

**PERMANENT DELEGATION OF BRAZIL
TO THE FOOD AND AGRICULTURE ORGANIZATION
OF THE UNITED NATIONS AND RELATED
INTERNATIONAL ORGANIZATIONS**

COMMITTEE ON WORLD FOOD SECURITY (CFS)

CFS WORKSTREAM ON FOOD SYSTEMS AND NUTRITION

**Contributions of Brazil
to the Draft One**
of the Voluntary Guidelines on Food Systems and Nutrition (VGFSyN)

Rome, February 2020

INTRODUCTION

Brazil welcomes the Draft One of the VGFSyN, which shows notably improvements from the previous versions.

2. We would like to commend that the document is centered in the three dimensions of sustainability - social, economic and environmental - the consensual path agreed within the United Nations framework to achieve true sustainability, which resulted in "The Future We Want", adopted on the occasion of the United Nations Sustainable Development Conference, in Rio de Janeiro, in 2012, when the international community agreed to "mainstream sustainable development at all levels, integrating economic, social and environmental aspects and recognizing their interlinkages, so as to achieve sustainable development in all its dimensions".
3. Brazil views most positively that the right to food is a central axis of the Voluntary Guidelines we develop here. Brazil sees with satisfaction that successful national policies applied in our country have been taken into account in the development of the present voluntary guidelines, especially the guideline to develop food-based dietary national guidelines, such as the Dietary Guidelines for the Brazilian Population, published in 2014 as a Federal law¹.
4. We view the VGFSyN as an important path to encourage members towards the construction of Public Systems of Food and Nutritional Security, organized under an intersectorial structure, with action-focused programs build upon social participation, in order to improve the quality of the populations' food and the promotion of sustainable food systems for healthy diets.
5. Brazil views the VGFSyN as tools that must be compatible with national policies, based on the autonomy, specificity and sovereignty of countries in the development of policies. The guidelines we

¹ http://bvsms.saude.gov.br/bvs/publicacoes/dietary_guidelines_brazilian_population.pdf

aim must have a structuring character that guarantees the sustainability of the impacts of actions, as well as being adapted to the epidemiological, historical and cultural realities of the populations.

6. We would like to make these additional specific proposals, aiming at improving the Voluntary Guidelines:

PART 2, ITEM 2.1

7. In **paragraph 30**, despite the fact that the wording of Version 1 of the document has incorporated Brazilian proposals made to version zero, we consider that it would still be necessary to improve the text. Taking into account the document prepared by the World Health Organization (WHO) and the FAO, entitled "Sustainable Healthy Diets - Guiding principles" (Rome, 2019), we support that the VGFSyN take into account in the definition of **paragraph 30** that healthy diets should be based on fresh and minimally processed food and that the intake of processed and ultra-processed foods should be reduced. In addition, mention should be made of the fact that ultra-processed food should not be offered to children under two years of age.

8. For Brazil, an adequate and healthy diet is a basic human right that involves guaranteeing permanent and regular access, in a socially just manner, to a dietary practice appropriate to the biological and social aspects of the individual and which must be in accordance with special dietary needs; be referenced by food culture and the dimensions of gender, race and ethnicity; accessible from a physical and financial point of view; harmonic in quantity and quality, in accordance with the principles of variety, balance, moderation and pleasure and based on adequate and sustainable production practices.

PART 2, ITEM 2.2

9. With respect to **paragraph 34.a**, it would be important to highlight the need for scientific evidence among the guiding principles. Thus, it is proposed to include "AND SCIENCE" after "holistic". The proposed new wording would be:

"a) Systemic, holistic AND SCIENCE and evidence-based (...)"

10. With reference to **paragraph 34.f**, taking into account that this section contains the guiding principles of the document, it is suggested to include actions of government responsibility in relation to the protection and promotion of adequate and healthy diets, considering comprehensive measures that protect, promote and support the population for healthy, conscious and sustainable food choices. The inclusion of the aforementioned actions can be done through the creation of a new topic in this section or through the reformulation of **item (f)**, "Nutrition knowledge and awareness".

11. With regard to **paragraph 34.g** of the document, it is noted that the wording presented in version zero was more in line with the Brazilian definition of the Human Right to Adequate and Healthy Food than the wording currently present in version 1.

12. It is proposed that the wording of **paragraph 34.g** also encompasses the guarantee of permanent and regular access, in a socially just manner, to a dietary practice appropriate to the individual's biological and social aspects, in accordance with special dietary needs. Furthermore, it must be referenced by the food culture and the dimensions of gender, race and ethnicity, accessible from a physical and financial point of view, harmonic in quantity and quality, meeting the principles of

variety, balance, moderation and pleasure; and based on adequate and sustainable production practices.

PART 3, ITEM 3.1

13. In this item of the document, it is proposed to include a topic that addresses the role of states in relation to actions to protect and promote adequate and healthy diets, considering comprehensive measures that facilitate access to fresh and minimally processed foods, as well as measures that protect, promote and support the population towards healthy, conscious and sustainable food choices.

14. Also in this section, it would be convenient to reinforce aspects related to the management of conflicts of interest. It is necessary to ensure that nutrition actions are aligned with national policies and have a structuring character, which guarantee the sustainability of the impacts of interventions and the autonomy, specificity and sovereignty in the development of policies, as well as that these nutrition actions are appropriate to the epidemiological, historical and cultural realities of the populations.

PART 3, ITEM 3.2, SUBITEM 3.2.2

15. In **paragraph 3.2.2.d**, it would be important to mention in the text that farmers must also have access to technical assistance as a link between agricultural research and users of all technologies delivered. In this sense, the following new wording is proposed for the item:

“d) States and private sector food actors should ensure farmers and other food producers have access to seeds, modern and sustainable technologies, TECHNICAL ASSISTANCE as well as skill training (...)'”.

16. In **paragraph 3.2.2.f**, the text should highlight the need for investment in breeding programs, which are the basis for obtaining new genetic materials of animal and plant origin. The following new wording is proposed:

“f) (...) conventional on farm breeding and are sustainable for smallholders. INVESTMENTS MUST BE MADE, PARTICULARLY IN ANIMAL AND PLANT BREEDING PROGRAMS, WHICH ARE THE BASIS FOR OBTAINING NEW MATERIALS.”

17. On the topic on biofortification presented in the section, it is important to take into account the international discussions on the subject in the context of the Codex Alimentarius.

PART 3, ITEM 3.2, SUBITEM 3.2.3

18. With regard to **paragraph 3.2.3.a**, it is important to recall the importance of forming associations and cooperatives of producers, with a view to reducing the costs of implementing storage and logistics structures, which are normally large and tend to be unviable to be deployed individually.

19. In this sense, it is proposed to include the following text in **paragraph 3.2.3.a**:

“a) (...) such products at adequate prices. STATES SHOULD ALSO ENCOURAGE THE FORMATION OF ASSOCIATIONS AND COOPERATIVES SO THAT THE STORAGE AND LOGISTICS STRUCTURE CAN BE IMPLEMENTED IN GROUPS AT REDUCED COSTS. States should also invest in transportation (...)”

20. With respect to **items (d) and (f)**, which address the issue of food fortification, it is suggested to align the item with the document “Sustainable Healthy Diets”, prepared by FAO and WHO in 2019, as well as, in the case of Brazil, the National Food and Nutrition Policy² and the Dietary Guide for the Brazilian Population³.

21. The highlighted items address the issue of food fortification and, with that, the impulse to technologies related to the level of food processing, to the reformulation of foods to reduce levels of nutrients critical to health and to nutrition labeling.

22. In this context, based on the epidemiological scenario of different countries, strategies to promote adequate and healthy diets must be established in order to prevent and control specific nutritional deficiencies. Therefore, in addition to healthy diets, food fortification and supplementation strategies and public health interventions stand out, because of their cost-effectiveness and, in the medium and long term, capacity to raise the status of micronutrients in the population at a reasonable cost.

23. Food fortification refers to the addition of micronutrients to food, applicable when food access and availability are limited and, therefore, there is no availability of nutrients at adequate levels in the diet associated with the level of nutritional deficiency of the population. It is worth highlighting the importance of micronutrient fortification to be directed to fresh and minimally processed foods, in order to promote and preserve health. Although food fortification strategies are part of the prevention and control of nutritional deficiencies, the choice of the fortification vehicle is very important in order not to increase exposure to other health risks. Thus, it is not desirable to fortify foods that are associated with chronic diseases.

24. With regard to the food reformulation aimed at reducing the levels of nutrients critical to health – such as, for example, sodium, sugar and saturated fat –, it is important to highlight its relevance for promoting health and reducing the impact of modifiable risk factors related to chronic conditions and overweight. The reformulation of foods should not be adopted and understood as the main strategy for a healthy diet, be it either in the addition of macronutrients and micronutrients, or in the reduction of nutrients associated with the risk of chronic diseases.

25. As a main recommendation, it is necessary to promote the consumption of basic foods (fresh and minimally processed) that reflect the food culture of the population and to avoid the consumption of ultra-processed foods, in a manner consistent with the definition of healthy diets.

26. Regarding nutrition labeling, it is important to highlight that packaged foods should easily and clearly inform consumers about the levels of critical nutrients, such as sugar, fats and sodium, to support healthy food choices by the population.

PART 3, ITEM 3.3, SUBITEM 3.3.1

27. With regard to **item 3.3.1.e**, it is worth mentioning that the State has a role in promoting an adequate and healthy diet, considering that the consumption of ultra-processed foods is associated with negative health outcomes. In this sense, in line with Brazilian policies and programs aimed at the vulnerable population, country developed programs should reinforce the right to health and adequate food, aiming at breaking the intergenerational cycle of poverty, through investment in the development of human capital.

² http://189.28.128.100/dab/docs/portaldab/publicacoes/national_food_nutrition_policy.pdf

³ http://bvsms.saude.gov.br/bvs/publicacoes/dietary_guidelines_brazilian_population.pdf

PART 3, ITEM 3.4, SUBITEM 3.4.1

28. **Item 3.4.1.e** addresses the role of the private sector in the acceptability of nutritious foods. The item presented seems to contradict recommendations presented in other sections of the document. Considering that a healthy diet should be based on fresh and minimally processed foods and that the consumption of ultra-processed foods should be avoided, the guidelines for individuals to be at the center of knowledge, education and information in the field of nutrition should be focused for actions that support healthier food choices and improve access to healthy food.

PART 3, ITEM 3.4, SUBITEM 3.4.2

29. In **section 3.4.2**, it is suggested to include a topic related to the importance of food environments that favor healthy food choices.

PART 4

30. As the final part of the text, focused on the implementation, monitoring and application of the document, we suggest greater emphasis on the implementation of the guidelines, in order to prevent possible conflicts of interest.

31. The **Part 4** of the text could, moreover, include possible further details on possible actions to support countries in the implementation of VGFSyN, such as workshops and the elaboration of any guiding documents.

Subjects not belonging to the mandate of the FAO

32. We see with some concern proposals to address subjects which belong neither to the mandate of the FAO nor of the CFS, but rather to other international fora, also belonging to the UN System, such as the WTO, which is undergoing reform, that we expect to tackle the subject of agricultural subsidies.

33. In this sense, we understand that subsidies, a long-standing issue in other instances, as well as trade issues, are not to be imported to the FAO or the Committee on Food Security, which aim and mandate are to guarantee food security and nutrition and combatting all the forms of malnutrition.

34. Thus, references to trade and subsidies should be removed from the text: **3.1.3.b) / 3.3.1.d) / 3.3.3.a)**.