

General comments from the European Union and its Member States on Draft One of the CFS Voluntary Guidelines on Food Systems and Nutrition (VGFSyN)

We welcome Draft One as a good starting point, with clear improvements vis-à-vis the Zero Draft and thank you for the inclusive consultation process that led to its preparation. The systematic approach to food security and nutrition that is presented in the document is much appreciated.

Furthermore, we welcome the references to AMR, food safety & quality, research & innovation, consumers' education and the improvement of procurement policies for the benefit of healthy and sustainable diets, gender equality. Last but not least we highly value the linkage being made between climate change, agriculture, health and nutrition as well as the clear backing of the Right to Food-approach. Below, please find our comments and recommendations, which seek to further improve the Voluntary Guidelines (VG):

1. What is needed to streamline Draft One?

1.1 Structure

- There is a need to streamline the document. Some paragraphs are very similar to each other (e.g. subchapter 3.2.2). Please avoid repetitions, cluster similar topics and use consistent language.
- We suggest merging Part 1 and 2 as follows: 1.1. Background and rationale, 1.2. (before 2.1) Key concepts concerning food systems and nutrition, 1.3. (before 2.2) Guiding principles for reshaping or promoting sustainable food systems, 1.4 (before 1.2) Objectives and purpose, 1.5 (before 1.3) Nature of the voluntary guidelines and their intended users.
- We would suggest the following changes to Chapter 3.2.: Starting the chapter 3.2 with section 3.2.6. The title of chapter 3.2. should not be limited to consider "food supply chains". Listing section 3.2.1 in order of priority. We would propose listing to be C-B-D-E-A-F-G. Ensure that the connection to climate change is explained for all sections of the chapter 3.2.

1.2 Content

- In general, the document provides relevant recommendations, which would benefit from further sharpening; therefore we would like to see more best practices and practical tools globally applicable, to help put these recommendations into practice included. Let's try to get a more tangible outcome by presenting a limited set of key recommendations: e. g. agricultural practices that should be promoted, how food supply chains could be organized in a given territory, tools to set up sustainable supply chains, providing information on how sustainable innovative technologies can be more accessible to low-income farmers & to fight food loss and waste.
- Responsibilities need to be addressed more precisely to levels of governance (global, regional/continental, national, sub-national local) and respective actors and members, the 3 RBAs, civil society and the private sector. In particular the latter needs to be engaged at an early stage in order to increase production and consumption of accessible adequate food for a sustainable healthy diet.
- Given the multi-sectoral relevance of food systems, all relevant stakeholders should be included during policy development and in humanitarian contexts.

- In order to evaluate the impact of the VGFSyN, all stakeholders should be encouraged to monitor the applications of these policy actions through uniform indicators of nutritional status of the population. The evaluation model and the parameters to be measured could be introduced in Part Four.
- We would like to refer to “gender equality” instead of “gender equity”.
- We consider that a nexus approach to food insecurity and malnutrition in crisis context is critical and coherent humanitarian and development approaches to food systems are therefore required.
- Reference could be made to aspects of food systems that are more sustainable and contribute positively to better nutrition. Aspects of systems that provide already good examples and are inspirational could be highlighted.
- Special attention should be given to coherence with decisions taken in other UN Bodies, that are directly related to the scope of the VG. The policy coherence should not be limited to other CFS products.
- We would appreciate to see sustainability concept as overarching principle for the food system transformation. In addition, we wish to underline the need for giving due consideration to all positive and negative impacts of the various food systems, including on the environment and on the human health. If these so-called externalities are clearly demonstrated, we will be better positioned to recommend in the Voluntary Guidelines the appropriate measures, policy incentives in support of the sustainable solutions. In this regard, it would be advisable to consider the existing scientific evidence related to the true costs of food¹.

2. What needs further explanation and to be highlighted better?

- The VG should elaborate more on the Food Systems approach with regard to its various aspects, as well as possible future changes of food systems due to digitalisation. The structure of supply chains and food systems locally should be elaborated and we would like to put more emphasis on the innovative character of food systems (e. g. requiring the creation of new business models). Last but not least, we would like diets to be a more prominent issue within the VG.
- We acknowledge both the benefits and challenges of local, regional and international trade in contributing to food security and nutrition and would highlight the need to take a balanced approach in this respect.
- We would like to feature the following more prominently
 - rural areas and poor rural communities as well as smallholder farmers and family farms. The latter are the first key actors in the transformation of food systems,
 - the role of sustainable agriculture, including agro-ecological and other innovative approaches, to support this transformation,
 - policy recommendations, tools and actions in preventing overweight and obesity worldwide.
 - the relationships and interlinkages between healthy diets and sustainable diets. There are many synergies. For example vegetables, fruits, pulses and wholegrain promote health and have also lowest greenhouse gas emissions;
 - the importance of fish and fisheries in the context of food systems and nutrition;
 - the importance of preserving biodiversity, considering the ecosystem services it provides;
 - the crucial need for more research on food systems.

¹ <http://www.fao.org/family-farming/detail/en/c/436356/>; TEEB Agrifood <http://teebweb.org/agrifood/measuring-what-matters-in-agriculture-and-food-systems/> and many others).

3. Potential policy measures and mechanisms

Potential policy measures and (financial) mechanisms should be analysed carefully and need to undergo in-depth assessment.

Any recommendations in this respect should be consistent with decisions from other *fora*, including the World Trade Organization, the World Health Organization, the World Organisation for Animal Health and the United Nations Environmental Program.
