

## WFP's Statement on the Voluntary Guidelines on Food Systems for Nutrition (VGFSyN)

### Draft for Negotiations

- 1) The World Food Programme (WFP) would like to commend the work of the CFS Secretariat in steering efforts on the preparation of the Draft for Negotiation of the Voluntary Guidelines on Food Systems for Nutrition and for working tirelessly to incorporate the multitude of comments received during the last consultation phase. In addition, we would like to particularly thank the Chair of the Open-Ended Working Group, Ms. Liliane Ortega, and express our deep gratitude for her leadership, expertise and guidance.
- 2) WFP will continue to stay engaged, joining forces with our UN sister organizations, to support the process leading up to the finalization of the Guidelines, as well as their dissemination and roll-out, at all levels. These Voluntary Guidelines represent a fundamental achievement since the HLPE Report presented at CFS44, and a unique opportunity to guide the reshaping of food systems to improve nutrition and enable healthy diets.
- 3) WFP is very pleased with the current shape of the Guidelines and commends the CFS for addressing the key role of food systems in promoting healthy diets, not only in more stable contexts, but also in contexts affected by climate-related shocks and humanitarian crises.
- 4) We have taken note of the changes made since the Draft Two of the Guidelines; while we understand these changes are the results of consultative efforts, we see an opportunity for further refining some of the text and we will stand ready to support this process during the negotiations. In particular, WFP would like to bring to your attention a few aspects that we deem would benefit from further fine-tuning.
- 5) The first point we would like to bring to your attention focuses on fortification (previously featured in paragraph 3.2.4.d, now presented in footnote number 37 on page 16). WFP believes the role of fortification should be better positioned and further strengthened in the document and should feature in the main document and not only in a footnote. With over two billion people around the world suffering from chronic deficiency of micronutrients, the role of fortification is key. In addition, we now observe an inconsistency between section 3.7, *where it is stated that fortification should only be used in limited times and places to avoid disrupting local markets and accessibility of nutritious foods*, and footnote number 37 *which is supportive of enhancing foods' nutritional value through various techniques, including through fortification*.
- 6) The second point refers to the distribution of actions across the different constituencies. WFP takes note of the efforts undertaken to finely distribute the burden of action across several actors, beyond Governments. However, in the lead up to the finalization of the document, we feel the Guidelines would benefit from further polishing the attribution of roles and responsibilities across the various constituencies, including incorporating a stronger role for UN agencies.
  - a. With this regard, we also note an inconsistency in the use of the terms UN agencies and intergovernmental organizations. For example, in Part 2, **section 2.2**, '*Nature of the voluntary guidelines and their intended users*', paragraph 30, the Guidelines list '*Intergovernmental and regional organizations, including specialized UN agencies*' as

one of the targeted actors of the Guidelines. However, in Part 3, the text sometimes refers to *Intergovernmental organizations*, other times to *Intergovernmental organizations and UN agencies*, and others solely to *UN agencies*.

- 7) In addition, **Section 3.7.2**, '*Improving the quality of food and nutrition assistance*', paragraph 'a', refers to the need to ensure that food security and nutrition assessments and analyses are undertaken throughout a crisis to inform the nutrition response. WFP believes a greater emphasis should be attributed in the document to the fundamental role played by food systems analyses that should be undertaken not only in humanitarian contexts, but rather, under all circumstances

In addition to the above-mentioned points presented during the last OEWG meeting, WFP would also kindly ask the CFS Secretariat to take note of the following remarks:

1) Part 1, 'Introduction', section 1.1, 'Background and rationale':

- a. With regards to paragraph 3, on micronutrient deficiencies, WFP would like to flag that although anaemia is the most measured among the MNDs - and is generally used as a sign of micronutrient deficiencies in general - the target groups mentioned in the paragraph ('children under the age of five years, *adolescent girls, women of childbearing age, and pregnant and lactating women*') are actually vulnerable to all micronutrient deficiencies, and not just to anaemia. In addition, we would like to suggest revisiting the following language: "susceptible to a higher risk of anaemia".
- b. With regards to paragraph 4, on overweight and obesity, we believe the paragraph should mention that people who suffered undernutrition early in life are more susceptible to develop overweight/obesity later in life.
- c. Paragraph 10, on climate change, agriculture, and nutrition interconnected, could be improved by including actual data, for example to support the following statement: "*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*".
- d. On paragraph 11, unhealthy diets, we suggest including a definition of traditional diets, since the term traditional diets can be open to various interpretations. If with traditional diets, we are referring to diets from the past 10,000 years - mainly based on agriculture - these diets can be actually low in nutritional value. Even today many poor people in rural areas - where food systems and diets are still traditional - consume a diet that is dominated by staple foods and is low in diversity (they often cannot afford to diversify their diet or may also not have physical access to markets and inputs, e.g. due to low road density).
- e. Paragraph 12, on food systems, states that "*Every food system has the capacity to be equitable and to produce healthy diets needed for optimal nutrition*". We believe that this statement is not context-specific. In fact, food systems can be equitable, only when the external factors are also in favour.

2) With regards to part 1, **section 1.2, 'key concept':**

- a. We believe the definition of '*healthy diets*' could further be strengthened by specifying what a '*diversified, balanced and safe diet*' entails in practice, in terms of food choices, as follows: "*Healthy diets should include fruit, vegetables, legumes (e.g. lentils and beans), nuts and whole grains (e.g. unprocessed maize, millet, oats, wheat and brown rice)*" (from [WHO, Healthy Diets](#)). The definition, as it stands now, focuses on the outcomes of a healthy diet (diets that meet needs and prevent malnutrition) and on what it should not contain, but says

- little about what it should contain. This might be dangerous as open to various interpretations.
- b. Similarly, the definition of '*nutritious foods*', states that nutritious foods are high in essential nutrients, but doesn't specify what the foods high in essential nutrients are. However, we note that -later in the text, in **section 3.2.3**, paragraph 'f' - the guidelines define nutritious crops as follows: "*nutritious crops, such as fruit, vegetables, nuts and seeds, legumes, biofortified crops (developed through conventional on farm breeding), and diverse animal-source food and breeding (e.g. dairy products, fish, eggs, and meat), which are developed keeping smallholder and/or family farmers' livelihoods in mind*". WFP believes that if a definition of nutritious food/crops is given in the Guidelines, it should be given in the key concept section.
- 3) With regards to part 3, **section 3.1.3**, '*Creating accountability mechanisms, monitoring and evaluation*', we feel that the text in paragraph 'b' should refer to nutritional status, rather than to nutrition, and we suggest rephrasing it as follows: "*that capture, harmonize and disaggregate data and indicators across all aspects of food systems and outcomes related to food security, diets (particularly dietary intake and dietary quality), food composition, and ~~nutrition~~ nutritional status (including the measurement of micronutrients and anthropometry) for improved policy development and accountability, and better targeting of public programmes*".
- 4) With regards to part 3.2, **section 3.2.3**, '*Promoting nutrition within agriculture and food production*':
- a. Paragraph 'b' refers to the need to '*diversify agricultural investment and incentivize all types and sizes of producers to adopt sustainable production and to produce diverse, nutritious crops and food that contribute to healthy diets*'. However, the text fails to clarify what nutritious crops are and how far off is current production and availability from what is required to provide for healthy diets. We feel this paragraph is lacking specific goals and objectives.
- b. With regards to paragraph 'd', the paragraph states that '*modern and sustainable technologies, technical assistance ... could improve the production, safety, and nutritional quality of crops for markets*'. WFP would like to highlight that the nutritional quality of the crops is inherent in the crop/food; i.e. crops should be chosen based on this, not the other way around (preserving nutritional value that's there).
- c. WFP feels that paragraph 'f' should reference to the importance of investing in R&D not only to produce nutritious crops, but also to upscale the actual production; in addition, we feel this point should be emphasized much earlier on within the section.
- 5) In **section 3.2.4**, '*Improving food storage, processing, transformation and reformulation*', paragraph 'd' discusses the importance for "*government actors to ... promote taxes to minimize the promotion of foods high in energy density with minimal nutritional value, (such as foods high in sodium, sugar, and trans and/or saturated fats), in accordance with WTO rules*". WFP feels that this point could be better placed under section 3.3.2, '*Improving the availability and affordability of food that contributes to healthy diets*' and should further be expanded to discuss more broadly the important role of regulatory approach and fiscal policy in reshaping food systems for the promotion of healthy diets.

- 6) With regards to **section 3.2.5**, '*Improving nutrition and health of farm and food system workers*', paragraph 'b':
  - a. We suggest including a reference to the affordability dimension, for example by rephrasing as follows: '*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 physically access as well as afford healthy diets and adequate health services*'.
  - b. With this regard, we note that the use of the term 'access/accessible' is not always clear in the document. We suggest replacing it with more specific terminology such as 'physical access', 'availability', 'affordability'.
  - c. Finally we would suggest to clarify whether "living wages" is a term that implies a certain level of wage or specific needs that will be met.
  
- 7) In part 3.3, **section 3.3.1**, '*Improving access to food that contributes to healthy diets*'; with regards to paragraphs 'c' and 'd', WFP feels that although the point made are extremely relevant, there are infrastructural bottlenecks that retailers selling nutritious foods might face that should be addressed in the Guidelines. These include: a) infrastructural bottlenecks, such as the difficulty in transporting and preserving fresh foods; b) bottlenecks related to the price of nutritious foods vs the price of unhealthy snacks and their affordability.
  
- 8) **Section 3.3.2**, '*Improving the availability and affordability of food that contributes to healthy diets*':
  - a. Paragraph 'a', refers to the need to consider *fiscal policies to promote the affordability of healthy diets*, including through subsidies to promote nutritious food options. Although this is a point WFP very much agrees with, it is not clear from the text whether the subsidies should be applied to producers or to the retail prices, or both.
  - b. Paragraph 'b' makes a very important point. However, making healthy diets available and convenient in public settings and institutions, in line with the nation food-based dietary guidelines, comes with a cost. WFP feels that the Guidelines should consider and address how to make the procurement of healthy diets affordable for the public procurement system.
  
- 9) With regards to section **3.3.3**, '*Monitoring new technologies and promoting trends for healthy diets*', WFP feels this could be strengthened and expanded:
  - a. The section currently focuses solely on the role of marketing of food online and on incentivizing restaurants and online outlets to offer dishes made from nutritious foods. WFP believes this section could be further strengthened by incentivize *not only* restaurants, but the food industry as a whole, to develop food products/meals/menus that are not only convenient but also nutritious, and to reformulate food products and menu to have a healthier nutrient profile – that is protective of public health.
  - b. Lastly, WFP believe this section could be broadened and include a reference to the importance of promoting desirability for healthy diets. Desirability is recognized as one of the four domains that influences consumer's behaviour - alongside availability, accessibility, and affordability - and can be influenced by a number of factors, including: a) food composition and taste; b) through marketing strategies (i.e. public campaign, TV shows, advertising); c) branding;; d) product placement.

- c. Lastly, we feel that paragraph 'b' – stating that “*restaurants should display information about food on menus (i.e. calories, product composition, and other nutritional content)*” - would be better placed under section 3.5.1, ‘*Utilizing policies and tools to provide education and information on healthy diets*’, as a stand-alone point, given its role as a tool to provide education and information on healthy diets. The point could also further delve into suggesting how and who should incentivize this practice.

10) With regards to part 3.5, section 3.5.1, ‘*Utilizing policies and tools to provide education and information on healthy diets*’, WFP feels that the section discusses the development -rather than the utilization - of policies and tools to provide education and information. As such, we feel the paragraphs in section 3.5.1 would be better placed under section 3.1.1, ‘*Promoting policy coherence by integrating nutrition into national development*’.

In addition:

- a. Paragraph ‘a’ refers to FBDG formulation. It would be good to add that FBDGs specifically aim to meet nutrient needs. Also, FBDGs for the general population need to be adapted in order to apply for young children.
- b. Paragraph ‘d’ refers to the importance of regulating nutritional labelling and consider front of packaging labelling; the paragraphs continues saying that: “*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*”. WFP feels that both the regulation of the nutritional labelling AND the complementary policies to restrict selling/marketing certain foods in public places/around school should be promoted/enforced, since they are different and equally important.
- c. In paragraph ‘f’, it is not clear what the verb coupling refers to: “*Governmental actors, UN agencies, NGOs, and medical and health practitioners should consider coupling nutrition education and counselling to populations participating in maternal and child nutrition programmes*”.
- d. In addition, still paragraph ‘f’ talks about the importance of coupling nutrition education and counselling but only in reference to ‘*populations participating in maternal and child nutrition programmes*’; however, many other cohorts within a population could benefit from setting up a framework/system for nutrition education and counselling in different settings according to the contexts (schools/health centres, hospitals, counselling centres, etc.). The target audience that could benefit from such programmes include but are not limited to: school-aged children, adolescents, adults, as well as, teachers, parents, caregivers.
- e. Further, WFP believes that these programmes could further be leveraged by providing culinary skills in addition to nutrition education. Culinary skills are currently discussed under section 3.5.3.b, ‘*Promoting “hubs” for nutrition knowledge, education and information*’.
- f. With regards to paragraph ‘g’, we would like to highlight the importance for SBCC interventions to be based on a proper strategy; this could ensure that messages are aligned, reinforced, provided frequently enough through different media channels etc.

11) In part 3.6, ‘*Gender Equality and Women’s Empowerment across food systems*’:

- a. **Section 3.6.1**, ‘*Empowering women*’, paragraph ‘a’, talks about the importance of promoting *equal participation -between women and men -in political- decision-making, so that women can be part of the process of devising solutions to malnutrition challenges they face*. We feel this paragraph is not exhaustive and should be rephrased. Women’s participation to political decision making will involve much more than finding solution to malnutrition. In addition, it

is not clear, and rather misleading, what the text means when referring to the “malnutrition challenges that they face”.

- b. In relation to the importance of leveraging the power of the private sector we feel that section **3.6.2**, ‘*Gender Equality and Women Empowerment Across Food Systems*’, paragraph ‘d’ could reference to business platforms that specifically meet the needs of women and strengthen women’s role within the private sector landscape.
- c. With regards to section **3.6.3**, ‘*Recognizing women’s nutritional status and deprivation*’, we feel that point 3.6.3.b should reference the important role women play, not only in the production of food and the preparation of nutritious meals, but also in taking care of all family members.

12) We also note a few changes with regards to **part 3.7**, ‘*Resilient Food Systems in Humanitarian Contexts*’. More specifically:

- a. In **paragraph 44**, we suggest including Epidemic/Pandemic as examples of possible humanitarian crises, to read as follows: ‘*Linking food security and nutrition interventions during humanitarian crises (man-made, ~~and~~ climate-related disasters, epidemic, pandemic)*’.
- b. In **section 3.7.1**, “*Protecting the most vulnerable to malnutrition in humanitarian contexts*” – the text refers to the importance of addressing vulnerable and marginalized groups but does not provide a definition of who these marginalized groups are. WFP suggests the re-introduction of this definition (as included in Guidelines Draft Two) as follows: “*Vulnerable and marginalized groups include pregnant and lactating women, women of reproductive age and adolescent girls, infants, children under five, people living with HIV, tuberculosis and other infectious diseases, internally displaced people, the elderly and people with disabilities*”. This could be either included in the main text or added as a footnote.
- c. In **section 3.7.2**, paragraph ‘d’, we feel the paragraph should stress the fact that IYCF policies should: a) be in line with recommendations of the *International Code of Marketing of Breast-Milk Substitutes* (available through this link: [https://www.who.int/nutrition/publications/code\\_english.pdf](https://www.who.int/nutrition/publications/code_english.pdf)); b) optimal IYCF practices should be protected, promoted and supported at all times in emergency response.

We would like to thank again the CFS and partners for all the work undertaken in the past months. WFP looks forward to continuing supporting all the next steps of this important process, including through the upcoming negotiations, providing technical assistance as needed.