

CFS Voluntary Guidelines on Food Systems and Nutrition (VGFyN) – DRAFT ONE

Canada's input

General Comments:

- Draft One integrates various inputs from members such as stronger reference to the impact of poverty and inequality, climate change, diets and new consumption trends, inclusion of a guiding principle on governance and accountability and further references to international instruments and CFS products.
- We are pleased that Draft 1 includes inputs with regard to: Indigenous Peoples' food systems and traditional knowledge; food safety; evidence-based, data driven approaches; the inclusion of the elderly in the list of vulnerable groups; nutrition education; and advertising to children; food swamps and overabundance of food that undermines healthy eating; micronutrient supplements; and food waste.
- The discussions have been largely collaborative and fruitful to date despite some concerns from some stakeholders on some issues, such as the definition of sustainable healthy diets which will require further examination. Canada is supportive of approaches that support sustainable food systems and of dietary guidance that include sustainability considerations.
- The document, although well-written and well-organised, provides a rather long shopping list. It is not clear how feasible it will be for the guidance to be followed, particularly giving the capacity issues for some countries. By seeking to integrate so much of the input provided by stakeholders, there is a risk that users of the guidelines may have trouble prioritizing their policy entry points and activities. We recommend to focus on the more pressing issues in certain areas, rather than aiming for general approaches that are less meaningful in practice.
- One option might be to identify policies that are strongly effective, moderately effective, and not effective, using a robust methodology and following a transparent, evidence-based assessment, that could serve as a list of policy interventions for food systems and nutrition.
- Overall, the document structure is coherent and thorough from a health equity perspective - equity is well covered in terms of identifying particular populations at risk for food insecurity and malnutrition, as well as the social determinants of those inequities.
- Regarding text and language throughout the document, we will likely make specific text proposals during the actual negotiation in the near future.

Indigenous Peoples

- Canada's input in the previous stages of this process provided a number of recommendations with regard to Indigenous Peoples and Indigenous/traditional knowledge.

- The term “indigenous people” is used throughout the full document, however, it is our understanding that, when talking about Indigenous Peoples as a whole, it should be spelled with capitalized “I” and “P” as well as an “s” added to “People”. This is consistent with spelling in UNDRIP.
- We are pleased that Draft 1 includes several references (as opposed to the Zero draft which contained a single reference) to Indigenous Peoples and Indigenous and traditional knowledge, including in paras 8, 27, 34 and sections 3.1.1, 3.2.1 (f), and 3.3.1, and 3.4.1.
- **Section 3.3.1:**
 - we suggest broadening the scope of food systems to include the traditional food system.
 - we propose to add a reference to support the sustainable use of species by Indigenous peoples, either in:
 - section c): “States should **support sustainable use of species by Indigenous peoples and** take into consideration an equity lens when examining access to food environments **by ensuring that** members of historically marginalized and vulnerable communities, residents of low-income communities, indigenous people, and those living in rural areas have sufficient access to diversified food markets.”
 - Or section f): “States should facilitate access to nutritious food for poor households through vouchers, cash, food supplement programmes, and **support for sustainable use of species by Indigenous peoples**. These **initiatives** could substitute basic staple food (such as rice or wheat flour) with more nutritious food in the food basket provided to **or accessed by** poor households.”
- Despite buttressing references to international instruments, as proposed in the past, Canada recommends to include a reference to the *United Nations Declaration on the Rights of Indigenous Peoples*.

Multi-sectoral actions

- We support the references to multi-sectoral actions in Section 3.1.1 and throughout document.
- Creating appropriate engagement opportunities for all interested stakeholders is important to inform policies and regulations. Such engagement should be transparent, relevant, inclusive, and accountable.

School Meals

- We propose to add at the end of section 3.3.2.c) “and encouraging school retention”. School meal programmes provide school children with meals or snacks throughout the school day, incentivizing parents to send their children to school.

Improving nutrition and health of farm and food systems workers

- Section 3.2.5: We propose to include a specific reference actions in support of the prevention of child labour in agriculture. Child labour is mostly found in agriculture, with 108 million girls and boys engaged in child labour in farming, livestock, forestry, fishing or aquaculture. These children are often working long hours and facing occupational hazards.

Nutrition

- Section 1.1.3 (Micronutrient deficiencies): we propose to add iodine deficiency to the list of micronutrient deficiencies with a significant public health consequence – it is the world’s most prevalent, and preventable, cause of brain damage. It is a major factor in global poverty. Could read as follows:

“Micronutrient deficiencies related to the inadequate intake of iron, vitamin A, folate, vitamin D, [ADD: iodine], and zinc, affect a large proportion of the global population with serious consequences on health, wellbeing, and development”

Gender equality and women’s empowerment

- The text is significantly improved with respect to the attention provided to gender equality and women’s empowerment. Section 3.5 (Gender equity and women’s empowerment across food systems) and subsections 3.5.1 (Recognizing women’s nutritional status and deprivation), 3.5.2 (Promoting and acknowledging women as food system entrepreneurs) and 3.5.3 (empowering women across food systems) rightly emphasise the important role women play with regard to household diets, whilst also focusing on transformational change (access to tenure rights, natural resources, training, productive tools, finance, decision-making power, technologies etc.) and needs (notably regarding the transmission of malnutrition from mothers to low-birth-weight babies).
- We recommend that “gender equality” be used throughout the document rather than “gender equity”.
- We would also encourage some consistency with the inclusion of girls throughout the document. For example:
 - Guidelines Principles Page 9 (2.2.34.e): Gender equity and women’s empowerment → recommendation to include “the empowerment of women and girls”.
 - Section 3.5.1: we recommend adding adolescent girls in the heading.
 - Section 3.2.7: recommendation to include a specific reference to the unique challenges and needs faced by adolescent girls.
- We are pleased that Draft 1 includes references to the creation of the conditions for women’s engagement in shaping food systems and the importance of involving women and girls in local food and nutrition programming and decision-making.

- Paragraph 42: suggest replacing “gender relationships” with more commonly used terminology “gender relations”.
- Section 3.5.1: suggest the following changes:
 - a) States, UN agencies and NGOs should prioritize the nutritional wellbeing of adolescent girls and women and provide health and nutritional care and services through various sectors. This can be done by ensuring ~~they are central to~~ that national development strategies are driven by gender analyses, and that those who have lower nutritional status and higher levels of deprivation, particularly women and adolescent girls, are, and the recipients of social protection policies and benefits, which can break the inter-generational cycle of malnutrition.
 - Rationale: While there is international data on women and girls’ lower nutritional status and higher deprivation levels (acting as an international gender analysis on this sector), on a national level it would be best practice to base a country strategy on that country’s specific GE and nutrition context.
 - b) Acknowledging the significant time and work burden of women in the preparation of nutritious food at the household level, and their roles in agriculture and food production, States should recognize and value the importance of unpaid care work at household level through the effective implementation of protective laws, social protection programmes and other benefits.
- Section 3.5.2: suggest the following changes
 - b) States should enhance women’s roles in agriculture by giving women decision-making power over what is produced, why, and how. Women should be offered equal levels of 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 innovative entrepreneurial opportunities across food systems.
 - c) States should promote labour and time saving technologies for that could help improve the livelihoods of women such as 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 food.
 - Rationale: the suggested language avoids reinforcing gender stereotypes/roles and leaves slightly more room for acknowledging that it could also benefit men/boys who perhaps take on roles that are traditionally held by women/girls.
 - d) States should facilitate women’s equal access to opportunities to generate income and increase their participation in decisions on the use of household income. This would include activities such as household and business budget training, and tools to help men and women strengthen their intra-household communication and decision-making skills.
- Section 3.5.3: suggest the following changes:

- a) States should **create an enabling environment which** enhances women’s meaningful participation in partnerships, decision-making, leadership roles, and **promotes the equal equitable** sharing of benefits. A priority should be to strengthen rural women’s participation and representation at all levels of policymaking for food security and nutrition, to ensure their perspectives are equally taken into account.
 - Rationale: It makes more sense to promote the equal sharing of the benefits of development (vs the equitable sharing of this). Equity (i.e. actions/the process of getting everyone to the same starting point) leads to equality (including equal enjoyment of the benefits of development).
- c) States should enshrine laws that **promote give women and men shared equal** participation **between women and men** in political decision making ~~and equality~~, supporting women holding leadership roles in decision making bodies – parliaments, ministries and local authorities at district and community levels – so that they can be part of the process of devising solutions to the malnutrition challenges they face.

Youth

- Section 3.2.7: For clarification, we would suggest including a definition of the age range for youth in this document. We would also suggest the inclusion of children in the decision-making portion of this section.
- Section 3.4.2 k): suggest adding children and youth in addition to youth leaders and entrepreneurs. Their views should be taken into consideration on decisions impacting their lives, and on how to promote information to them.

Food Systems and Nutrition in Humanitarian Contexts

- We are pleased that Section 3.6 follow recommendations of members to highlight the importance of nutrition interventions that link humanitarian responses with longer-term strategies to strengthen the resilience of food systems and improve food security and nutrition.

Food Safety

- Draft 1 reflects calls by members to significantly reinforce references to food safety in the document. While the food safety references are stronger together in a dedicated section, it may be inappropriately situated in the Climate Change Section (3.2). Within the current structure of the document, it may be better suited for the Equitable access to Sustainable and Healthy Diets (3.3).
- Section 3.2.8 makes reference to toxins (although not to aflatoxins as previously proposed), antimicrobial resistance (AMR), and the important role of Codex Alimentarius.
- Section 3.2.8 a) We support this paragraph and believe there is a role for private industry players regarding investments in training of food handlers and risk-based practices.

- Section 3.2.8 b) Canada appreciates the principle in this paragraph, including the reference to the use of Codex standards under this section, however, we will consider the language and likely make text proposals during the actual negotiation. We suggest using consistent format throughout the Document to refer to Codex.
- Section 3.2.8 c) We are comfortable with the concept of participating in information exchange networks to manage food safety risks and emergencies. We suggest to simply indicate “exchange of information during the management of emergencies” and delete the list of issues.
- Section 3.2.8 d) Language will need to be consistent with ongoing work through the Codex ad hoc Task Force on AMR and other work/initiatives.
- Section 3.2.8 a): While the para notes the importance of food safety across the food supply chain, more explicit linkages to preventing contamination at the production stage, in relation to pollution, could be made. We suggest the following addition so it would read:
 - a) States should prioritize food safety within their food systems and consider actions concerning **[ADD: production,]** handling, preparation, storage, and distribution of food...
- Suggest adding section 3.2.8 e) given that soil and water pollution can affect food safety at the food production phase (<https://www.sciencedirect.com/science/article/pii/S0160412015000021>):

e) States should also consider implementing integrated policies addressing soil and water pollution that promote food safety, including effective chemicals and waste management practices.

Agroecology:

- Para 3.2.1: Propose following changes to reflect the range of sustainable practices that exist:
 - ‘Ensuring sustainable use and management of natural resources’ calls on States to encourage the adoption of **sustainable** practices, ~~including agroecological approaches,~~ that ensure that the biodiversity of landscapes, including forests, waters and coastal seas, other agro-ecosystems, and silvo-pastoral systems, is conserved and sustainably used.

Implementation:

- **Para 50.** There have been a number of coalitions, notably in the form of Action Networks, that have already been established to support the UN’s Decade of Action on Nutrition and care needs to be taken that these coalitions, which could be regional or global in nature, are not duplicating efforts that are underway at other fora. Is the intention for the proposed coalitions under the Voluntary Guidelines to be at the civil society level (“advocating for the establishment of policies and legislation”)?