



CFS Voluntary Guidelines on Food Systems for Nutrition (VGFSyN) Draft for Negotiations

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Commented [USG1]: This should be "equity" rather than "equality." Ensuring equality does not ensure equity so this matters. For example, ensuring equal opportunities for ag extension for men and women usually means women don't have access because there are too many barriers, such as child care needs, household duties. Equity means these issues are dealt with.

PART 1 - INTRODUCTION

1.1 BACKGROUND AND RATIONALE

1. **Malnutrition in all its forms** – ~~undernutrition~~ wasting, chronic malnutrition, micronutrient deficiencies, overweight, and obesity – is ~~one of the~~ a major global challenges that countries face and is a result of food insecurity¹, along with many other factors and causes. Malnutrition, in at least one of its forms, affects every country in the world and most countries are affected by multiple forms. The impacts of malnutrition have profound consequences on people’s health and wellbeing, physical and cognitive development, and livelihoods throughout their lifetime and across generations. High malnutrition rates can also take a heavy toll on national GDP due to lost productivity and high medical care costs. Malnutrition is a ~~major impediment~~ key indicator of gaps in 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.

Commented [USG2]: Greater specificity

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, and a source of increase ~~s~~ the susceptibility to infectious diseases during childhood, and ~~risk of~~ non-communicable diseases (NCDs) in adulthood. Wasting and edema, also known as acute malnutrition, poses a significant risk of increased morbidity and mortality in children. Stunting, largely a result of ~~also known as~~ chronic malnutrition, is associated with delays in both physical growth and cognitive development.

Commented [USG3]: Nutrition status is an indicator of success, not an impediment to success. Impediments include poverty, lack of nutrition education, etc.

Commented [USG4]: Stunting and chronic malnutrition are not the same thing. Stunting is largely a result of chronic malnutrition, but also other issues. Stunting is a syndrome that results from a poor growth environment.

¹ “Food security exists when all people, at all times, have physical, economic and social access to sufficient, safe and nutritious

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food to meet their dietary needs and food preferences for an active and healthy life". FAO, 1996. Rome Declaration on World Food Security and World Food Summit Plan of Action.

3. **Micronutrient deficiencies** related to the inadequate intake of food rich in iron, vitamin A, iodine, folate, vitamin D, and zinc, ~~among others and other essential nutrients~~, affect a large proportion of the global population with serious consequences on health, well-being, and development. Nutritional needs vary across the lifecycle. 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 have~~ 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.

Commented [USG5]: Doesn’t make sense to say “across their lifecycles” since the list is of particular stages in a lifecycle, like under 5, adolescence, childbearing age, etc.

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, ~~who are at-putting them at~~ an increased risk of becoming undernourished as children, ~~into adulthood~~ as well as overweight ~~and-or~~ obese as adults. Maternal obesity poses short- and long-term risks for maternal health, and also risks to child health and wellbeing including poor cognition and increased risk of neurodevelopment disorders early in life, ~~as well as an and~~ increased ~~susceptibility-prevalence to of~~ obesity and susceptibility to NCDs in adult life. Malnutrition in children results in reduced stature, diminished physical and mental health, ~~and~~ poor school performance in childhood as well as; reduced economic productivity ~~and opportunities~~, and increased vulnerability to NCDs and other chronic diseases in adulthood. ~~These diseases lead to early death~~ and increased morbidity and disability, ~~which and~~ require higher spending on health care ~~and~~; placing significant burdens on national health care systems and economies.

Commented [USG6]: Suggested edits as the provided examples all refer to child health

Commented [USG7]: Lack of clarity on what is meant by these diseases. Is this NCDs? Malnutrition? Chronic disease?

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, ~~and~~ hygiene, and insufficient access to safe drinking water, insufficient access to quality education and health services, low socioeconomic status, and marginalization. Basic causes of poor nutrition ~~encompass-include~~ the factors societal structures and processes that ~~slow down the realization of human rights and~~ perpetuate poverty ~~and~~, limiting or denying the access ~~of vulnerable populations~~ to essential resources for achieving optimal nutrition and health for vulnerable groups.

Commented [USG8]: While problematic, is this an underlying cause of malnutrition?

Commented [USG9]: Too vague. The relevant issues are listed in the rest of the sentence.

7. **Poverty and inequality** are important underlying causes of hunger and malnutrition in all its forms. Low ~~and under~~employment ~~rates~~, low wages, ~~and~~ incomes, and decreased purchasing power have negative consequences on nutrition and health outcomes. ~~Negative economic trends limit the capacity of national governments to deliver essential~~ Under-resourced food assistance programs, nutrition-relevant services, nutrition-related services, 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 further~~ contributes to poor nutrition and health outcomes as well as to marginalization and

Commented [USG10]: There could be many reasons that governments do not provide adequate safety nets.

Commented [USG11]: Inequality does not result in food insecurity and poor nutrition if low income groups have enough income to support their basic needs or if the safety net provides for basic needs.

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social exclusion, ~~and which~~ 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 those who live in impoverished conditions are~~ particularly vulnerable to malnutrition ~~because of their persistent or temporary poverty.~~

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

10. **Climate change, agriculture**³, 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, ~~and floods affect impact~~ agriculture, with the largest effects being decreased crop yields and livestock productivity, as well as declines in fisheries and agroforestry production in areas already vulnerable to food insecurity. Climate change also ~~impacts affects~~ 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** have become a major risk factor of multiple forms of malnutrition and poor health outcomes globally. Global dietary patterns have been changing, affecting people ~~across all parts of over~~ the world. In many regions ~~of the world~~, dietary changes are shifting towards the over consumption of ~~convenient~~ food and beverages with high content in sugar, and/or in saturated fat, and/or salt content. ~~Diets based on these foods which~~ are associated with an increased prevalence of overweight, obesity and certain NCDs.

11-12. **Profound dietary changes, both positive and negative**, are occurring for several reasons, including the movement of people to urban places, the increased purchasing power and preferences of newly middle-class consumers, the influence of globalization and trade ~~within the food system~~, ~~the continued loss of access to and movement away from~~ traditional diets, and changing lifestyles.

12. **Food systems**⁴ are complex webs of activities and actors involving ~~the food~~ production, processing, handling, preparation, storage, distribution, and consumption of food, and ultimately waste of food. ~~They are constantly being shaped by different forces, drivers and decisions can affect food systems and the provision and consumption of food that contributes by many different individuals. Every food system has the capacity to be equitable and to produce healthy diets needed to healthy diets for optimal nutrition. But, they can also be shaped by power concentration and imbalances, which may not be inclusive and equitable. Some~~ The sustainability of food systems – including environmental, social and economic sustainability – determines the ability of food systems to provide healthy diets for current and future generations ~~food systems are sustainable while others show their limits in terms of sustainability~~.⁶ This indicates that in order to improve nutrition, context-specific changes are needed not only in agriculture and food policies, but also across multiple sectors and policy areas that address the sustainability of food systems⁵. ~~and inefficiency in natural resource utilization, and in the use of labour and energy, leading to~~

Commented [USG12]: Simple statement preferable to a list of peoples who could be in impoverished conditions.

Commented [USG13]: The problem is high sugar, saturated fat and salt, not convenience per se. Apples are convenient.

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Commented [USG14]: These should be a separate paragraph instead of being shoehorned into the paragraph on unhealthy diets.

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Commented [USG15]: The suggestion that the transition away from traditional diets is due primarily to reduced access does not reflect the dynamic of the transition, including such things as increased demand for protein and fruit and veg, cultivation opportunity costs, time-cost of traditional diets, etc.

Commented [USG16]: This paragraph should provide a concise description of the two reasons for the guidelines: importance of a food systems approach and of sustainability for improving nutrition. Without a sharp focus, the rationale for the guidelines is lost in a listing of problems and objectives.

Commented [USG17]: This paragraph should provide a concise description of the two reasons for the guidelines: importance of a food systems approach and of sustainability for improving nutrition. Without a sharp focus, the rationale for the guidelines is lost in a listing of problems and objectives.

Commented [USG18]: Deleted to keep the focus of this sentence on food systems, not externalities or other sustainability issues.

Commented [USG19]: Why just equitable and not a list of other desired attributes? Best to keep focus on nutrition here.

Commented [USG20]: Too vague and does not fit topic of paragraph, which is to describe what a food system is.

Commented [USG21]: Every food system could be improved and must adapt to changing conditions. Sustainability is not a static state.

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

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

⁴ “Food systems gather all the elements (environment, people, inputs, processes, infrastructures, institutions, etc.) and activities that relate to the production, processing, distribution, preparation and consumption of food, and the output of these activities, including socio-economic and environmental outcomes”. HLPE. 2014. [Food Losses and Waste in the context of Sustainable Food Systems](#). A report by the High-Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.

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~~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 drivers which indicate that, in order to improve nutrition, context specific changes are needed not only in agriculture and food policies, but also across multiple sectors and policy areas that address, for example, national development priorities, economic policies, and social norms⁵.~~

14. ~~Transformation to more sustainable food systems and promoting sustainable food systems⁶ 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.~~

15-14. **Changes in governance** are needed within and across food systems, and its constituent elements, namely food supply chains⁷, food environments⁸, and consumer behaviour⁹ to generate positive outcomes along the three dimensions of sustainability – social, economic, and environmental.

16-15. **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 can influence~~ nutrition outcomes.

17-16. The Committee on World Food Security (CFS) has ~~undertaken a policy process to produce agreed to develop the~~ **Voluntary Guidelines on Food Systems for Nutrition (VGFSyN)**. The preparation of the VGFSyN is informed by the ~~findings and scientific evidence provided in the~~ **High Level Panel of Experts on Food Security and Nutrition's (HLPE)¹⁰ Report on Nutrition and Food Systems**, additional literature, and as well as a consultation process that took place between May and November 2019, which involved the participation of CFS stakeholders in **regional** meetings in Italy, Ethiopia, Thailand, Hungary, Egypt, Panama, and the United States of America, as well as ~~through an~~ electronic consultation.

18-17. This ~~policy~~ process is taking place at the same time as a ~~variety of~~ organizations from different sectors are **working to** 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

⁵ 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.

⁶ "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

⁷ 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

⁸ Food environments "refer to the physical, economic, political and socio-cultural context in which consumers engage with the

Commented [USG22]: It is impossible to list all. Better to use revert to three pillars of sustainability.

Commented [USG23]: Combined with the subsequent paragraph

Commented [USG24]: Throughout the document, "transforming food systems and promoting sustainable food systems" are listed as separate actions. This raises the question as to what food systems are being transformed to. The goal of transformation to more sustainable food systems should be made explicit. Promotion is a necessary part of transformation and doesn't require special mention.

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Commented [USG25]: Institutional and behavioural change does not apply to all actors.

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Commented [USG26]: Implies that government policies need to adhere to social and cultural consequences

Commented [USG27]: This seems to imply a central or single governance structure behind existing food systems, food supply chains, food environments and consumer behavior. This is not true and confusing. For example, what would a change in governance in consumer behaviour mean?

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food systems to make their decisions about acquiring, preparing and consuming food.” HLPE 2017b

⁹ 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

¹⁰ 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.

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2014, at the Second International Conference on Nutrition (ICN2), members of the Food and Agriculture Organization (FAO) and the World Health Organization (WHO) committed to ending hunger and malnutrition in all its forms¹¹. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025)¹² and called upon FAO and WHO to lead its implementation, in collaboration with the World Food Programme (WFP), the International Fund for Agricultural Development (IFAD), and the United Nations Children’s Fund (UNICEF), using coordination mechanisms such as the Standing Committee on Nutrition and multistakeholder platforms such as the CFS. In 2017, the UNGA proclaimed the United Nations Decade of Family Farming (2019–2028)¹³. Specific attention to nutrition has been given by a number of UNGA Resolutions¹⁴, the UN Economic and Social Council (ECOSOC)¹⁵, the UN Environment Assembly¹⁶, the World Health Assembly (WHA)¹⁷, the Codex Strategic Plan 2020-2025, and the UN Special Rapporteur on the Right to Food¹⁸. 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.

19.—The VGFSyN are expected to contribute to and complement these international initiatives with a view to **promoting policy coherence**. They provide evidence-based guidance to help countries operationalize ICN2’s Framework for Action¹⁹ recommendations in support of the progressive realization of the right to adequate food in the context of national food security and of the right to the highest attainable standard of health, and of the achievement of Sustainable Development Goal (SDG) 2²⁰, with particular attention to targets 2.1²¹, 2.2²² and 2.4²³. In addition, the VGFSyN should-can play an essential role in assisting countries to achieve 18. other related SDGs (SDG 1, 3, 4, 5, 6, 8, 10, 12).

1.2 KEY CONCEPTS

20-19. **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-Healthy diets are diversified, balanced, and safe and should limit-minimize the

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

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

¹³ [UNGA Resolution A/RES/72/239](#).

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

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

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

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

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

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

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

Commented [USG29]: Language directly from the resolution

Commented [USG30]: This should either be deleted or text should be added explaining its relevance/significance.

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Commented [USG31]: Language from the WHO constitution.

Commented [USG32]: Reflecting the voluntary nature of the VGs

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Commented [USG33]: The United States remains unconvinced that the CFS and the VGFSyN are the appropriate venues for formally establishing definitions. We note that prior CFS products such as the Principles for Responsible Investment in Agriculture and Food Systems and the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries, and Forests in the Context of National Food Security did not seek to formally establish definitions. Attempting to define terms through the VGFSyN will likely hinder negotiations and delay completion of the document, particularly given the large number of possible definitions for most of these terms and concepts.

Additionally, the underlying logic on how definitions appear in the document is unclear. Some phrases are defined in the key concepts section of the VGFSyN while others including phrases such as “food systems” and “sustainable food systems” are defined in the footnotes, despite being foundational to the document. We urge that all definition be put into footnotes to denote that they have not been negotiated in this document (with the appropriate caveat) and that the section on core concepts be deleted. Deleting this section would eliminate confusion about why some terms are “core concepts” while other more foundational concepts are not. It would also eliminate confusion about the difference between core concepts and principles.

For example, when a non-internationally agreed to term is defined in the footnotes the following language could accompany it: “There are many different definitions used internationally for [defined term]. This definition has not been endorsed by the CFS or the VGFSyN.”

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

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

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

intake of saturated and 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 benefits²⁴;~~

24-20. **Sustainable healthy diets** are healthy diets that combine all the dimensions of sustainability to avoid unintended consequences and undermine healthy diets of future generations. They contribute to the preservation of biodiversity and have a low environmental pressure and impact²⁵.

24-21. **Nutritious foods** are those foods that tend to be *high* in essential nutrients such as vitamins and minerals (micronutrients), as well as proteins, unrefined complex carbohydrates such as fibre, and/or unsaturated fats and are low in sodium, added sugars, saturated fats and industrially produced trans fats.

24-22. **The right to adequate food** is realized when every man, woman and child, alone or in community with others, have the physical and economic access at all times to adequate food or means for its procurement. The right to adequate food implies the availability of food in a quantity and quality sufficient to satisfy the dietary needs of individuals, free from adverse substances and acceptable within given culture. ²⁶.

Commented [USG34]: In line with U.S. regulations and the WHO Action Plan

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Commented [USG35]: Extraneous to the core concept of healthy diets. Perhaps this would fit better elsewhere in the document.

Commented [USG36]: The United States has deep concerns with the phrase “sustainable healthy diets”. Production systems for the same food vary substantially, making it impossible to judge sustainability on the basis of food. It is important to be explicit that sustainability is about how food is produced. “Sustainably produced and healthy diets” are healthy diets that are composed of foods that are produced sustainably.

Commented [USG37]: In line with U.S. regulations and the WHO Action Plan

PART 2 – OBJECTIVES AND GUIDING PRINCIPLES

2.1 OBJECTIVES AND PURPOSE

24-23. **The objective of the VGFSyN** is to contribute to the transformation to more sustainable transforming food systems²⁷ for nutrition and by helping governments and other actors make informed, science-based policy choices that support the availability, affordability, accessibility, and safety of healthy, culturally acceptable diets now and into the future delivered through sustainable food systems. 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 beliefs, culture and traditions, dietary habits, and preferences of individuals, in accordance with national and international laws and obligations”²⁸.

25-24. The VGFSyN ~~follow~~ **present** a **comprehensive, systemic, cross-sector, and science- and evidence-based approach** to building more sustainable food systems addressing policy fragmentation with a special emphasis on the food, agriculture, and health sectors, while also addressing social, environmental and economic sustainability issues to improve current and future food security and nutrition. The VGFSyN provide guidance on potentially effective policies, investments and institutional arrangements. The VGFSyN ~~are expected to address~~ consider the diversity and complexity of food systems with the intention ~~of to promoting policy coherently designed policies that~~ ee, considering benefits and trade-offs, and to fostering and guiding dialogues among different institutions and sectors.

Commented [USG38]: “Sustainable and healthy diets” is not an internationally agreed term. The United States prefers “sustainably produced and healthy diets.” This modified concept conveys simultaneous goals of promoting health and sustainability through balanced, nutritious and diverse diets composed of sustainably produced foods.

Commented [USG39]: As these are guidelines for nutrition, nutrition should be in the objective statement as the ultimate goal. We want diets and food systems that support nutrition outcomes. This paragraph has been written to make this clearer

Commented [USG40]: VGFSyN do more than just address fragmentation.

Commented [USG41]: The VGFSyN do not include healthy policy

Commented [USG42]: Sustainability should not be described as a stand-alone objective. It is an element of the guidelines because it impacts food security and nutrition.

Commented [USG43]: Not all of the highlighted policies will work in every situation. Hence the need for monitoring.

Commented [USG44]: These two phrases should be combined

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

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

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

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

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

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~~26-25.~~ 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.

~~27-26.~~ 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.²⁹ 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

~~28-27.~~ The VGFSyN are non-binding and should be **interpreted and applied-implemented 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~~ [WTO obligations](#), and **with** due regard to voluntary commitments under applicable international and regional instruments. Nothing in the VGFSyN should be read as limiting or undermining any legal obligations to which a State may be subject under international law. The VGFSyN should be interpreted in accordance with national legal systems and their institutions. 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.

~~29-28.~~ The VGFSyN are intended to **avoid duplication of the work and mandate of other international bodies**, and build upon and complement related **guidance contained in other CFS products** with specific attention paid to:

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

Commented [USG45]: Should these voluntary guidelines build off of other relevant high-quality work as well?

²⁹ Because situations can vary widely, the generalizability of evidence to other situations is absolutely crucial, but not always available, for food system actions that address diets and nutrition. Additional research designs are needed to contribute to the

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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.

Commented [USG46]: Suggest rewording this comment. If science or data are lacking, research must be done to justify the policy recommendation.

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

~~30-29.~~ The VGFSyN are **primarily targeted at governmental actors, including relevant ministries and national, sub-national, and local institutions and municipalities, and parliamentarians**, to help them develop processes for the design of 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) a) Intergovernmental and regional organizations, including specialized UN agencies;~~
- ~~b) b) Civil society and non-governmental organizations, including those representing Indigenous Peoples, vulnerable groups and communities, and smallholders, fisherfolks, pastoralists, landless and workers;~~
- ~~b) c) Farmers, ranchers, fisher folks and their organizations and their networks;~~
- ~~b) d) Private sector actors, including agribusiness, food and beverage manufacturers, food retailers including supermarkets, food service providers, industry trade associations, food wholesalers, food distributors, importers and exporters, and the advertising and marketing industry³⁰;~~
- ~~b) e) Research organizations, academic institutions, and universities;~~
- ~~b) f) Development partners, including international financial institutions;~~
- ~~b) g) Private donors, foundations, and funds;~~
- ~~b) h) Consumer associations.~~

Commented [USG47]: Public policy 'design' should involve the public. Governments are less accountable when the public is not involved in developing and implementing policy.

Commented [USG48]: This is the list of other relevant stakeholders and should not include government given the previous paragraph

Commented [USG49]: To include farmers that are not part of an organization

2.3 **GUIDING PRINCIPLES FOR THE TRANSFORMATION TO MORE SUSTAINABLE FOOD SYSTEMS FOR PROMOTING SUSTAINABLE FOOD SYSTEMS NUTRITION**

~~31-30.~~ The VGFSyN include **five guiding principles**³¹ that emerged from the consultation process as foundational when considering the different actions that should be followed to contribute to the transformation to more sustainable food systems and promoting sustainable food systems that supportable healthy diets.

Commented [USG50]: Throughout the document, "transforming food systems and promoting sustainable food systems" are listed as separate actions. This raises the question as to what food systems are being transformed to. The goal of transformation to more sustainable food systems should be made explicit.

~~32-31.~~ 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 improving national food security and nutrition outcomes.

- 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, appropriately 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.

Commented [USG51]: Not all traditional forms of knowledge support sustainable food systems and nutrition. For example, often there are proscriptions against pregnant women and young children eating the most nutritious foods, or there are beliefs that young children don't need the most nutritious foods since they are small and don't work. Often children with diarrhea are not fed or given water to try to dry it up.

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

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

- b) **Coherent and context-specific policies.** Contribute to the formulation and implementation of coherent and context-specific policies and related investment through coordinated actions among different actors and across all relevant sectors at international, regional, national, subnational, and local levels.
- c) **Accountability, transparency and participation.** Support efforts in strengthening governance and accountability mechanisms that contribute to fostering ~~citizen-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 for the identification and management of~~ potential conflicts of interest.
- d) **Healthy, prosperous people, healthy planet.** Promote policies and actions that enhance the livelihoods, health, and well-being of the population, as well as sustainable food production and consumption to protect natural resources, ecosystems and biodiversity, and ~~ensure support~~ 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 ~~production~~ preparation and consumption, while promoting gender-equitable practices.

Commented [USG52]: To fully reflect the three pillars of sustainability. Note this may require further rewording as the principle reads more like an objective.

PART 3 - THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION

~~33-32.~~ 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-promote~~ healthy diets for everyone.

~~34-33.~~ To achieve the WHA and 2030 Agenda targets and national commitments to end malnutrition in all its forms, **a food systems approach is needed** that recognizes that the various parts that make up food systems are interconnected; that any action or decision to address one aspect of a food system will likely impact other aspects, and that food systems respond ~~to~~ and are impacted by other systems, situations, and ~~contexts~~. Thinking systematically and interdisciplinary ~~toward-about the transformation~~ ~~to more sustainable~~ food system ~~transformation~~ can ensure that challenges are tackled from multiple perspectives. Thus, the VGFSyN provide guidance on a mix of ~~potential evidence-based, voluntary, regulatory, fiscal, and other~~ policy actions spanning the diversity of food supply chains, food environment and consumer behavior, as well as the drivers and people that shape those actions.

Commented [USG53]: HLPE food system diagram should be inserted and referenced here.

35-34. These guidelines are structured around seven focus areas: i) transparent, democratic and accountable governance of food systems; ii) sustainable food supply chains 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. These seven focus areas were identified by CFS stakeholders during the consultation process.

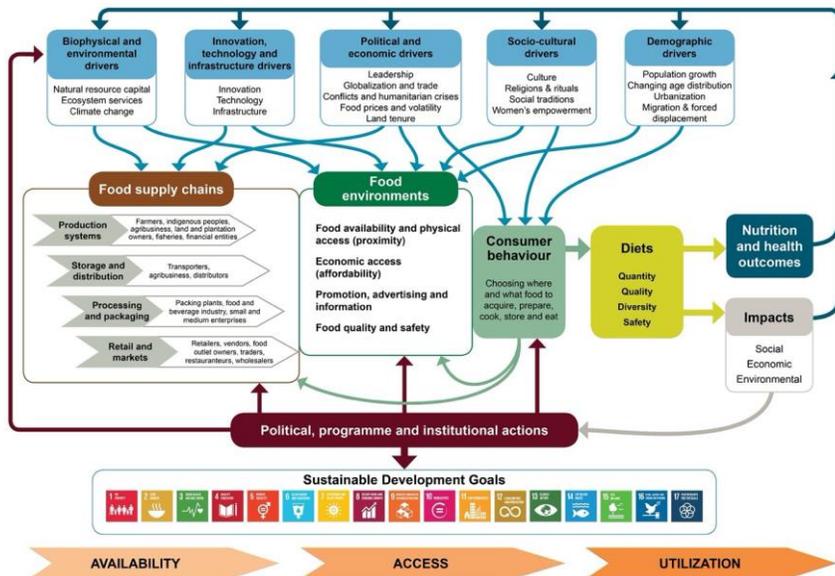
36-35. The HLPE report was structured around three main constituent elements of food systems³² and proposed a wide number of policy areas and drivers of change (See Figure 1). During the consultation process, CFS stakeholders identified a number of cross-cutting factors that are relevant for improving diets and nutrition and hence the origin of these seven focus areas. The first focus area, the governance of food systems, establishes the foundation of the remaining policy recommendations of the VGFSyN. Governance, as a major driver in shaping food systems, is interweaved/interwoven across the six other areas. Three focus areas (ii, iii, and v), cover the main components of food systems while an additional focus area (iv) 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 (focus area vi). The humanitarian context serves as a standalone focus area (vii), because it will continue to be a significant global issue in the context of climate change, protracted crises, conflict and migration.

Commented [USG54]: Since sustainable food systems are integral to all of the focus areas (as discussed previously), there is no need to specify “sustainable food systems” in some of these focus areas. This is redundant and confusing.

Commented [USG55]: The United States expressed concerns regarding the humanitarian discussion in the zero draft and our concerns continue with this draft. We continue to strongly recommend that CFS add language up front that acknowledges these guidelines do not attempt to address the special humanitarian context, which requires distinct considerations and for which other bodies and documents are appropriately positioned to address.

Commented [USG56]: The flow is confusing. Suggest moving the HLPE diagram and discussion to paragh 34 (as noted).

Figure 1: HLPE Food Systems Framework³³



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³² Food supply chains, food environments and consumer behaviours

³³ HLPE 2017b

36. The guidance is principally addressed to governmental actors at the national, subnational, and local level 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 apply 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. Governments are also encouraged to monitor the impact of policy changes to ensure that the implemented policy has the intended result. Though the VGFSyN take evidence from a range of rigorous studies, best practices, and world experience at local, sub-national, and national levels, the generalizability of this evidence to other socio-economic, political, market and environmental situations is not guaranteed.

37.

3.1 TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS

38-37. This section lays out the criticality importance 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 should develop a system to allow for stakeholder comments and consideration of those comments. Governments also need should develop transparent mechanisms for evaluating the distribution of transition costs, costs and benefits of policy action across sectors and actors in order 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-include improving the sustainability of food systems as a priority in order to effectively align relevant sectors around a common set of goals.
- b) Governmental actors should **integrate sustainable food systems 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 Governments should consider increased and improved budgetary allocations to food system activities with clear objectives of improving diets and nutrition with indicators to track and assess the progress in full cost accounting of addressing malnutrition in all its forms.
- c) Governmental actors should promote increased adoption and use of science-based international food safety standards, guidelines, and recommendations (e.g. Codex Alimentarius

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Commented [USG57]: Tension between this statement and the objective to "bring various stakeholders who are involved in food systems to work together"

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Commented [USG58]: Analysis alone is not sufficient; monitoring is also required to ensure that inadvertent harm is not caused and that policies are having the intended effect.

Commented [USG59]: Based on footnote 29. This information is particularly relevant here.

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Commented [USG60]: Unnecessary

Commented [USG61]: Public policy 'design' should involve the public. Governments are less accountable when the public is not involved in developing and implementing policy.

Commented [USG62]: Public interest is often divided.

Commented [USG63]: Not sure we want to make it the priority.

Commented [USG64]: Financial expenditure demands a conversation around tradeoffs. The assumption is that there is not enough investment vs. smarter or well directed or spent investment

Commented [USG65]: Indicators should also allow assessment of the effectiveness in terms of diet and nutrition objectives (not just cost accounting)

Commented [USG66]: The U.S. strongly advises that this goes far beyond the CFS mandate. States should promote nutrition while respecting trade agreements. CFS Guidelines should also respect trade agreements. CFS is not the appropriate forum to discuss objectives on trade agreements

CFS Voluntary Guidelines on Food Systems for Nutrition (VGFSyN): Draft for Negotiations and World Organization for Animal Health standards) by governments, food businesses, and other relevant actors. ~~ensure that international and bilateral trade and investment agreements are consistent with nutrition, food and agriculture national policies, and international food safety standards (e.g. Codex Alimentarius and World Organization for Animal Health standards).~~

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

3.1.2 Strengthening multisectoral coordination and actions

- a) Governmental actors, intergovernmental organizations and development partners across sectors, ministries, and agencies, at all levels, should work to **improve diets and nutrition** ~~across sectors, ministries, and agencies at all levels~~ through strengthened legal-policy frameworks and institutional capacities that address the multiple causes and

Commented [USG67]: Should include footnotes to the relevant references

consequences of malnutrition in all its forms. This coordination should **establish and/or strengthen multisectoral, and 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 and ensuring** ~~ensure~~ 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, ~~researchers,~~ consumer and farmer associations, donors, and development partners. This dialogue should include all dimensions of **sustainable** food systems, ~~as well as including~~ the protection of natural resources and the environment, ~~as well as social and economic sustainability cohesion and inclusion.~~
- c) Governmental actors, intergovernmental organizations, and civil society organizations should **encourage increased commitment to action with responsible investment**³⁴ from the public sector, private sector actors, and donors to support sustainable food systems that promote healthy diets, while considering trade-offs with other policy priorities.

Commented [USG68]: This is unclear as to what exactly is being referenced here. Needs further clarification. Also unnecessary.

3.1.3 Creating accountability mechanisms ~~and tools for~~ monitoring and evaluation

- a) Governmental actors should establish or strengthen **evidence-based** regulatory and ~~legislative policy frameworks~~ to ~~govern guide~~ private and public sector activities related to food systems. They should **institute robust and, transparent accountability mechanisms** that promote good governance, public deliberation, independent bodies that monitor compliance and performance, individual complaint procedures, ~~and~~ remedial actions to improve accountability, ~~systematic identify and management of~~ conflicts of interest, ~~and vested interests, power imbalances,~~ and capacity to settle disputes that may undermine public health. Governmental actors should ensure that dialogue with the private sector is transparent and follows clear roles and responsibilities for engagement to safeguard the public interest.
- b) Governmental actors, in partnership with research organizations and intergovernmental organizations, should improve the availability and quality of **multisectoral information systems and national surveillance systems** that capture, harmonize and disaggregate data and indicators across all aspects of food systems and outcomes related to food security ~~and food safety~~, diets (particularly dietary intake and dietary quality), food composition, and nutrition (including the measurement of micronutrient **status** 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.

Commented [USG69]: Policy is more descriptive as changes may or may not require legislation depending on the local context.

Commented [USG70]: Unclear what specifically is being recommended here

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

3.2 SUSTAINABLE FOOD SUPPLY CHAINS FOR IMPROVED DIETS AND NUTRITION IN THE CONTEXT OF CLIMATE CHANGE

39-38. Food supply ~~patterns chain~~ play an important role in health and environmental sustainability. Food supply ~~ie chains~~ - from production, storage, processing and packaging, and ~~distribution 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 supply ~~chainsies~~ in the midst of climate change and natural resource degradation.

3.2.1 Prioritizing climate adaptation and mitigation across food supply chainsies

- 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~~ **enhance the resilience of 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 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-improve the efficiency of~~ **fertilizer and** pesticide usage. Governmental actors should promote optimization of agricultural outputs per unit of water, energy, **labor,** 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~~ **soil health and water quality**), **farm income, food price,** 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 **climate change** mitigation and resilience strategies ~~to climate change~~ for sustainable food systems and ~~sustainable-~~ **sustainably produced** 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 behavior are~~ **contribute to support food producers in their efforts to adapt** ~~able to~~ to climate change, ~~mitigate their impact, and reduce natural resource degradation, disaster, and other disruptions.~~

Commented [USG71]: The terminology “food supply patterns” is better captured by the commonly used “food supply chains” as is done in the rest of this section.

Commented [USG72]: Globalized chains could also be simple.

Commented [USG73]: Improving nutrition as food moves through the supply chain is not a generalizable possibility or goal. Unclear exactly what is intended.

Commented [USG74]: Unclear on the meaning of this statement

Commented [USG75]: This is not reflected by the recommendations in this section

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Commented [USG76]: Unclear as to why just the word assist is in bold. Suggest instead that the main action in the paragraph “enhance the resilience of food supply chains”.

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Commented [USG77]: Oddly specific and out of place in the paragraph. Perhaps it can be added with more detail as footnote to “protecting crops, livestock and fisheries.”

Commented [USG78]: Reducing use of fertilizer and pesticide may not be the sustainable choice. Closing productivity gaps to enhance nutrition, food security and reduce poverty may require greater use of these inputs.

This may particularly be the case if climate change introduces new pests.

Commented [USG79]: Outcome based indicators are preferable.

Commented [USG80]: Edit to reflect that what is requested is broader than demand. Could include handling and storage practices to increase food safety and reduce food waste.

Commented [USG81]: The whole supply chain needs to be resilient to climate change and other disasters – not just food producers.

3.2.2 Ensuring-Promoting 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~~**manner**, 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.
- b) Governmental actors should **improve the management and control of water resources** for agriculture and food production through improved regulation, ~~community~~ participatory approaches, ~~market-based approaches~~, and water stewardship approaches that involve civil society organizations, private sector actors, and other stakeholders. A systems approach to water resource management should include expanding watershed protection and restoration to improve water quantity and quality.
- c) Governmental actors should **foster the protection, conservation, and sustainable use of biodiverse, productive systems** that include, ~~where appropriate~~, 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~~³⁵ in a manner that is economically viable ~~for all legitimate tenure rights holders to uphold those rights and maintain livelihoods~~.
- d) Governmental actors should **protect the rights of Indigenous Peoples, small-scale producers, peasants, and other communities** with customary tenure systems that exercise self-governance of land, fisheries and forests, ~~to land~~, territories, and resources they have traditionally owned, occupied or otherwise used or acquired. Their ~~livelihoods should be maintained, their~~ traditional, collective knowledge and practices should be ~~valued~~**respected**, their access to traditional food should be protected, and ~~their~~ **preservation of traditional** diets, nutrition, and wellbeing should be **a priority**~~ized~~.

Commented [USG82]: Not sure what is implied by control. Seems to suggest a top-down approach, potentially leaving out voluntary approaches or market approaches

Commented [USG83]: List leaves off a common tool government use to manage water resources.

Commented [USG84]: The rationale behind a water systems approach is similar to the rationale behind a food systems approach. Water governance has to reflect all of the water uses.

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Commented [USG85]: Covered by "diverse crops". Also, there is no objective indicator for a "biodiverse productive system"

Commented [USG86]: Unnecessary reference

Commented [USG87]: Why limit this recommendation to only landowners?

Commented [USG88]: Would smallholder farmers or smallholders be more precise? There are some inconsistencies in how small farmers are referenced within the document itself. For example, paragraph 31c lists: "Indigenous Peoples, vulnerable groups and communities, and smallholders, fisherfolks, pastoralists, landless and workers."

Commented [USG89]: Unnecessary

Commented [USG90]: Unclear what is being proposed in order to maintain their livelihoods

Commented [USG91]: This is subjective

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~~, and provide support for 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) ~~As relevant and practical~~ governmental actors should **integrate urban and peri-urban agriculture** and urban land use into national and local agricultural development strategies, food

CFS Voluntary Guidelines on Food Systems for Nutrition (VGFSyN): Draft for Negotiations
and nutrition programmes, and

²⁵ ~~HLPE-2019. Agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.~~

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

- d) Governmental and private sector actors should ~~ensure-promote~~ enabling environments to assist and ~~ensure-facilitate~~ 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 ~~enable producers to be able to use those~~ technologies/assistance/information that could improve the production, safety, and nutritional quality of crops for markets.
- e) To reduce excessive food price volatility, governmental actors should **promote market information systems** that provide timely, transparent information about food-related market transactions, with ~~more~~ emphasis on ~~nutritious-underreported 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- ~~high-yield and pest resistant varieties, (developed through conventional on-farm breeding),~~ and diverse animal-source foods and breeding (e.g. dairy products, fish, eggs, and meat), which are developed keeping smallholder and/or family farmers' livelihoods in mind.

Commented [USG92]: Packages? Do we mean services, or programs?

Commented [USG93]: Edited to focus on commodities where there currently isn't transparent market information

Commented [USG94]: If included a definition for orphan crops should be included in the footnotes

Commented [USG95]: Unclear as to why this is limited to just conventional breeding.

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 ~~and,~~ market information systems) to prevent postharvest loss and ~~ensure-support~~ smallholder farmers and small and medium-size enterprises (SMEs) ~~are able~~ to deliver diverse, perishable, ~~and~~ 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 and quality degradation** on farms, during post-harvest storage, and throughout processing, transportation, and retail (particularly ~~for~~ perishable foods such as fruits, vegetables, dairy, eggs, fish and meat). Facilitation includes training and capacity ~~on-building to improve~~ ~~improved~~ management practices and fostering ~~the~~ adoption of appropriate technologies³⁶.
- c) Governmental actors should ~~support research, development, and scaling up of~~ ~~establish~~ ~~guidance on the use of~~ **processing technologies**³⁷ that can ~~retain or~~ improve the nutrient content of food, minimize post-harvest nutrient losses, ~~create new value-added products from~~ ~~food processing by-products,~~ and promote longer-term storage of food, particularly during periods of drought, flooding, and insufficient production.
- ~~d) Governmental actors should **promote regulatory instruments and incentives to promote support and collaborate with industry on** reformulation, ~~complemented with appropriate measures such as front-of-pack labels (FOPL) and taxes to minimize~~ ~~while considering~~ ~~labelling and other mechanisms for promoting food choices consistent with national dietary guidelines, taking into account evidence on the cost-effectiveness of the policy in the context of local socio-economic and market conditions.~~ ~~the promotion of foods high in~~~~

Commented [USG96]: Recommendation is quite small if limited to guidance on use. Edited to make the recommendation more impactful.

Commented [USG97]: As previously commented, the evidence that these regulatory practices are successful in achieving desired public health outcomes is mixed.

~~value, (such as foods high in sodium, sugar, and trans and/or saturated fats), in accordance with World Trade Organization (WTO) rules.~~

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

Commented [USG98]: Why only food-based dietary guidelines?

3.2.5 Improving nutrition and health of farm and food system workers

- a) Governmental actors should **ensure that the right to decent work** is respected, protected and fulfilled for farmers and other food producers and workers (including migrants and undocumented workers); ~~Governmental actors should ensure~~ that these populations are protected and safe, and that there is no unnecessary burden or undue labour (including child ~~slavery/labour~~) 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 food system workers**, increase their access to nutritious foods associated with healthy diets in ~~or through~~ the workplace, and encourage the establishment of facilities for breastfeeding.

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Commented [USG99]: Edited to keep it in scope of the document.

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 and use of** land, natural resources, inputs, tools, information, extension and advisory services, financial services, education, training, **and** markets, and **promote their** 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. ~~Governmental actors, private sector actors, non-governmental organizations, and communities should to stimulate the transition toward sustainable food systems for the next generation.~~~~
- ~~b) also explore and incentivize the diversification of education products in services in education markets to enable rapid uptake of decent work opportunities by young people in agriculture and supporting markets, particularly among rural smallholders moving from subsistence agriculture to commercialization.~~
- c) Governmental actors and private sector actors should **promote development and access to sustainable innovation, resource hubs, and new technologies** for **male and female youth** along food supply chains that enhance **the sustainability of food systems**, nutrition and **support** social enterprises (particularly in countries experiencing high rates of **youth** internal **displacement** and external migration **among youth**).

Commented [USG100]: Unclear as to why Youth is in section 3.2 versus a different section as these recommendations for youth should not just be limited to "Sustainable food chains for improved diets and nutrition."

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Commented [USG101]: Demand side changes are also needed. Evidence has shown that supply-side investments to address skills deficits among youth vis a vis agriculture and supporting markets are not delivering the impacts needed for enough young people quickly or durably enough.

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Commented [USG102]: Unclear

Commented [USG103]: The gender divide in access to technology that must be a focus of efforts to strategically link young people to digital and other technologies to enable their contributions.

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d) Conduct research and strengthen the evidence base for effective ways to ensure young people's own nutrition and youth roles as change agents and influencers in achieving downstream nutritional impacts.

e) Governmental actors, private sector actors, non-governmental organizations, and communities should support youth addressing their own nutritional needs and strengthen the roles youth play as change agents, influencing the consumption of healthy diets within societies both as contributors in food systems and as influencers in their households and communities.

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Commented [USG104]: This idea is missing from the rest of the VGFSyN

3.3 EQUITABLE ACCESS TO HEALTHY DIETS DELIVERED BY SUSTAINABLE FOOD SYSTEMS

~~40-39.~~ Food environments comprise foods available and accessible to people in their surroundings or through online markets and the nutritional quality, safety, price, convenience, labelling and promotion of these foods. These environments should ensure provide that people have with equitable access to sufficient, safe and nutritious foods

Commented [USG105]: A simpler title makes the document more readable and compelling. Sustainable food systems is clearly implied and does not need to be repeated in the title.

Commented [USG106]: With the rise of online shopping and delivery, consumers are no longer restricted to the brick and mortar stores and restaurants in their immediate communities.

Commented [USG107]: Verb changed to appropriately reflect the sentence subject.

that meet dietary needs and food preferences for an active and healthy life³⁸, ~~and considering~~ the various physical, social, economic, cultural, and political factors that influence that access. For many people, access to healthy diets can be problematic as they may not be available, accessible, or affordable for a variety of reasons. This section outlines the potential policy entry points to improve physical and economic access, and availability of healthy diets ~~within sustainable food systems~~ in the places where people shop, choose, and eat food.

3.3.1 Improving access to food that contributes to healthy diets

- a) ~~Governmental actors should improve the availability and access of nutritious food that contributes to healthy diets through trade and investment agreements and policies, in accordance with WTO and multilaterally agreed rules, and use such agreements to ensure the progressive realization of the right to adequate food in other countries.~~
- b)a) Governmental actors should **take equity 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 **foods that contribute to healthy diets-food, markets in accordance with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).**
- e)b) Governmental actors should **minimize physical barriers** so that people can grow, purchase, order or ~~eat otherwise access~~ diverse types of foods that contribute to healthy diets in a given food environment. This ~~can could~~ be done by ~~inter alia, facilitating internet access and innovative service delivery or~~ instituting urban planning policies that ~~encourage the establishment of economically viable~~ 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 community, school, and homes food production and gardens, where appropriate. Evidence on the cost-effectiveness of such policies in the context of local socio-economic and market conditions should be considered.~~
- e)c) 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. ~~These incentives should be accessible to retailers that follow the general hygienic practices required to be followed to make the street food safe, and reduce the concentration of vendors that sell foods high in energy density with minimal nutritional value.~~
- e)d) Governmental actors, in collaboration with consumer associations, ~~and local residents,~~ can ~~regulate and~~ **incentivize local food retailers** to increase the number, variety, and sale of nutritious foods that contribute to healthy diets. ~~This can be done by creating local food policy councils to give residents a voice in how best to improve availability, access and affordability of healthy diets in their communities.~~

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

- a) Governmental actors should **consider fiscal policies and voluntary initiatives to promote**

Commented [USG108]: This is not specific to sustainable food systems

Commented [USG109]: The United States opposes the inclusion of this language as CFS is not the appropriate venue to negotiate trade policy

Commented [USG110]: Would smallholder farmers or smallholders be more precise? There are some inconsistencies in how small farmers are addressed within the document itself. For example, paragraph 31c lists: "Indigenous Peoples, vulnerable groups and communities, and smallholders, fisherfolks, pastoralists, landless and workers."

Commented [USG111]: Unclear as to the meaning of sufficient ownership

Commented [USG112]: This recommendation is much broader than UNDRIP

Commented [USG113]: Not all physical barriers...some are legal or institutional.

Commented [USG114]: As with every policy proposal, cost-effectiveness must be evaluated at the local level. Empirical evidence from the United States on the effectiveness of policy to eliminate food deserts and food swamps, for example, shows that in most cases these policies are expensive and do not have the intended effect, particularly policies that focus on creation or elimination of physical stores/restaurants. Our edits recognize that such policies can only succeed if stores or e-commerce options are economically viable. Economic viability also provides evidence that consumers are using the stores.

Commented [USG115]: Added food hygiene. Codex has guidance on food hygiene for street vended foods.

Commented [USG116]: Increasing retailers that sell food that is basis for healthy diets would reduce relative concentration.

Commented [USG117R116]:

Commented [USG118]: Over-reach given the listing of consumer associations.

Commented [USG119]: Too prescriptive of a solution to appear in the body of the voluntary guidelines. Perhaps could be an footnote/appendix example.

Commented [USG120]: Why limit it to just fiscal policies

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~~enhance the affordability~~ of healthy diets. This includes ~~subsidies~~ ~~consumer incentives to promote~~ ~~make~~ nutritious food options ~~to ensure they are more~~ affordable and competitively ~~priced~~ 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~~ ~~sugar, saturated fats, industrially produced trans fats, and sodium.~~

Commented [USG121]: Consumer incentives allow for a wider range of possible government actions than subsidies.

Commented [USG122]: This recommendation is unclear.

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

- b) Governmental actors should **strengthen public procurement systems** by ensuring healthy diets, in line with national dietary guidelines, are available and convenient in public settings and institutions such as kindergartens, ~~and~~ other childcare facilities, schools, hospitals, foodbanks, ~~workplaces~~, government offices, ~~military bases~~, and prisons. ~~in line with national food-based dietary guidelines~~. Policymakers should consider **promoting school meals with food procured from local, smallholder and/or family farmers or food grown in school gardens**.
- e) ~~Governmental actors should link the provision of healthy school meals with clear nutritional objectives, aligned with national food-based dietary guidelines and adapted to the needs of different age-groups, with special attention to the needs of adolescent girls. Policymakers and UN agencies should consider promoting home-grown school meals, where food served in schools is procured from local, smallholder and/or family farmers.~~

e)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 meals programs, other community-meal programs~~, or food supplement programmes. Where possible social protection programs should be linked to clear nutritional objectives, aligned with national dietary guidelines and adapted to the needs of different age-groups.

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

3.3.3 ~~Monitoring Encouraging~~ new connection technologies and promoting trends for healthy diets

- a) Governmental actors should understand and acknowledge the influential roles of the **internet, social media, and online marketing of foods**, and should ~~work toward monitoring and encouraging collaboratively work with~~ 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 nutritional information about food on menus (i.e. calories, product composition, and other nutritional content), avoid food waste, and adhere to food safety regulations.

3.4 FOOD SAFETY ACROSS SUSTAINABLE FOOD SYSTEMS

~~4.1.4.0~~ Food safety touches upon all parts of the food system and is critical to prevent food-borne pathogens, hazards and illnesses, as well as ~~transmission or contamination of~~ naturally occurring toxins ~~and contaminants~~, and ~~residues of pesticides and veterinary drugs, antibiotics and heavy metals~~. Food cannot be considered nutritious if it is not safe, and poor food safety hinders the adoption of healthy diets. There is an increased urgency to improve the ability to track food safety ~~to help monitor the food supply flow, better connect producers to consumers,~~ and facilitate food recall ~~sing and withdrawal~~ across

Commented [USG123]: Private companies often determine what is available in the workplace

Commented [USG124]: Moved this phrase in the sentence for readability.

Commented [USG125]: Not just home-grown.

Commented [USG126]: The evidence on school feeding programs shows them as effective safety net and education interventions, but the evidence on nutrition outcomes in international settings is mixed. It would be misleading to present them as nutrition interventions and that could be how they are perceived in these guidelines.

Additionally, this recommendation discusses two separate ideas: linking school meals to nutritional objectives and local procurement of school meals. This could be read to imply that local procurement supports nutritional outcomes which is not backed by evidence. The United States suggests incorporating this recommendation into 3.3.2b and d.

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Commented [USG127]: Why call out UN agencies and not other actors such as development NGOs etc?

Commented [USG128]: Not just home-grown.

Commented [USG129]: The evidence on school feeding programs shows them as effective safety net and education interventions, but the evidence on nutrition outcomes in international settings is mixed. It would be misleading to present them as nutrition interventions and that could be how they are perceived in these guidelines.

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Commented [USG130]: Too limiting.

Commented [USG131]: Unclear what the objective of monitoring is here. The goal seems to be to encourage dissemination of information about healthy diets.

Commented [USG132]: Modified to change from a top-down command perspective to a private-public partnership perspective

Commented [USG133]: This would include heavy metals. No need to separate.

Commented [USG134]: This should not focus on or be limited to antibiotic.

Commented [USG135]: Keep focus on food safety

CFS Voluntary Guidelines on Food Systems for Nutrition (VGFSyN): Draft for Negotiations coordinated networks. This section highlights the need for global and national cooperation on food safety and enhanced efforts across the food supply chain to reduce ~~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 illnesses.

Commented [USG136]: Not every stakeholder should be held responsible and accountable for sourcing, handling and quality control.

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 science-based 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~~ in developing science-based standards for nutrition and food safety and quality, Governmental actors should consider and implement, as appropriate, internationally adopted (by consensus) 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-veterinary drug~~ residues, ~~endocrine disruptors~~, chemical ~~and~~ contaminants and naturally occurring toxins, ~~unsafe~~ food additives, pathogenic bacteria, viruses, parasites, and fraud/adulteration of food products.

3.4.2 Ensuring food safety across food production systems

- a) Governmental actors and private sector actors should **consider a One Health Approach**³⁹ to food safety along the entire food and feed supply 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 participate in the development of~~ according to internationally adopted standards, relevant to World Trade Organization/Sanitary and Phytosanitary (WTO/SPS) agreements and through the Codex ad hoc Intergovernmental Task Force on Antimicrobial Resistance, and relevant standards developed by the World Organization for Animal Health (OIE). ~~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~~ support to training for food producers, handlers and preparers on the and adoption of scientifically supported, risk-based practices that can provide safe food while retaining their nutrient content.
- c) Governmental actors should understand and evaluate risks and ~~unintended consequences~~ benefits and **manage new food products** created by emerging technologies (e.g. lab grown meats, ~~and~~ gene editing, modern biotechnology products, etc.) as appropriate

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Commented [USG137]: The statement is edited as it is not clear what "national guidelines on the prudent use of AMR" means exactly. It is imperative that "medically important" be a qualifier for the other terms as non-medically important antimicrobials do not pose public health concerns and limited resources should be spent on addressing antimicrobial agents that pose public health concern.

Commented [USG138]: Reference to OIE and Codex is sufficient. This is much more specific than other recommendations in the VGFSyN.

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Commented [USG139]: Unintended consequences are included in risks. Must also consider benefits.

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depending on scientific risk assessments and taking into account Codex

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

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

Commented [USG140]: Codex standards are voluntary and not regulatory. Unaware of what would be an enforceable, "international regulatory framework."

3.5 **SOCIAL RELATIONS, KNOWLEDGE AND CULTURE OF DIETS** **HEALTHY FOOD NORMS, KNOWLEDGE, AND PRACTICES**

Commented [USG141]: Unclear what is meant by the phrase culture of diets

42-41. 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. ~~Social and behavior change interventions can shift norms around food and eating and empower people to make healthier food choices for themselves and their families. These interventions can and should cover the range from government policies to nutrition education to individual counseling to mass media campaigns, all aimed at breaking down barriers that inhibit healthy diets and encouraging healthy norms around food and eating.~~ This section outlines the policy entry points to improve access to

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

Commented [USG142]: Social Behavior Change principles and theory are absent from the introduction. Information alone does not empower actors. Edits are designed to reflect Social Behavior Change principles.

Commented [USG143]: Too vague and doesn't fit here.

Commented [USG144]: Traditional doesn't necessarily mean healthy.

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 ~~and by taking~~ into account social, cultural, scientific, economic, ecological, and environmental drivers.

~~b) Governmental actors should **develop nutrition evidence-based dietary guidelines standards and restrict marketing** (including digital marketing), promotion and sponsorships exposure, especially for children aged 18 or younger, and separately for children 0-24 months, to foods high in energy density with minimal nutrition value and sugar-sweetened beverages, in accordance with multilaterally agreed rules and national legislation, where applicable. Complementary policies should be considered to reduce the impact of marketing of foods high in energy density with minimal nutritional value to children as well as the sale of foods of high energy density with minimal nutritional value near schools.~~

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c) Governmental actors should **regulate the marketing of commercial infant formula** and other ~~complementary products breast-milk substitutes~~ to ensure proper food safety and essential nutrient composition needs for infant and young children. Labeling should be clear and discernible to allow consumers purchasing these products to identify those appropriate for the age of their infant and young child. ~~implement the International Code of Marketing of Breast-Milk Substitutes⁴⁰ and subsequent WHA resolutions.~~

Commented [USG145]: In line with the section head, focus of the recommendation should be on providing information about commercial infant formula.

d) Governmental actors should **regulate nutritional labelling and consider voluntary front-of-pack labelling (FOPL)** to ~~empower consumers to choose foods consistent with promote~~ healthy dietary patterns. The ~~FOPL labelling~~ system should be aligned with national public health and nutrition policies ~~and food regulations, dietary guidelines, and food regulations as well as and consider~~ relevant WHO guidance and Codex guidelines. ~~The FOPL system should comprise an underpinning nutrient profile model that considers the overall nutrition quality of the product~~

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~~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) ~~Governmental actors should provide incentives to for 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.

~~e)~~

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

Commented [USG146]: This is overly prescriptive. Additionally, there is not an internationally acceptable nutrient profile model or even guidance/principles at this time.

Commented [USG147]: Isn't every store a public place?

Commented [USG148]: Unnecessary addition.

Commented [USG149]: This recommendation is unclear. Is it implying that education and counseling are not coupled currently and that maternal and child nutrition programmes are not coupled?

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

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- g) Governmental actors, UN agencies, NGOs, private sector actors, and medical and health practitioners should **promote social and behavior change communication** (SBCC) and social support interventions as a way to positively influence knowledge, attitudes and social norms, and coordinate messaging on nutrition across a variety of communication channels to reach multiple levels of society (e.g. mass media campaigns).
- h) Governmental actors, intergovernmental organizations including UN agencies, preparers of food handlers, 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, and 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, private sector actors, civil society organizations, and UN agencies should use evidence-based as well as and cognitive, cultural, and plural knowledge resources as appropriate, 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, private sector actors, civil society organizations, community leaders, social workers, and health professionals should **encourage food culture** and the importance of food in cultural heritage, culinary skills and nutrition literacy among communities. This can be done through community and consumer associations and educational institutions, targeting men and women.
- c) Governmental actors should appropriately **protect and promote the knowledge that Indigenous Peoples** have with regard to local traditions and methods of producing, preparing, and preserving food that promote food safety and is proven to impart nutritional and environmental benefits.

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

- a) Universities and schools should **institute a nutrition curriculum** for all medical, nursing, and agriculture and food technology students during training.
- b) Governmental actors, civil society organizations and UN agencies should **promote culinary skills** among school-age children, adolescents and adults (including promoting communal mealtimes, socializing around food, consuming healthy diets, and reducing food waste) in a variety of settings in schools, workplaces and community centres.
- c) Governmental actors should **adopt and implement comprehensive school food and nutrition policies**, review education curricula to incorporate nutrition principles, involve communities in promoting and creating healthy food environments and healthy diets in schools, and support school health and nutrition services.
- d) Governmental actors, intergovernmental organizations, NGOs, and civil society organizations should **engage in nutrition dialogues with communities** by drawing on the sharing knowledge, experience and insights of with individuals who are not usually regarded as members of the

Commented [USG150]: Unclear what is being proposed here. How would dietary guidelines be made to align with recommendations to reduce food waste? In the US, we have included tips to reduce food waste in ChooseMyPlate.gov, the education platform for the Dietary Guidelines.

Commented [USG151]: Need definition on the term “plural knowledge resources”. Unclear as to meaning.

Commented [USG152]: This recommendation is quite general. Suggest deletion or a second sentence explaining how it could be applied.

Commented [USG153]: Specifying locations does not add anything to the recommendation – for example this would seem to exclude online information to be watched at home.

Commented [USG154]: Two-way knowledge sharing benefits all parties

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nutrition community (e.g. community and religious leaders, chefs, supermarket buyers,
influencers)

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

~~43-42.~~ 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 societies. ~~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 as well as strengthening women's~~ agency, voice and status, and challenging the power relationships and legal impediments that limit ~~equality equity~~ and choices.

Commented [USG155]: True, but doesn't fit here. This is addressed in 3.6.3b and elsewhere.

Commented [USG156]: Unclear as to what is meant here. The dictionary definition of biophysics is the branch of biology that applies the methods of physics to the study of biological structures and processes.

3.6.1 Empowering women

- a) Governmental actors should ~~pass laws that promote equitable~~ participation between of women and men in political decision-making. ~~Governmental actors should take specific measures to~~ supporting women's participation with specific attention to in rural ~~women contexts, and ensure gender equity in~~ holding leadership roles in decision making bodies – ~~such as~~ parliaments, ministries and local authorities at district and community levels – so that ~~they women~~ 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 promote~~ **adolescent girls' and women's human capital development** 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 systems entrepreneurs

- a) Governmental actors should **ensure women's equal-equitable tenure rights** and promote their equal ~~and equitable~~ 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 encouraging greater women~~ decision-making power ~~for women~~ over what they choose to produce, and how they choose to produce those crops/food. Women should be offered equal ~~and equitable~~ 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

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opportunities across food systems.

- c) Governmental actors, academia, NGOs and private sector actors should **promote and increase-facilitate access to labour and time saving technologies**⁴¹ that could help improve the livelihoods of women.
- d) Governmental actors and private sector actors should **facilitate women's equal-equitable 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-could include household and business budget training, decision-making skills development, scaling of financial services and products both accessible and relevant to women's needs, and tools to help men and women strengthen their intra-household communication.

Commented [USG157]: Breaking this sentence up into its components may increase its clarity and impact.

3.6.3 Recognizing and addressing 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 gender analyses are included in 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 receive 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 that, 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 enablingenable a legal-policy 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 parentalmaternity leave (or paternity leave), and removing workplace-related barriers to breastfeeding (lack of breaks, facilities, and services).

Commented [USG158]: Edits made to make the recommendation easier to read

Commented [USG159]: Unequal labor burden broader than just unpaid care work.

Commented [USG160]: Unclear as to what is meant by "protective laws"

Commented [USG161]: Unclear as to why this caveat is necessary. It would seem to weaken the impact of the recommendation

Commented [USG162]: Overly prescriptive. Multiple ways countries can achieve paid parental leave

3.7 RESILIENT FOOD SYSTEMS IN HUMANITARIAN CONTEXTS

44.43. 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, natural disasters, and climate change, displacing millions which increases their risk of food insecurity and malnutrition. The critical focus in these contexts is identifying how to balance meeting immediate food security and nutrition needs with these broader principles, considering the timeframes that may be required for response interventions, and what impacts these may have on the food system, while also considering opportunities to protect, strengthen, or leverage the system itself. Opportunities should be sought to link interventions during humanitarian crises with longer-term strategies to strengthen the resilience of food systems. Considering the importance of

Commented [USG163]: This framing is unnecessary and would exclude natural disasters

Commented [USG164]: The key priority is addressing the immediate food security or nutrition challenge.

Commented [USG165]: This framing is unnecessary and would exclude natural disasters

Commented [USG166]: The key priority is addressing the immediate food security or nutrition challenge.

[CFS Voluntary Guidelines on Food Systems for Nutrition \(VGFSyN\): Draft for Negotiations](#) resilient food systems, this section highlights the importance of strengthening the nexus between humanitarian and development programming and builds upon the 11 principles in the CFS Framework for Action for Food Security and Nutrition in Protracted Crises (FFA)⁴².

⁴¹ These include food preservation and processing equipment, cold storage, heat and thermal processing, grinding/blending devices, energy saving stoves, and modern farm equipment for ploughing, cultivating and harvesting nutritious crops/food and raising small ruminants and poultry.

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

3.7.1 Protecting the most vulnerable to malnutrition in humanitarian contexts

- a) Governmental actors and humanitarian organizations should pay particular attention ~~to~~ protection ~~issues~~, and **facilitate access to nutritious food for and nutritional support to the** most **vulnerable and marginalized groups**.
- b) Governmental actors and parties involved in conflicts should ~~respect and protect the equal and unhindered facilitate~~ **access** of all members of affected and at-risk populations to food security and nutrition assistance, in both acute and protracted crises, ~~in accordance consistent~~ 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.

Commented [USG167]: Edits made to be consistent with international humanitarian law.

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 ~~assistance~~ 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 **fit for purpose**, of appropriate nutritional quality and quantity, **and** be safe and acceptable, ~~and not harm local markets~~. Food ~~must should~~ conform to the food standards of the host country's government ~~in line with the which should take into account~~ Codex Alimentarius standards ~~about for~~ food safety, quality, and labelling.
- c) Governmental actors and humanitarian assistance organizations should be encouraged to **purchase safe and appropriate, locally produced, fortified food when needed** ~~(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 expanded~~ coverage during times of crisis. ~~Fortification should be used only in limited times and places and~~ **Humanitarian assistance** should not disrupt local markets 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 safe and nutritious food** that is locally available and sufficient to provide a healthy diet for all stages of the lifecycle.

Commented [USG168]: Section 3.7.2 seems to conflate general food assistance and nutrition programming in humanitarian contexts, and would be well-served to better differentiate between the two. There is significant existing documentation and guidance related to best practices for both of these areas, and it feels as if this document is attempting to reinvent the wheel, while missing significant critical elements. Why not reference guidance and principles from the Food Security Cluster, Nutrition Cluster, or SPHERE standards?

Commented [USG169]: What about non-climate related disasters?

Commented [USG170]: This phrase is awkward and needs a rewrite. Unclear exactly who the recommendation is meant for

Commented [USG171]: Covered more fully in recommendation 3.7.2 c

Commented [USG172]: Codex standards are voluntary—to say that food “must” be in line with Codex recommendations may be confusing and limit aid.

Commented [USG173]: Limiting to encourage fortified foods that are only locally produced. The last sentence encourages the protection of local production competition.

Commented [USG174]: Deleted as it doesn't add anything to the recommendation. If they remain in the document, it should be clear that they are part of a clinical approach to the management of wasting.

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 **hazards**, and tampering. These early warning systems should be integrated into broader food analysis systems, **systems that 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 **and/are in** need. In particular, productive assets should be protected from severe weather and climate impacts **and other disasters** in a way that strengthens the resilience of affected populations and their ability to cope with shocks due to conflicts, **natural disasters**, and climate-related ~~disasters impacts~~. 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 where appropriate, incorporate~~ **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.

Commented [USG175]: Broader than just disasters

Commented [USG176]: Clarifier added as in some places local organization may lack the required capacity.

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

4.1 POLICY FORMULATION AND IMPLEMENTATION OF THE VGFSyN

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

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

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

dialogue, promoting coordination mechanisms, and establishing or strengthening existing, multistakeholder platforms, partnerships, processes and frameworks, such as the Scaling Up Nutrition (SUN) Movement.

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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 agencies, and other financing mechanisms development partners 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 aid in contextualizing approaches and adapting to local contexts. Governments are encouraged to use rigorous evidence-based monitoring and evaluation approaches focused on learning what works and adaptation to achieve maximum results.

Commented [USG177]: The section on monitoring is quite weak, which is a shame given the importance of the subject. We suggest this addition to emphasize the importance of evidence-based monitoring, evaluation and adaptations.

54. Donors, financing institutions and other funding-relevant entities are encouraged to apply the VGFSyN when formulating their policies for loans, grants and programmes to support both rights-beneficiaries holders' and duty-bearer implementing agencies' endeavours/efforts. The VGFSyN should can 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 and the integration of sustainable agriculture and food system dimensions into nutrition and health investment plans.

55. Development partners, technical agencies of the UN, including the Rome-based Agencies, and regional organizations are encouraged to support efforts by Governmental actors to implement the VGFSyN. Such support could include research and technical cooperation, financial assistance, the provision of evidence-based policy advice, institutional capacity development, knowledge sharing and exchange of experiences, and assistance in developing national and regional policies. Actions should could 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.

Commented [USG178]: Redundant

56. National and international research organizations, academic institutions, and universities should are invited to provide the contribute knowledge, innovation, science, and evidence on all dimensions of food systems (including citizen/consumer demand and behaviour change) to enable governmental

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actors and other food systems 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 ~~organizations that who~~ could raise awareness and organize advocacy campaigns across sectors and different ~~governmental~~ levels, and the organization of advocacy campaigns at different levels of government.

4.3 MONITORING OF THE USE AND APPLICATION OF THE VGFSyN

58. Governmental actors that choose to implement the VGFSyN, in consultation with relevant stakeholders, ~~should be encouraged to~~ **define national policy priorities and related targets indicators and establish or strengthen existing monitoring and reporting systems** in order to assess the ~~efficiency-~~ cost effectiveness of laws, policies and regulations, and implement appropriate remedial actions in case of negative impacts or gaps. Governments are encouraged to use rigorous evidence-based monitoring and evaluation approaches focused on learning what works and adaptation to achieve maximum results.

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

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

Commented [USG179]: The section on monitoring is quite weak, which is a shame given the importance of the subject. We suggest this addition to emphasize the importance of evidence-based monitoring, evaluation and adaptations.

Commented [USG180]: This should not be part of the VGFSyN. Too specific and will soon be dated and irrelevant.

Wouldn't it be more appropriate for CFS to do regular reporting out on implementation of the guidelines rather than organize a one-off global event?

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

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

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