

# **U.S. Comments**

**April 14, 2020**

## **COMMITTEE ON WORLD FOOD SECURITY**

### **Voluntary Guidelines on Food Systems for Nutrition**

#### **U.S. Statement**

The United States would like to thank the Committee on World Food Security (CFS) Open-Ended Working Group, Secretariat and the Technical Task Team for their hard work and diligence in producing Draft 1 of the Voluntary Guidelines on Food Systems for Nutrition (VGFSyN) for negotiation.

We commend the CFS for a number of improvements in the current draft as compared to the previous draft, particularly improvements to the structure and logical flow of the document. As we prepare for negotiations on the draft, we would like to mention four overarching concerns.

First, the United States believes that the recommendations could be further strengthened by additional emphasis on the need for each country to assess the cost-effectiveness of policy in the context of its own socio-economic, market and environmental conditions, using the best science and in compliance with national and international obligations. No off-the-shelf policy will work equally well in every context.

Second, the VGFSyN could be improved by more fully embracing a food systems approach. A major contribution of a food systems approach is that it considers tradeoffs and synergies among policies and programs across the entire food system. While Draft 1 provides more background on a food systems approach than the previous draft, it still fails to provide guidance on transparent, science-based assessment of policy tradeoffs, synergies and prioritization.

Third, while this draft of the VGFSyN includes more references to the internationally agreed work of other international organizations like the World Health Organization and the World Trade Organization, the current draft could be improved by additional reference to the responsibilities of these organizations and clarity about CFS' mandate in relation to them. In all cases, CFS' recommendations should align with guidance negotiated by organizations with the primary mandate. Not consistently aligning to policy recommendations or terms that are internationally agreed by member states will only cause divisiveness and make reaching consensus more difficult.

Fourth, in line with the comment above, the United States has concerns regarding the use of the VGFSyN to promote definitions or terminologies that have not been formally negotiated, or to promote definitions that contradict formally negotiated definitions. We note in particular that all references to the "right to food" should reflect the full framing laid out in the FAO Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security. We also note promotion of the term "sustainable diets," a term that does not have international acceptance. The United States is strongly opposed to the use of the term "sustainable diets." Like others, we are committed to improving the sustainability of the food we eat. It is not possible, however, to look at the composition of a diet—for example, whether it contains meat or only vegetables—to make a judgement about whether it was produced sustainably or not. All foods, including fruit, vegetables, seafood, dairy and meat, can be

produced more sustainably or less sustainably. The term “sustainable diets” is misleading because it conveys the notion that some foods are automatically produced sustainably while some are automatically produced unsustainably. Such an assumption is wrong and detrimental to the goal of more sustainable food systems because it misleads consumers about how to evaluate the sustainability of their food choices and reduces incentives for producers to pursue more sustainable production practices

The United States would also like to note that the emergence of Covid-19 and the stress it is putting on food systems around the world underline the importance of sustainable, resilient food systems for food security, health and economic stability. Ensuring that the VGFSyN are relevant given Covid-19 is a challenge, in part, because we are still learning the impacts of Covid-19 on food security and nutrition. As with any evolving situation, the true impact of Covid-19 will not be known until after it’s over. However, the crisis is a tragic reminder of the importance of trade, the private sector and well-functioning markets, as well as social protection programs for the most vulnerable, including farm workers and workers across the food supply chain.

The United States also recognizes that dramatic impact that Covid-19 has had on organizations in Italy and around the world and the need for international organizations such as CFS to adjust to these impacts. However, we have a strong preference for in-person negotiations as they create a stronger platform for international dialogue and consensus. We also have concerns on whether virtual negotiations in any CFS work stream can sufficiently accommodate the interpretation and translation aspects of negotiations which are necessary for them to be inclusive.

The United States looks forward to negotiations on the VGFSyN. We continue to welcome the opportunity to contribute to guidelines that are rooted in the identification and pursuit of holistic, cost-effective, evidence-based strategies appropriate to each national and local context, and consistent with Member States’ domestic and international obligations. We look forward to providing more detailed comments when the negotiations begin.