

Australia's Comments on the Draft One of the Voluntary Guidelines on Food Systems and Nutrition (VGFSyN)

Overarching comments:

- Australia welcomes guidelines that increase coherence of food systems policy recommendations and we are encouraged by the emphasis on the importance of private sector contributions to sustainable food systems. We welcome CFS efforts through the VGFSyN to contribute to and complement international initiatives with a view to promoting policy coherence and welcome the alignment with outcomes of the 2018 UN High-Level Meeting non-Communicable Diseases (NCD's) and the 2019 UN High level Meeting on Universal Health Coverage (UHC).
- Australia suggests including information in the VGFSyN on open, transparent and predictable trade as helping to address food and nutrition security.
- We also recognise the need to balance a wide range of interests for Guidelines that are intended to be used globally by a wide range of stakeholders. However we caution against overly prescriptive Guidelines that are not flexible enough to be adapted to national contexts.
- Australia would like to emphasise the need for scientific evidence based recommendations in the VGFSyN, including for suggested labelling of products and suggestions on taxation initiatives where scientific evidence linking the regulation with the outcome is unclear.
- We suggest removing references to 'subsidies' for consistency with the WTO obligations and to alleviate inference to possible trade distorting measures. Similarly we would caution prescriptive guidance on taxation measures.

Specific comments:

Page 3, 11

Suggest deleting the term 'and often ultra-processed' as the term 'processed' does not dictate whether a food is nutritious or not, insert 'and' before 'convenient', and insert 'which are often high in saturated fat, salt and added sugar' after 'food and beverage,' to read:

*The enhanced interconnectedness of people and places, globalization, urbanization, and the overabundance of cheap, **and convenient** ~~and often ultra-processed~~ food and beverage, **where they are high in saturated fat, salt and added sugar**, are important determinants of shifts in consumer behaviour toward unhealthy diets.*

Page 6, 21

Suggest removing text 'issues related to'.

Page 12, 3.2.1 c)

Suggest amending to better capture broad range of sustainable practices as follows:

'... They should encourage the adoption of **sustainable** practices, including ~~agroecological approaches~~, to ensure that...'

Page 14, 3.2.6 Prioritizing climate adaptation and mitigation

a) Suggest replacing the first sentence with “States should create an enabling policy environment, consistent with WTO obligations, to build sustainable food systems that have positive productivity and environmental outcomes”.

c) Suggest changing the emphasis of the paragraph to governments’ role being to assist industry to better manage risk, building preparedness and resilience. Suggest removing reference to ‘crop and weather’ as being too prescriptive on the types of insurances that may be used.

e) Suggest deletion of language around climate-related target-setting as this is not the forum for climate change negotiations.

Page 17, 3.3.3 Making nutritious food more affordable

b) Suggest removing reference to ‘subsidies’ for consistency with the WTO obligations and to avoid recommending trade distorting measures.

d) Suggest deleting the term ‘highly-processed’ as the term ‘processed’ does not dictate whether a food is nutritious or not.

Page 17, 3.3.4 Monitoring new technologies and trends for healthy diets

c) Suggest replacing text ‘scrutinize and govern’ with ‘consider and regulate’, Suggest inserting ‘products created by emerging’ between ‘new food’ and ‘technology’. Suggest replacing ‘gene editing’ with ‘gene edited products’ to distinguish the difference between considering the technology (i.e. gene technology) vs the food product created by that technology (i.e. lab grown meats).

Page 22, 3.6.3 Making Food Systems Resilient

Suggest including reference to intentional disruptions to the food supply chain, for example, food fraud or tampering.