects, impaired development, and lower life expectancy.

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

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

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

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

8. **Those most affected by malnutrition in all its forms** typically include people with increased nutrient requirements and those who have less control over their dietary choices, including young and school-aged children, adolescents, pregnant and lactating women, the elderly, and people with disabilities. In addition, Indigenous Peoples, peasants, urban and rural poor, agriculture workers, upland

and remote communities, migrants, refugees and displaced people are particularly vulnerable to malnutrition because of their persistent or temporary poverty.

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

10. **Climate change, agriculture<sup>3</sup>, and nutrition are interconnected.** Climate change affects temperature and precipitation, as well as the frequency and severity of extreme weather events. Increases in temperature, heat waves, and droughts impact agriculture, with the largest effects being decreased crop yields and livestock productivity, as well as declines in fisheries and agroforestry in areas already vulnerable to food insecurity. Climate change also impacts food quantity, quality, safety and ultimately food prices, with significant implications for the availability of healthy diets. At the same time, agriculture and food production are major contributors to greenhouse gas emissions and account for large portions of the planet's land and fresh-water use.

11. **Unhealthy diets, in conjunction with other risk factors** have become a major risk factor of multiple forms of malnutrition and health outcomes globally. Global dietary patterns have been changing, affecting people across all parts of the world. In many regions of the world, dietary changes are shifting towards the consumption of convenient food and beverages with high content in calories, sugars and/or saturated fat, salt, low in fibre which are associated with an increased prevalence of overweight, obesity and NCDs, as well as low consumption of vegetables, fruits and whole grains. 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. **Food systems<sup>4</sup>** are complex webs of activities and actors involving the production, processing, handling, preparation, storage, distribution, consumption and ultimately waste of food. They are constantly being shaped by different forces, drivers and decisions by many different individuals. It is essential to transform Every food systems to have has the capacity to be equitable and to assure its population access to adequate amounts of safe, quality foods that deliver to produce healthy diets needed for optimal nutrition for healthy diets. Systems that do not meet the needs of its population due to But, they can also be shaped by power concentration and imbalances and other factors should be transformed appropriately to serve those needs and made, which may not be inclusive, and equitable

<sup>2</sup> 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

<sup>3</sup> Agriculture includes crops, forestry, fisheries, livestock and aquaculture. [UNGA Resolution A/RES/74/242](#). Paragraph 20

<sup>4</sup> "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". HLPF. 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.

**Commented [RN3]:** In light of Covid-19, suggest expanding to include reference to pandemics. Again, perhaps bringing this concept more to the forefront – we are at risk of a "hunger pandemic" (See WFP Global Food Crisis Report 2020) as a result of Covid-19. See recommendation to move Section 3.7 (Resilience of Food Systems in Humanitarian Crisis) to forefront.

**Commented [A4]:** For purposes of accuracy and in order to prevent 'silo'ing' of interventions the text should reflect that there are additional risk factors that contribute to overweight/obesity, which is multifactorial issue (including factors such as genetics, environment, physical inactivity). For references see WHO Report of the Commission on Ending Childhood Obesity as well as WHO's Global Strategy on Diet, Physical Activity, and Health, both of which recognize the complex nature of obesity as well as the number of risk factors.

**Commented [RN5]:** No scientific evidence is offered to substantiate this claim, nor are we aware of any internationally agreed definition of "convenient food and beverages"

**Commented [AS6]:** As well as low consumption of vegetables and whole grains ref 2016, 2017, 2018 Global Burden of Diseases Report

**Commented [AS7]:** See the Global Burden of Diseases Report of 2016, 2017, and 2018.

**Commented [RN8]:** PSM requests the change due to the implication that "trade" is negative, when now more than ever, trade is essential to maintaining a strong food supply chain and maintaining food security.

PSM renews its previous calls to include additional references to the positive contribution trade can have throughout the document. Implicit and explicit suggestions throughout the text that trade undermines health and nutrition have been rejected in other UN for and could be counterproductive.

**Commented [RN9]:** Consider reviewing this definition in light of Covid-19 and its impact on food system if mention of food security is not included in paragraph 13 below.

**and resilient.** 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 degradation, water pollution, and loss of biodiversity as well as to excessive food consumption and food waste patterns.

13. The **functionality of food systems** and their ability to deliver healthy diets is influenced by a number of **internal and external** drivers which indicate that, in order to **ensure food security and improve nutrition, and enhance the safety and quality of foods**, context specific changes are needed not only in agriculture and food policies, but also across multiple sectors and policy areas that address, for example, national development priorities, economic policies, and social norms<sup>5</sup>.

14. Transforming food systems and promoting sustainable food systems<sup>6</sup> that meet the dietary needs of populations require **institutional and behavioural changes** among all food system actors. Food system-related policies need to focus on their economic, social, environmental, cultural, nutritional, and health consequences, paying special attention to the poorest and most vulnerable to malnutrition and addressing barriers they face in accessing food for healthy diets.

15. **Changes in governance** are needed within and across food systems, and its constituent elements, namely food supply chains<sup>7</sup>, food environments<sup>8</sup>, consumer behaviour<sup>9</sup> to generate positive outcomes along the three dimensions of sustainability – social, economic, and environmental.

16. **Coordination processes** are required to **address policy fragmentation** across sectors such as health, agriculture, education, environment, water, sanitation, gender, social protection, trade, employment, and finance – all of which impact nutrition outcomes. **Addressing specific components of food systems through targeted guidance: for example, developing guidance in the context of Frameworks for Managing Food Safety Challenges through Enhanced Process and Procedures, are essential to showcase for national governments and their decision makers how to assess, define and implement specific areas of food system transformations, such as food safety that cuts across and must be coordinated across all aspects from pre-production to consumption.**

17. The Committee on World Food Security (CFS) has undertaken a policy process to produce **Voluntary Guidelines on Food Systems for Nutrition (VGFSyN)**. The preparation of the VGFSyN is informed by the findings and scientific evidence provided in the [High Level Panel of Experts on Food Security and Nutrition's \(HLPE\)<sup>10</sup> Report on Nutrition and Food Systems](#), additional literature as well as a

<sup>5</sup> 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.

<sup>6</sup> "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

<sup>7</sup> 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

<sup>8</sup> 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

<sup>9</sup> 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

<sup>10</sup> 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.

consultation process that took place between May and November 2019 which involved the participation of CFS stakeholders in meetings in Italy, Ethiopia, Thailand, Hungary, Egypt, Panama, and the United States of America, as well as through an electronic consultation.

18. This policy process is taking place at the same time as a variety of organizations from different sectors are addressing malnutrition. Food systems and nutrition have received **increased attention from the global community**, including the United Nations (UN) and its Member States, and are recognized as essential co-determinants for achieving the goals of the 2030 Agenda for Sustainable Development. In 2014, at the Second International Conference on Nutrition (ICN2), members of the Food and Agriculture Organization (FAO) and the World Health Organization (WHO) committed to ending hunger and malnutrition in all its forms<sup>11</sup>. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025)<sup>12</sup> 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)<sup>13</sup>. Specific attention to nutrition has been given by a number of UNGA Resolutions especially the 2018 UN Political Declaration on NCDs and the 2018 UN Global Health and Foreign Policy Resolution<sup>14</sup>, the UN Economic and Social Council (ECOSOC)<sup>15</sup>, the UN Environment Assembly<sup>16</sup>, the World Health Assembly (WHA)<sup>17</sup> and the UN Special Rapporteur on the Right to Food<sup>18</sup>.

**Commented [RN10]:** Recommend directly referencing the 2018 UN Political Declaration on NCDs and GHFP Resolutions in the text as they are the most recent and comprehensive resolutions on global nutrition.

19. The VGFSyN are expected to contribute to and complement these international initiatives with a view to **promoting policy coherence**. They provide science and evidence-based guidance to help countries operationalize ICN2's Framework for Action<sup>19</sup> 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) 2<sup>20</sup>, with particular attention to targets 2.1<sup>21</sup>, 2.2<sup>22</sup> and 2.4<sup>23</sup>. 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).

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

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

<sup>13</sup> [UNGA Resolution A/RES/72/239](#).

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

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

<sup>16</sup> [Ministerial Declaration of the 2019 United Nations Environment Assembly](#)

<sup>17</sup> 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.

<sup>18</sup> [A/71/282 "Interim report of the Special Rapporteur on the right to food"](#)

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

<sup>20</sup> SDG 2, "End hunger, achieve food security and improved nutrition and promote sustainable agriculture".

<sup>21</sup> 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".

<sup>22</sup> 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".

## 1.2 KEY CONCEPTS

20. **Healthy diets** are those diets that are of adequate quantity and quality to achieve optimal growth and development of all individuals and support functioning and physical, mental and social wellbeing at all life stages. They help to protect against malnutrition in all its forms, including undernutrition, micronutrient deficiency, overweight and obesity) as well as NCDs, such as diabetes, heart disease, stroke and cancer. The exact make-up of healthy diets varies depending on individual characteristics (e.g. age, gender, lifestyle and degree of physical activity), cultural context, local availability of foods and dietary customs. They are diversified, balanced, and safe and should limit the intake of saturated and ~~industrially-produced~~ 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 benefits<sup>24</sup>.

**Commented [RN11]:** We would suggest changing “trans fat” to “industrially-produced trans fat” throughout the document to distinguish it from naturally occurring trans fat and to ensure policy coherence with the WHO recommendations for the elimination of industrially-produced trans fat by 2023

21. **Sustainable healthy diets** are healthy diets that combine all the dimensions of sustainability to avoid unintended consequences and undermine healthy diets of future generations. They contribute to the preservation of biodiversity and have a low environmental pressure and impact<sup>25</sup>.

22. **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 ~~industrially-produced~~ trans fats.

**Commented [AS12]:** For consistency, PSM suggests sticking to salt or sodium throughout document.

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

**Commented [AS13]:** It is unclear what is meant by “adequate food”, as a result, PSM suggests its change to “adequate diets.” throughout the document.

## PART 2 – OBJECTIVES AND GUIDING PRINCIPLES

### 2.1 OBJECTIVES AND PURPOSE

24. The **objective of the VGFSyN** is to contribute to transforming food systems<sup>27</sup> and promoting sustainable food systems to ensure that the food that contributes to sustainable healthy diets is available, affordable, accessible, safe, and of adequate quantity and quality while conforming “with

<sup>23</sup> 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”.

<sup>24</sup> Adapted from WHO healthy diet: [www.who.int/news-room/fact-sheets/detail/healthy-diet](http://www.who.int/news-room/fact-sheets/detail/healthy-diet)

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

<sup>26</sup> 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).

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

beliefs, culture and traditions, dietary habits, and preferences of individuals, in accordance with national and international laws and obligations<sup>28</sup>.

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

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

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

## 2.2 NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS

28. The VGFSyN are non-binding and should be **interpreted and applied consistently with existing obligations** under relevant national and international law, including the [Universal Declaration of Human Rights \(1948\)](#) and other agreed international human rights instruments, and with due regard to voluntary commitments under applicable international and regional instruments. CFS guidance should build upon and integrate existing instruments and frameworks for action adopted in the context of the UN system, guidance, and recommendations endorsed by Member States.

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

- [Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of the national food security](#) (2004),
- [CFS Voluntary Guidelines on the responsible governance of tenure of land, fisheries and forests in the context of national food security – VGGT](#) (2012),

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

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

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

- a) Governmental actors, including relevant ministries and national, sub-national, and local institutions, and parliamentarians;
- b) Intergovernmental and regional organizations, including specialized UN agencies;
- c) Civil society and non-governmental organizations, including those representing Indigenous Peoples, vulnerable groups and communities, and smallholders, fisherfolks, pastoralists, landless and workers;
- d) **Large to small** farmer organizations and their networks;
- e) Private sector actors, including agribusiness, **input providers, traders, primary food processors**, 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 industry<sup>30</sup>;
- f) Research organizations, academic institutions, and universities;
- g) Development partners, including international financial institutions;
- h) Private donors, foundations, and funds;
- i) Consumer associations;
- ii) **Multi-sector and multi-stakeholder forums**.

**Commented [AS14]:** Should add input providers, traders, primary food processors

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

31. The VGFSyN include **five guiding principles**<sup>31</sup> 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.

**Commented [RN15]:** Appreciate the inclusion of the role of various private sector actors, including agribusiness, manufacturers, retailers, etc, but believe the value of coordination and collaboration among sectors, including the government, the private-sector mechanism (PSM) and the civil society mechanism (CSM) across the food system also needs acknowledgement.

<sup>30</sup> 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.

<sup>31</sup> 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.

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

- a) **Systemic, multisectoral, science- and evidence-based approach.** Promote a systemic, multisectoral, and science and evidence-based approach that considers food systems in their totality, integrates indigenous and traditional forms of knowledge, seeks to simultaneously maximize outcomes across all sustainability dimensions, 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 among different actors and across all relevant sectors at international, regional, national, subnational, and local levels.
- c) **Accountability, transparency and participation.** Support efforts in strengthening governance and accountability mechanisms that contribute to fostering **citizen-stakeholder participation** in national debates on food security and nutrition and on food systems, and transparent and inclusive decision-making processes, based on transparent rules of engagement including safeguards against potential conflicts of interest.
- d) **Healthy people, healthy planet, healthy communities.** Promote policies and actions that enhance the livelihoods, health, and well-being of the population, as well as sustainable food production and consumption to protect natural resources, ecosystems and biodiversity, and ensure mitigation of and adaptation to climate change.
- e) **Gender equality and women’s empowerment.** Promote gender equality and women’s and girls’ empowerment, and respect, protect and fulfill their rights, creating the conditions for women’s involvement in decision-making and strong engagement in shaping food systems that improve nutrition, recognizing their key role in care, education, agriculture, health promotion and food preparation and consumption, while promoting gender-equitable practices.

**Commented [RN16]:** We believe the addition of transparency and participation are extremely positive, but note with some concern that the intent seems to only focus on fostering “citizen” participation in national debates. We see no benefit to limiting participation only to citizens and suggest the substitution of the term throughout the document to stakeholders.”

**Commented [RN17]:** We encourage revision to include **healthy communities.** This is consistent with the holistic approach recommended by the HLPE, which advocates consideration of environment(planet), economic(people/livelihoods) and social (communities) dynamics of the system.

## PART 3 - THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION

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

**Commented [RN18]:** Recommend reframing to focus on post-pandemic realities – importance of lowering barriers to food supply to ensure food security, efforts that can be made to avoid a hunger crisis.

34. To achieve the WHA and 2030 Agenda targets and national commitments to end malnutrition in all its forms, **a food system approach is needed** that recognizes that the various parts that make up food systems are interconnected; that any action or decision to address one aspect of a food system will

**Commented [RN19]:** Given the global implications of Covid-19, it is essential that now more than ever, we consider each policy recommendation with the utmost care – is it grounded in strong science? Does it promote positive health outcomes? We need to thoroughly consider trade-offs in a time of very fragile food security – what are the economic impacts of these policies? Do they raise costs or have the potential to create job loss? Recommend raising specific point of trade-offs in Section 3.7

likely impact other aspects, and that food systems respond and are impacted by other systems, situations, and contexts. Thinking systematically and interdisciplinary 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.

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

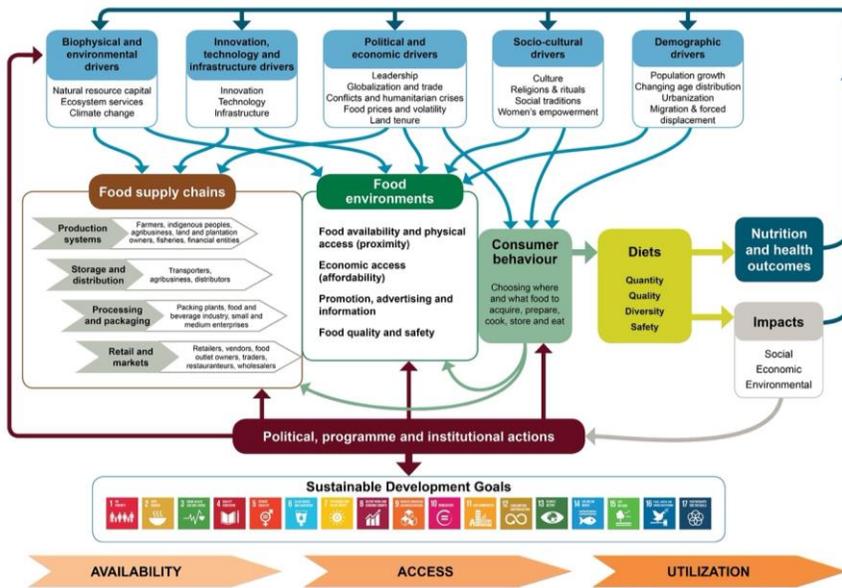
36. The HLPE report was structured around three main constituent elements of food systems<sup>32</sup> and proposed a wide number of policy areas and drivers of change (See **Figure 1**). During the consultation process, CFS stakeholders identified a number of cross-cutting factors that are relevant 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 interwoven<sup>33</sup> across the six other areas. Three areas cover the main components of food systems while an additional area is based on the recognition of the increased importance of collective action in addressing food safety. Special attention is focused on women because of the vital role they play in food systems. The humanitarian context serves as a standalone area because it will continue to be a significant global issue in the context of climate change, protracted crises, conflict and migration.

**Figure 1: HLPE Food Systems Framework**<sup>33</sup>

**Commented [RN20]:** This HLPE framework does not capture the fact that food safety is an essential element that cuts across sustainable food systems, consistent with item (iv) in paragraph 35. The framework should be adjusted to appropriately infuse food safety across every element of the HLPE Food Systems Framework in the "food supply chains" segment.

<sup>32</sup> Food supply chains, food environments and consumer behaviours

<sup>33</sup> HLPE 2017b



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

### 3.1 TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS

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

#### 3.1.1 Promoting policy coherence by integrating nutrition into national development

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

**Commented [RN21]:** Consider giving food security – in the Covid context – a specific mention under this section (the need to ensure there are no barriers to the continued operation of food supply chains etc).

- b) Governmental actors should **integrate sustainable food system actions** that promote healthy diets and nutrition into national and local development, health, economic, agricultural, climate/environment, and disaster risk reduction plans. This integration should be complemented with **increased and improved budgetary allocations** to food system activities with clear objectives of improving diets and nutrition with indicators to track and assess the full cost accounting of addressing malnutrition in all its forms.
- c) Governmental actors should **implement science-based policies ensure that international and bilateral trade and investment agreements are** consistent **international obligations and 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 [RN22]:** PSM is pleased to see refs to Codex, OIE, however we note it is beyond the mandate of CFS to decide or dictate the objectives of bilateral and multilateral trade agreements, hence the suggested revision.

**Commented [RN23]:** Strongly support reference to alignment with Codex Alimentarius Commission standards. Perhaps in light of food supply challenges associated with Covid-19, highlight importance of ensuring no unnecessary barriers to access.

### 3.1.2 Strengthening multisectoral 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** 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.
- c) Governmental actors, intergovernmental organizations, and civil society organizations should **encourage increased commitment to action with responsible investment**<sup>34</sup> 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.

### 3.1.3 Creating accountability mechanisms, monitoring and evaluation

- a) Governmental actors should establish or strengthen **science and evidence-based 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,

**Commented [AS24]:** In keeping with CFS's objective to have a set of guidelines that are science- and 3. (para 25 and 32.a), to further strengthen this guidance, PSM would suggest the addition of "science and evidence-based" in several instances in the document.

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

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 ~~all stakeholders is 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, diets (particularly dietary intake and dietary quality), food composition, and nutrition (including the measurement of micronutrients and anthropometry) for improved policy development and accountability, and better targeting of public programmes.
- c) Governmental actors, with the support of intergovernmental organizations, should **promote investment in human, system, and institutional capacity** to analyze food system information in a comprehensive manner to support the planning, monitoring, and evaluation of programmatic actions.

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

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

#### 3.2.1 Prioritizing climate adaptation and mitigation across food supplies

- a) Governmental actors (including national extension systems), development partners, NGOs, and private sector actors should **assist** farmers and other food producers to adapt to, and ensure food supply chains are resilient to, climatic shocks by managing risk and building preparedness and resilience. Assistance can include access to finance, insurance, forecasting data and methods, and immediate help through service apps (e.g. to identify plant diseases and parasites). Assistance could also include protecting crops, livestock, and fisheries and overall production systems from the anticipated impacts of climate change in the form of pests, diseases, weather-related shocks, and adopting drought resistant varieties, as well as productive-asset creation initiatives (e.g. rehabilitating degraded land and infrastructure development).
- b) Governmental actors, intergovernmental organizations, NGOs, and private sector actors should support and assist farmers and other food producers to **reduce the environmental impact** of food systems. This could be done by fostering the adoption of appropriate technology and on-farm management practices to improve crop yields and reduce pesticide usage. Governmental actors should promote optimization of agricultural outputs per unit of water, energy, and land,

and reduce greenhouse gas emissions, biodiversity loss, and natural resource degradation of agriculture activities.

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

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

- a) Governmental actors and farmers and their organizations should **address soil health** as central to agricultural production systems. Governmental actors should encourage the use of integrated soil fertility management practices to maintain and increase crop productivity in a sustainable way, and provide appropriate incentives for the use of sustainable land management services and agricultural practices to maintain soil biodiversity and nutrient balance and promote carbon storage. Scientific evidence also demonstrates that well adapted plant nutrient management can increase the health-promoting components of plant-based food and feed.
- b) Governmental actors should **improve the management and control of water resources** for agriculture and food production through improved regulation, community participatory approaches, and water stewardship approaches that involve civil society organizations, private sector actors, and other stakeholders.
- c) Governmental actors should **foster the protection, conservation, and sustainable use of biodiverse, productive systems** that include diverse crops and livestock, neglected and underutilized species, forestry and plantations, fisheries and sustainable aquaculture as well as biodiverse landscapes including forests, water and coastal seas. This should be complemented through the adoption and application of sustainable food production and natural resource management practices including agroecological and other innovative approaches<sup>35</sup> in a manner that is economically viable for all legitimate tenure rights holders to uphold those rights and maintain livelihoods.
- d) Governmental actors should **protect the rights of Indigenous Peoples, small-scale producers, peasants, and other communities** with customary tenure systems that exercise self-governance of land, fisheries and forests, to land, territories, and resources they have traditionally owned, occupied or otherwise used or acquired. Without limiting their access to formal value chains and training, ~~their~~<sup>Their</sup> livelihoods should be maintained, their traditional, collective knowledge and

**Commented [RN25]:** As plants are among the primary source of nutrients for humans and animals, **there is a direct and indirect link between mineral macro-and micronutrient application to plants and animal and human nutrition:** Human nutrition is not only dependent on crop production, but also on the nutrient density and quality of the plants consumed directly (or indirectly through animals).

**Commented [RN26]:** There is an understanding that the focus on agroecology and appreciates the value of agroecological approaches to the sustainability of farming. However, we would like to emphasize the value of multiple approaches to the sustainability of food and farming. The rich diversity of farming approaches or systems in farming is important for sustainability.

**Commented [RN27]:** Traditional practices are not always the best, for all contexts. It is important that small producers are NOT isolated from formal value chains, just because their practices are traditional.

<sup>35</sup> 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.

practices should be valued, their access to traditional food should be protected, and their diets, nutrition, and wellbeing should be prioritized.

### 3.2.3 Promoting nutrition within agriculture and food production

- a) Governmental actors should **integrate nutrition objectives into their national agriculture policies**.
- b) Governmental actors, private sector actors, development partners and donors should diversify agricultural investment and incentivize all types and sizes of producers to **adopt sustainable production practices and to produce diverse, nutritious crops and food** that contribute to healthy diets, while ensuring a decent income, livelihoods and resilience for farmers, particularly smallholders and/or family farms, and farm workers. This should include supporting and encouraging sustainable livestock, agroforestry, animal and fishery systems (including artisanal fisheries and aquaculture).
- c) Governmental actors should **integrate urban and peri-urban agriculture** and urban land use into national and local agricultural development strategies, food and nutrition programmes, and 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 and foods, including animal sourced foods for markets.
- e) To reduce excessive food price volatility, governmental actors should **promote market information systems** that provide timely, transparent information about food-related market transactions, with more emphasis on nutritious commodities and orphan crops, including enhanced tracking of current and future food supply stock and price data.
- f) Governmental actors, private sector actors, donors and other relevant stakeholders should **invest in research, development, and innovation** for producing nutritious crops, such as fruit, vegetables, nuts and seeds, legumes, biofortified crops (~~developed through conventional on-farm breeding~~), and diverse animal-source food and breeding (e.g. dairy products, fish, eggs, and meat), which are developed keeping smallholder and/or family farmers' livelihoods in mind.
- g) Governmental actors should support value chain development that links smallholder farmers, and the informal food production sector, directly to the formal local, regional and international food processing and packaging sector thus providing smallholder farmers' increased income, improving the accessibility of local & traditional food supply whilst improving and safeguarding food safety, sustainability and nutritional value of foods.

[#h\)](#)

**Commented [RN28]:** We support the recommendation to create enabling environments for modern and sustainable technologies that could improve the production, safety and nutritional quality of crops. However, we see no reason to limit this section just to crop production, hence the addition.

**Commented [RN29]:** PSM supports the continued investment cited in this section, but suggest deleting conventional breeding, since this could be inferred to limit technological advancement and innovation.

### 3.2.4 Improving food storage, processing, transformation and reformulation

- a) Governmental actors, private sector actors, and donors should **invest in infrastructure** (e.g. storage facilities, roads and bridges, physical markets, market information systems) to prevent postharvest loss and ensure smallholder farmers and small and medium-size enterprises (SMEs) are able to deliver diverse, perishable, safe food to markets in sustainable ways.
- b) **Governmental actors, private sector actors, and farmers and their associations should facilitate minimizing food and nutrient loss** on farms, during post-harvest storage, and throughout processing, transportation, and retail (particularly perishable foods such as fruits, vegetables, dairy, eggs, fish and meat). Facilitation includes training and capacity on improved management practices and fostering the adoption of appropriate technologies<sup>36</sup>.
- c) Governmental actors **in collaboration with private sector actors** should **establish guidance on the use of processing and packaging technologies**<sup>37</sup> 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. **Governmental actors should also facilitate private sector investments in processing and packaging technologies.**
- d) Governmental actors should **promote science and evidence-based regulatory instruments, and incentives, including encouraging innovation, and government-led voluntary industry initiatives** to promote reformulation **and other product improvements—when necessary and useful**, complemented with appropriate measures such as front-of-pack labels (FOPL) **and small and reduced portion sizes and taxes** to minimize the promotion of foods high in energy density with minimal nutritional value, (such as foods high in sodium, sugar, and **industrially-produced** trans and/or saturated fats), in accordance with World Trade Organization (WTO) rules **and Codex Alimentarius standards. Any FOPL system should be easy-to-understand, objective, fact- and science-based.**
- e) Private sector actors should strive to **meet public health goals aligned with science and evidence-based national food-based dietary guidelines** by further producing and promoting nutritious foods and food products that contribute to a healthy **and diet balanced diet**, such as increasing and preserving nutrient content and making efforts to **reformulate foods**, when necessary, by **adding healthy ingredients such as whole grains and/or by reducing the excessive content of sodium, sugar, and saturated fats, calories and eliminating industrially-produced trans fats** in foods.

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

- a) Governmental actors should **ensure that the right to decent work** is respected, protected and fulfilled for farmers and other food producers and workers (including migrants and

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

<sup>37</sup> Technologies include flash and solar drying, converting food to pastes and spreads, appropriate **processing and packaging** to preserve nutrient content, **and extend shelf-life** 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 [AS30]:** Recommend adding “and other relevant stakeholder” here as well. Also NGO or civil society organisations can support the investment in infrastructure to prevent post-harvest losses and facilitate the minimizing of food and nutrition loss (e.g. via training and capacity building). We would also like to emphasize that post-harvest losses can already be prevented by using the right input (e.g. seeds adapted to the local environmental conditions) or by using new varieties that provide a better storage stability behaviour (e.g. tomatoes with thicker cuticles that can be transported without packaging and minimum loss during transportation, even over long distances under ambient temperature).

**Commented [RN31]:** Government actors alone do not possess the expertise to advice and guide on the use of processing technologies. Processing technologies are not enough to preserve food and must be combined with packaging technologies. Private sector investments are also needed but should be facilitated and incentivized by governmental actors. Without the mentioning of investments, the important role of industry is almost

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**Commented [AS32]:** Should include further explanation needed what are incentives to promote reformulation. He

**Commented [RN33]:** The food industry has a proven track-record of delivering concrete and meaningful results on product formulation and innovation (including portion sizes) through voluntary actions.

**Commented [A34]:** When it comes to use of fiscal and some regulatory measures, we would like to see recognition for the significant and successful contributions the food a

**Commented [RN35]:** There are other ways besides reformulation to improve food quality/nutrition. Traditional breeding, as one example. Consider adding the words “an

**Commented [RN36]:** We suggest the deletion of the references to “taxes.” While PSM does not oppose fiscal measures per se, it is a question of what type of regulatio

**Commented [RN37]:** PSM notes the need to align to WHO wording and refer to industrially-produced trans-fat.

**Commented [A38]:** We welcome the specific guidance on FOPL. FOPL is a valuable and complementary public health tool with the potential to encourage behavior change by

**Commented [AS39]:** Reformulation is not the only tool. Suggest mentioning innovation, portion sizes and consumer awareness.

**Commented [AS40]:** “Salt/sodium” are not used consistently throughout the document.

**Commented [AS41]:** Should read “industrially-produced trans-fats” for the reasons stated previously. No examples given of promoting only of producing

undocumented workers), that these populations are protected and safe, and that there is no unnecessary burden or undue labour (including child slavery) which could negatively impact their health status.

- b) Governmental actors and private sector actors should **provide social protection** when necessary to food producers and workers to ensure they are food secure, have living wages and sufficient livelihoods, and can access healthy diets and adequate health services.
- c) Private sector actors should strive to **improve the nutritional status of workers**, increase their access to nutritious foods associated with healthy diets in or through the workplace, and encourage the establishment of facilities for breastfeeding.

### 3.2.6 Empowering youth across food systems

- a) Governmental actors, intergovernmental organizations, and private sector actors should engage and empower youth by **removing obstacles and enhancing their access** to land, natural resources, inputs, tools, information, extension and advisory services, financial services, education, training, markets, and inclusion in decision-making processes in accordance with national legislation and regulations.
- b) Governmental actors, private sector actors, non-governmental organizations, and communities should **invest in appropriate vocational training, education, and mentorship programmes** for youth to increase their capacity and access to decent work and entrepreneurship opportunities to stimulate the transition toward sustainable food systems for the next generation.
- c) Governmental actors and private sector actors should **promote development and access to sustainable innovation, resource hubs, and new technologies** for youth along food supply chains that enhance nutrition and support social enterprises (particularly in countries experiencing high rates of youth internal and external migration).

d) All actors should help showcase profitable ventures and businesses across food systems to give incentives for youth to engage in entrepreneurial opportunities in this sector.

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

40. Food environments comprise foods available and accessible to people in their surroundings and the nutritional quality, safety, price, convenience, labelling and promotion of these foods. These environments should ensure that people have equitable access to sufficient, safe and nutritious foods that meet dietary needs and food preferences for an active and healthy life<sup>38</sup>, 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.

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

**Commented [AS42]:** Emphasize that 43% of the agricultural labour force in developing countries is made up by women. Even 79% of economically active women in the developing countries report agriculture as their primary source of livelihood (FAO 2010-2011, Worldbank/ONE 2014). Therefore, we would highly appreciate if this chapter would not only allocate to youth but would also include women.

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**Commented [RN43]:** The suggested inserted text by PSM is intended to highlight that youth will be attracted into food systems occupation and entrepreneurship only if they see an opportunity for a profitable business. This can be inserted in a separate paragraph or integrated within the text.

### 3.3.1 Improving access to food that contributes to healthy diets

- a) ~~Governmental actors should take into consideration the guidance developed by FAO and WHO to ensure that in times of crisis, e.g. pandemics, the integrity of the food chain is maintained, and adequate and safe food supplies are available for all people.~~
- b) Governmental actors should improve the availability and access of nutritious food 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.
- c) Governmental actors should **take into consideration an equity lens** when investing in actions to address food environments and ensure members of historically marginalized and vulnerable communities, residents of low-income communities, Indigenous Peoples, peasants, people facing physical constraints due to age, illness, or disability, and people living in rural areas have sufficient access and ownership to/of diverse food markets in accordance with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).
- d) Governmental actors should **minimize physical barriers** so that people can grow, purchase, order or eat diverse types of foods that contribute to healthy diets in a given food environment. This can be done by instituting urban planning policies that encourage retail outlets that sell affordable nutritious foods that contribute to healthy diets, ~~and that restrict the growth of retail outlets which sell an overabundance of foods high in energy density with minimal nutritional value,~~ and promote home food production and gardens, where appropriate.
- e) ~~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 high in energy density with minimal nutritional value, and this while ensuring food safety.-~~
- 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.

**Commented [RN44]:** Recommend that this section incorporate FAO Guidance on food supply chains related to Covid-19, namely ensuring that barriers to access are lowered.

Focus on ensuring access to food during and after pandemic to minimize potential for hunger crisis.

**Commented [RN45]:** PSM questions the term "overabundance" and the reasoning behind this guidance. Based on this logic should ice cream and pastry shops no longer be allowed?

**Commented [RN46]:** While this idea may have merit for scientific literature to explore, it is far too premature and untested for inclusion in an intergovernmental text, nor are zoning laws or tax incentives an area of FAO expertise

**Commented [RN47]:** In the event para d) remains, PSM requests the additional text at the end of 3.3.1 (d).

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

- a) Governmental actors should **consider fiscal policies and government-led voluntary industry initiatives to promote the affordability** of healthy diets. This includes subsidies to promote nutritious food options to ensure they are affordable and competitive compared with food and beverages high in energy density with minimal nutritional value ~~for which industry tax benefits for their development and marketing should be removed.-~~
- b) Governmental actors should **strengthen public procurement systems** by ensuring healthy diets are available and convenient in public settings and institutions such as kindergartens and other childcare facilities, schools, hospitals, foodbanks, workplaces, government offices and prisons in line with national food-based dietary guidelines.
- c) Governmental actors should **link the provision of healthy school meals with clear nutritional objectives**, aligned with national food-based dietary guidelines and adapted to the needs of

**Commented [AS48]:** Rationale as per 3.4.D above

There is no evidence that taxation on foods and beverages has an impact on public health. Whereas some studies have shown that taxes may decrease consumption of the products targeted, there is little evidence of the impact of fiscal measures on public health. In most cases, existing evidence relies solely on model-based economic assessments which have limitations about the effect of taxes on individuals' total calorie intake and their weight.

**Commented [RN49]:** This recommendation lacks an evidentiary basis, nor does it consider economic tradeoffs to an industry.

different age-groups, with special attention to the needs of adolescent girls. Policymakers and UN agencies should consider **promoting home grown school meals**, where food served in schools is procured from local, smallholder and/or family farmers.

- d) Governmental actors and intergovernmental organizations should facilitate the affordability of healthy diets for poor households through **social protection programmes** such as vouchers, cash, school feeding, or **food supplement programmes**.
- e) Governmental actors, consumers, and farmer organizations should promote the availability of nutritious food that contributes to healthy diets through **local farmers markets, community cooperatives and other community-building efforts** that engage people around local food cultures.

**Commented [AS50]:** This reference is not clear.

### 3.3.3 Monitoring and supporting new technologies and promoting trends and approaches to promote-for healthy diets

- a) Governmental actors should understand and acknowledge the influential roles of the **internet, social media, and online marketing of foods**, and should work toward monitoring and encouraging media companies to promote nutritious foods that contribute to healthy diets on social media spheres.
- b) Governmental actors should recognize the growing trend of **food purchased online and consumed away from home** (including street food) and should incentivize restaurants/online outlets to offer prepared dishes made from nutritious foods that contribute to healthy diets, display information about food on menus (i.e. calories, product composition, and other nutritional content), avoid food waste, and adhere to food safety regulations.

**Commented [AS51]:** The focus here is mostly on new "communication" technologies, hence the suggestion to change the title to better cover the content of the paragraphs."

## 3.4 FOOD SAFETY ACROSS SUSTAINABLE FOOD SYSTEMS

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

### 3.4.1 Adopting national and international cooperation on food safety

- a) Governmental actors should **promote food safety within their food systems policies or develop food safety 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 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 pesticide residues, antimicrobial residues, endocrine disruptors, **the use of unauthorized chemical and unsafe food** additives, pathogenic bacteria, viruses, parasites, and fraud/adulteration of food products.

#### 3.4.2 Ensuring food safety across food production systems

- a) Governmental actors and private sector actors should **consider a One Health Approach**<sup>39</sup> 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, **OIE**- 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 [AS52]:** Reference to “chemical and unsafe food additives” is inaccurate and should be rephrased. Authorized food additives are safe. This wording is not used by Codex nor is it descriptive or appropriate for conveying that an additive is unauthorized, unsafe or unapproved. As such, chemical should be deleted, but retaining unsafe is appropriate.

**Commented [AS53]:** Recognize the importance for an adequate evaluation of any new technology before entering the marketplace. However, we think this paragraph could use more balance as only the risks and unintended consequences are considered here: We would like to emphasize that also the potential of a new solution (e.g. to improve food security or overcome climate change challenges) should be evaluated and considered appropriately. Decisions should always be done on “rigorous science and evidence” as laid down under 3.2.1 d, page 15 without compromising on safety.

**Commented [RN54]:** Note the missing OIE reference.

**Commented [RN55]:** Language suggested for addition to para a) or as a stand alone para:  
“The private sector should be fostered to reach certification of their Food Safety Management System, recognized as a way to control food safety.”

### 3.5 SOCIAL RELATIONS, KNOWLEDGE AND CULTURE OF DIETS

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

<sup>39</sup> 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/>

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

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

- a) Governmental actors should **develop national food-based dietary guidelines** for different age groups that define context-specific, diverse, healthy diets by taking into account social, cultural, scientific, economic, ecological and environmental drivers.
- b) Governmental actors should **develop science and evidence-based nutrition standards and support the development of robust codes of conduct on the restrict marketing** (including digital marketing), promotion and sponsorships exposure, **especially of children aged 12+ or younger of, to foods high in saturated fat, sugar and salt energy density with minimal nutrition value and sugar sweetened beverages**, in accordance with multilaterally agreed rules and national legislation **and taking into account existing best practice in the private sector, where applicable.**
- c) Governmental actors should **regulate the marketing of commercial infant formula and other breast-milk substitutes and** implement the **1981 International Code of Marketing of Breast-Milk Substitutes<sup>40</sup>** and subsequent WHA **relevant** resolutions **taking into account their national contexts.**
- ~~e)~~ Governmental actors should **regulate nutritional labelling and consider front-of-pack labelling (FOPL) to promote healthy diets.** The FOPL system should be aligned with national public health and nutrition policies and food regulations, as well as relevant WHO guidance and Codex guidelines. **The FOPL system should be easy-to-understand, objective, fact- and science-based.** The FOPL system should **be underpinned by an appropriate comprise an underpinning nutrient profile model, that considers the overall nutrition quality of the product or the nutrients of concern for NCDs (or both). Complementary policies could be considered for foods of high energy density with minimal nutritional value to not be sold or marketed in public places or near schools, including kindergartens and child care facilities.**
- ~~e)d)~~ Governmental actors should provide incentives to private sector actors to **design food markets, restaurants, and other places** where food is sold or served by encouraging the placement and promotion of foods that contribute to healthy diets in retail spaces.
- ~~f)e)~~ Governmental actors, UN agencies, NGOs, and medical and health practitioners should consider **coupling nutrition education and counselling** to populations participating in maternal and child nutrition programmes.
- ~~f)f)~~ Governmental actors, UN agencies, NGOs, and medical ~~and~~ health practitioners **and the private sector support** should **promote social and behavior change communication (SBCC)** and social support interventions as a way to positively influence knowledge, attitudes and social norms,

**Commented [RN56]:** The role of the consumer is not addressed—even if consumer activity can ultimately drive the foods private sector provides. Consumer roles/responsibilities should be mentioned.

**Commented [AS57]:** References to regulation and restrictions around marketing should be more thoughtfully drafted to reflect a multistakeholder approach and be based on evidence.

There is broad academic consensus that by the age of 12, children have developed the skillsets necessary to understand the persuasive intent of marketing communications and are able to appraise commercial messages critically. So only children aged of 12 and younger should be considered here.

**Commented [AS58]:** There is no “other breast-milk substitute.”

**Commented [RN59]:** As per WHA resolution 69.9

**Commented [RN60]:** See 3.4.2 (d) above

**Commented [RN61]:** Overbroad, with references to public places. Crosses over into general sales restrictions which is undefined, vague and has significant economic tradeoffs.

**Commented [RN62]:** PSM suggests the deletion of wording, since it refers to approaches that do not reflect consensus neither among member states, nor within industry. It is an issue under discussion in more relevant fora such as Codex.

**Commented [RN63]:** PSM suggests including the private sector in this initiative as it has been working in collaboration with governments, civil society, scientists and academia for many years in programmes aimed at improving the knowledge, health and well-being of people around the world and have a wealth of expertise in nutrition science, marketing research, marketing and consumer insights. Mass media and public education campaigns can benefit from the expertise of the private sector.

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

and coordinate messaging on nutrition across a variety of communication channels to reach multiple levels of society (e.g. mass media campaigns).

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

### 3.5.2 Encouraging local food knowledge and culture

- a) Governmental actors, civil society organizations, **the private sector** and UN agencies should use **science and** 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, **the private sector**, community leaders, social workers, and health professionals should **encourage food culture** and the importance of food in cultural heritage, culinary skills and nutrition literacy among communities. This can be done through community and consumer associations and educational institutions, targeting men and women.
- c) Governmental actors should **protect and promote the knowledge that Indigenous Peoples** have with regard to local traditions and methods of producing, preparing, and preserving food that imparts nutritional and environmental benefits.

**Commented [A64]:** See comment in para 3.5.1.g. above

**Commented [A65]:** See comment in para 3.5.1.g. above

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

- a) Universities and schools should **institute a nutrition curriculum** for all medical, nursing, and agriculture and food technology students during training.
- b) Governmental actors, civil society organizations and UN agencies should **promote culinary skills** among school-age children, adolescents and adults (including promoting communal mealtimes, socializing around food, consuming healthy diets, and reducing food waste) in schools, workplaces and community centres, **as well as equip youth with knowledge, and ability to learn about healthy eating habits, how to grow/produce nutrient-dense foods, and how to prepare them.**
- c) Governmental actors should **adopt and implement comprehensive school food and nutrition policies**, review education curricula to incorporate nutrition principles, involve communities in promoting and creating healthy food environments and healthy diets in schools, and support school health and nutrition services.
- d) Governmental actors, intergovernmental organizations, NGOs, and civil society organizations should **engage in nutrition dialogues with communities** by drawing on the knowledge, experience and insights of individuals who are not usually regarded as members of the nutrition community (e.g. community and religious leaders, chefs, supermarket buyers, influencers on

**Commented [RN66]:** In addition to supporting culinary schools, PSM notes it is important to promote agriculture literacy skills.

social media, youth leaders, farmers and food producers, young entrepreneurs, mayors and local communities).

### 3.6 GENDER EQUALITY AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS

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

**Commented [AS67]:** We acknowledge the full chapter on women under 3.6 and see many important topics tackled here. In addition, we are unclear why chapter 3.6 does not mention living wages as well as the promotion of "development and access to sustainable innovations, resource hubs and new technologies" (3.2.6 b and c). We would kindly like to ask the CFS to reconsider these aspects.

#### 3.6.1 Empowering women

- a) Governmental actors should **pass laws that promote equal participation** between women and men in political decision-making, supporting women with specific attention to rural women, holding leadership roles in decision making bodies – parliaments, ministries and local authorities at district and community levels – so that they can be part of the process of devising solutions to the malnutrition challenges they face.
- b) Governmental actors should **promote an enabling environment to generate cultural changes towards gender equality** with specific policies, programmes, institutions and advocacy campaigns to deal with the various forms of discrimination and violence women face.
- c) Governmental actors and intergovernmental organizations should **increase adolescent girls' and women's human capital** by ensuring they have access to education, literacy programmes, health care, and other social services as a way to increase household nutritional status.

#### 3.6.2 Promoting and acknowledging women as food system entrepreneurs

- a) Governmental actors should **ensure women's equal tenure rights** and promote their equal access to and control over productive land, natural resources, inputs, productive tools, and access to education, training, markets, and information in line with the CFS VGGT.
- b) Governmental actors, private sector actors, and intergovernmental organizations should **enhance women's roles in agriculture** by giving women decision-making power over what they choose to produce, and how they choose to produce those crops/food. Women should be offered equal levels of access to extension and advisory services for crops and animal products that they produce or process, capacity-building to engage with traders, financial services (credit and savings mechanisms), and entrepreneurial opportunities across food systems.

- c) Governmental actors, NGOs and private sector actors should **promote and increase access to labour and time saving technologies**<sup>41</sup> that could help improve the livelihoods of women.
- d) Governmental actors and private sector actors should **facilitate women's equal access to entrepreneurship and employment opportunities** across food systems and related activities to generate income and increase their participation in decisions on the use of household income and build and manage savings without reinforcing unequal gender roles. This would include household and business budget training, decision-making skill development, scaling of financial services and products both accessible and relevant to women's needs, and tools to help men and women strengthen their intra-household communication.

### 3.6.3 Recognizing women's nutritional status and deprivation

- a) Governmental actors, intergovernmental organizations, NGOs, and development partners should **pay specific attention to the nutritional well-being of adolescent girls and women** and provide health and nutritional care and services through various sectors. This can be done by ensuring that national development strategies are driven by gender analyses, and that those women and adolescent girls with compromised nutritional status and higher levels of deprivation, are the recipients of social protection policies and benefits.
- b) Acknowledging the significant time and work burden of women in the preparation of nutritious meals, and their roles in agriculture and food production, governmental actors should **recognize and value the importance of unpaid care work** at the household level through the effective implementation of protective laws, social protection programmes, and other benefits, and should enable gender-equitable distribution of care work. The equal participation of men in unpaid work should be promoted, especially where women are also active in productive labour.
- c) Governmental actors should create an enabling legal framework and supportive practices to **protect and support breastfeeding**, ensuring that decisions to breastfeed do not result in women losing their economic security or any of their rights. This should include implementing maternity protection legislation, including entitlement to publicly-funded paid maternity leave (or paternity leave), and removing workplace-related barriers to breastfeeding (lack of breaks, facilities, and services).

## 3.7 RESILIENT FOOD SYSTEMS IN HUMANITARIAN CONTEXTS

44. Linking food security and nutrition interventions during humanitarian crises (man-made and climate-related disasters) with longer-term strategies to strengthen the resilience of food systems is key. Short or protracted crises are often brought on by conflict and climate change, displacing millions which increases their risk of food insecurity and malnutrition. Considering the importance of resilient food systems, this section highlights the importance of strengthening the nexus between humanitarian and development programming and builds upon the 11 principles in the CFS Framework for Action for Food Security and Nutrition in Protracted Crises (FFA)<sup>42</sup>.

**Commented [RN68]:** Given Covid-19, recommend bringing this section further to the top and making more prominent. Resiliency in our food systems to prevent humanitarian contexts is a key issue given the pandemic. Also recommend making explicit references to the consideration that Member States should give to policy tradeoffs in this section, given the potential for such tradeoffs to implicate food security.

<sup>41</sup> 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.

<sup>42</sup> CFS Framework for Action for Food Security and Nutrition in Protracted Crises

### 3.7.1 Protecting the most vulnerable to malnutrition in humanitarian contexts

- a) Governmental actors and humanitarian organizations should pay particular attention, protection, and **facilitate access to nutritious food and nutritional support to most vulnerable and marginalized groups.**
- b) Governmental actors and parties involved in conflicts should **respect and protect the equal and unhindered access** of all members of affected and at-risk populations to food security and nutrition assistance, in both acute and protracted crises, in accordance with internationally recognized humanitarian principles, as anchored in Geneva Convention of 1949 and other UNGA Resolutions after 1949.
- c) Governmental actors, with the support of the UN system and international assistance and cooperation where appropriate, should ensure **access to nutritious food and nutritional support for refugees and asylum seekers** in their territory, in accordance with their obligations under relevant international legal instruments.

### 3.7.2 Improving the quality of food and nutrition assistance

- a) Governmental actors, all parties involved in conflicts, climate-related disasters and food assistance, including humanitarian organizations, should **ensure that food security and nutrition assessments and analyses** (such as the Integrated Phase Classification System) are undertaken throughout a crisis to inform the food and nutrition response as well as any components of the local food system requiring rehabilitation.
- b) Governmental actors should recognize nutrition as an essential need and humanitarian assistance should **aim to meet nutritional requirements of the affected population**, particularly the most vulnerable to malnutrition. Any food items provided should be of appropriate nutritional quality and quantity, be safe and acceptable, and not harm local markets. Food must conform to the food standards of the host country's government in line with the Codex Alimentarius standards about food safety, quality, and labelling.
- c) Governmental actors and humanitarian assistance organizations should be encouraged to **purchase locally produced, fortified food** (including Ready to Use Supplementary and Therapeutic foods in some contexts) and ensure they are available through social protection mechanisms and acute malnutrition management programmes, with improved coverage during times of crisis. Fortification should be used only in limited times and places and should not disrupt local market and accessibility of nutritious food in the longer term.
- d) Governmental actors should **have an explicit policy on infant and young child feeding (IYCF) in emergencies**, and governmental actors, UN agencies and NGOs should ensure that such policies on IYCF practices are implemented, coordinated, promoted, and improved upon during humanitarian crises.
- e) UN agencies and humanitarian assistance organizations should ensure that when implementing cash and voucher assistance, **the minimum expenditure basket and transfer value is promoting nutritious food** that is locally available and sufficient to provide a healthy diet for all stages of the lifecycle.

### 3.7.3 Ensuring food systems are resilient in humanitarian contexts

- a) Governmental actors in partnership with relevant organizations should **develop and use early warning systems, climate information services, and food and agriculture information systems** that detect and monitor threats to food production, availability and access as well as food safety and tampering. These early warning systems should be integrated into broader food analysis systems including the monitoring of the availability and affordability of nutritious foods that contribute to healthy diets at the local level.
- b) Governmental actors, development partners and donors should **invest in disaster risk reduction measures** that benefit those most at risk/need. In particular, productive assets should be protected from severe weather and climate impacts in a way that strengthens the resilience of affected populations and their ability to cope with shocks due to conflicts and climate -related disasters. Governmental actors should aim to restore local food production and market accessibility as rapidly as possible.
- c) Intergovernmental organizations particularly the UN agencies and development partners should **use local organizations in the implementation of humanitarian food assistance** and livelihood programmes to support economic recovery and development, strengthen sustainable local food systems and foster the ability of smallholders and/or family farmers to access resources to bolster production and markets.

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

### 4.1 POLICY FORMULATION AND IMPLEMENTATION OF THE VGFSyN

49. All CFS stakeholders are encouraged to **promote at all levels** within their constituencies, and in collaboration with other relevant initiatives and platforms, the **dissemination, use and application of the VGFSyN** to support the development and implementation of coordinated and multisectoral national policies, laws, programmes and investment plans. These policy recommendations, however, remain voluntary and should be implemented based on unique national circumstances, priorities and goals.

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,**

**Commented [RN69]:** This section addresses monitoring the use of the policy recommendations in the Guidelines, but fails to provide direction on evaluating the effectiveness of recommendations if they are implemented. The Guidelines should include direction for the establishment of mechanisms to set goals, gather data, evaluate effectiveness, revise policies and/or withdraw those that are not effective.

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

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

#### 4.2 BUILDING AND STRENGTHENING CAPACITY FOR IMPLEMENTATION

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

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

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

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

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

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

#### 4.3 MONITORING OF THE USE AND APPLICATION OF THE VGFSyN

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

59. By implementing the VGFSyN, governmental actors are expected to **contribute to the achievement of the six Global Nutrition Targets (2025)** endorsed by the WHA in 2012<sup>43</sup> and its diet related NCD targets<sup>44</sup>. The VGFSyN should support countries in defining priority actions and formulating “SMART” commitments<sup>45</sup> in order to achieve nutrition objectives as well as to promote the creation of informal coalitions of countries to accelerate and align efforts around specific topics linked to one or more action areas of the Nutrition Decade and the 2030 Agenda. This can be done through advocating for policies and legislation, allowing the exchange of practices and experiences, highlighting successes and lessons learned, and providing mutual support to accelerate implementation.

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

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

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

<sup>45</sup> 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/](https://www.who.int/nutrition/decade-of-action/smart_commitments/en/)