

## Comments on latest version of the CFS Voluntary Guidelines on Food Systems and Nutrition (VGFSyN) – 3 June 2020

### Russian Federation

Dear colleagues from CFS Secretariat,

Following the request of H.E. Amb. Hans Hoogeveen, Chair of OEWG on food systems and nutrition, at the meeting on 28 May, please find below our additional comments to the latest version of the VGFSyN as well as our first reaction to some stakeholder's proposals.

1) **Para 21.** We reiterate our suggestion to delete the reference to «Sustainable healthy diets» throughout the document as this concept does not have a common ground and consensus among Members.

2) In our view, the subchapter «**1.2 Key concepts**» is a crucial part of the document and it should remain.

3) We support the corrections made by Switzerland in the **para 4** (see the Matrix document).

4) The current **para 5** is well structured. If there is an intention to modify it by making special focus on *school-age children* we would propose to consider also categories of *pre-school age children* and *adolescents*.

5) In general we welcome the initiative to make references about COVID-19. It is important to see the text proposals. We agree that **para 9 or para 44** could be a right place to make such references.

6) **Para 10.** We propose to add «*food*» before «*and nutrition are interconnected*» as it is already done in the Matrix document.

7) **Para 14.** We agree with the textual corrections proposed in the Matrix document and suggest to stay with the whole paragraph without any deletions.

8) The definition of «healthy diets» in **para 20** seems to us acceptable. We hope that it will remain technical. This paragraph is about healthy lives of all people and all citizens without any exemptions. So we do not think it is appropriate to insert the dimension of «women's empowerment» as proposed in the Matrix document.

9) **Para 23.** We are flexible with regard to the initiative of re-incorporation of food systems and sustainable food systems as suggested by Switzerland, Canada, EU and CSM.

10) In general **32-d** is a valuable paragraph and we welcome the modification made in the Matrix document.

11) **311-a** is an important recommendation. In general we could agree with the amendments proposed in the Matrix document.

12) **311-bis** also very important. In general we could agree with the amendments in the Matrix document. We also propose to write «healthy nutrition» instead of «improved nutrition».

13) **311-c and 311-d**. In our view, it is necessary to focus these recommendations on «national policies» and «internationally agreed food safety standards». We echo the call to move the reference to Codex and WOAHA standards to a footnote (see the Matrix document).

14) **321-b**. In our opinion, this recommendation should give a clear signal on the «mitigation of the negative impact of pesticide usage» and «prevention of inappropriate use and overuse of fertilizers». So, these additions will be welcomed (as already in Matrix document).

15) **321-c**. We agree to add «health and water quality» aspects to the recommendation on instituting surveillance systems (as in Matrix document).

16) **323-b and 323-d**. We support these recommendations and the respective amendments in the Matrix document

17) **324-e**. We are in favor of deleting the reference to «taxes» from this para.

18) **326-a** is an important recommendation. The respective amendments from Indonesia, Switzerland and USA (Matrix document) are clear and they definitely improve the text.

19) **332-a, 333-a, 333-b and para 42**. Our proposal is to add «safe» in the context of promotion of nutritious food. Example – «*promote safe, nutritious food*».

20) **Paragraph 41** on food safety is indeed very important. We are flexible on the amendments in the Matrix document except the last sentence, which, in our view, is outside of the current context.

21) **342-b**. We propose to replace «Codex ad hoc Intergovernmental Task Force» with «Codex Alimentarius Commission» as the Commission is the decision-making body unlike the Task Force.

22) **343-c**. We prefer the current text of this paragraph without modifications.

23) **351-b**. This recommendation is valuable. We expect that it will remain and keep focus on all groups of population, including children.

24) **351-e**. We support this recommendation in general. The changes in the Matrix document are fine.

25) **353-c**. We welcome the modification of the paragraph as in the Matrix document.