

Food systems shape our diets by determining what is available or affordable to eat, and influence what we choose to eat. Currently these systems are not achieving their potential – to prevent hunger and promote health, for people and planet. The GAIN is dedicated to tackling the human suffering caused by malnutrition. We do this by improving the consumption of nutritious and safe food, especially by the most vulnerable. We plan to reach 1 billion people by 2022, while targeting major improvements to food systems that drive healthier eating.

GAIN welcomes the opportunity to respond to this important consultation to ensure food systems are set up to provide healthy diets for all. Please see below our comments and suggested amendments regarding draft one of the voluntary guidelines on food systems and nutrition:

GENERAL COMMENTS

GAIN welcomes the substantial changes made to the structure of the voluntary guidelines and the strengthening of several sections, including the greater emphasis of gender equality and the role of women in the food system, youth empowerment, and malnutrition in all its forms throughout the document. In addition, the GAIN supports the adaption of the sections on availability and affordability with specific reference to policies on incentivising the consumption of nutritious and safe foods.

National policy makers have multiple priorities competing for scarce resources and attention. Policy makers require a set of policies which they can implement within the food system which are known to be effective. These are often described as *no regret policies*. These policies will not transform the food system on their own, however, they can be implemented with confidence, knowing that they are likely to contribute positively to food systems. No regret policies take into consideration different national realities, capacities and levels of development, as well as different types of food systems and the many drivers impacting them. We are pleased to see the inclusion of multiple no regrets policies included in the voluntary guidelines.

SPECIFIC COMMENTS

GAIN recommends strengthening the following section with the inclusion of the necessary monitoring and surveillance by states to ensure that fortification delivers its intended impact in reducing vitamin and mineral deficiencies.

PART 3

3.2.2

d) “*States should establish guidance for the use and scale-up of processing technologies that can improve the nutritional content of food (fortification/biofortification)*”

Mandatory fortification of staples like flour, rice, cooking oil, and salt can be a sustainable and effective way to prevent vitamin and mineral deficiencies in vulnerable populations. Many countries require that staple foods be fortified with vitamins and minerals, but most low and middle-income countries don't yet have the necessary monitoring and surveillance systems in place across the food system to ensure that foods are actually fortified to the required standard. Increased investment in food quality and safety testing and enforcement can help to ensure that food fortification programs have their intended impact as well as a safer food supply overall.

GAIN recommends the inclusion of workforce nutrition policies in this section. Workplaces are unique settings for nutrition interventions: they provide repeated interaction with a captive audience, a contained environment that can be modified, and the potential for significant returns on investment, making workforce nutrition a potentially strong instrument for improving nutrition of hundreds of millions of workers and their families.

3.2.5

Improving nutrition and health of farm and food system workers

- a) States and private sector actors should ensure that those who grow the world's food, have sufficient livelihoods to ensure they too can access healthy diets for their own optimal nutritional status. This means ensuring food producers and workers are food secure, have decent wages, and can access health services.*
- b) States should ensure that right to decent work are respected, protected and fulfilled, that farmers and other food producers and workers are protected and safe, and there is no unnecessary burden or undue labour which could negatively impact their health.*

PART 4

54) The dissemination and uptake of the VGFSyN should be facilitated through the identification of "champions" that could raise awareness across sectors, and the organization of advocacy campaigns at different levels. CFS provides a forum where all relevant stakeholders can learn from the experiences of others in applying the VGFSyN and assess their continued relevance, effectiveness and impact on food security and nutrition.

GAIN is happy in principle to champion these evidence-based voluntary guidelines among its partners and stakeholders to improve food systems for healthier diets for all.

For more information, please contact:

Catrin Kissick | ckissick@gainhealth.org
Global Alliance for Improved Nutrition (GAIN)
4th Floor Watchmaker Court | 33 St John's Lane | EC1M 4BJ | London, (UK)
T: +44 20 7042 1390