

IFAD Submission

Comments on Draft One – Voluntary Guidelines on Food Systems and Nutrition¹

General comments:

We congratulate the team for the remarkable work accomplished and the quality of this Draft One. We are pleased to note that previous comments prepared and submitted by IFAD were integrated on this version of the VG. We recognise that further adjustments are necessary to improve the guidelines and are confident that all our concerns and related inputs – as well as the one raised by other partners – will receive the due attention.

The document is comprehensive, providing a lot of useful information regarding Food systems and nutrition in general and guidance on how to promote FSyN through its integration in various key development elements.

- Title: Since sustainability seems to be key in these guidelines, the title may want to reflect the spirit of the principles. We suggest to change it to “Voluntary Guidelines on **SUSTAINABLE** food systems and nutrition”, which is in line with section 2 on “guiding principles for shaping or promoting sustainable food systems”, stating that the “VGFSyN include a number of guiding principles that should be followed to contribute to reshaping or promoting sustainable food systems, enabling sustainable and healthy diets, improving nutrition, and promoting sustainable development”.
- Title: According to us, these guidelines should provide recommendations on how food systems can lead to improved nutrition; therefore, we would also like to suggest considering the following title: “Voluntary Guidelines on **SUSTAINABLE** food systems **FOR** nutrition”. This should help to ensure a specific focus on the interlinkages between food systems *and* nutrition .
- Although the document provides a good background in section 1.1., the logical flow is slightly mixed. e.g. paragraph 6. Discusses the causes after the impact while immediately para. 8 again start the description on the impacts of malnutrition etc. It may be useful to restructure the logical flow as follows: what is malnutrition, how does it manifest itself, what are the causes, what are multi-facet impacts – characterized at the five levels (social, economic, environmental, nutritional and health consequences),
- In part one, we welcome the consequent use of “healthy and **sustainable** diets” which allows to take on a holistic and systemic food system approach and to strengthen the link between the consumption *and* production of food. However, under section 1.2 Objectives and Purpose the reference to sustainability could still be strengthened.
- The document has emphasized repeatedly the generic nature of the guidelines, and the need to adapt them to specific national socio-economic, cultural and institutional contexts. It would be useful to mention this earlier in paragraph 18, under section 1.2, instead of para 22.
- Graphical presentation of the interlinkages of the drivers of sustainable functionality of food systems to deliver healthy diets would help to operationalize the FSyN concept, in Part 1 in

¹ Font colour **red** for the text to be added

order to set the stage for understanding of the various elements of the guidelines presented in part 3

- In part two, we welcome the inclusion of the definition of “sustainable and healthy diets”
- In Part 2, there may be need to spell out some guiding principles for applying/implementation e.g. broadly speaking to aspects like rights, gender, law, accountability etc.
- Part three is well structured and very comprehensive. The listing of measures to be taken is satisfactorily concrete and specific. Nonetheless, it could benefit from further consolidation of related sub-topics in part 3 (e.g. 3.5.2 and 3.5.3 are closely related), along with institutional and policy related aspects: governance, coordination, private sector participation and M&E; and the technical aspects, such as food production, storage, processing, markets and technologies their linkages with climate change adaptation, youth, gender and knowledge and education, etc. It could also be organized along the constituent elements of food systems i.e. food supply chains, food environments, and consumer behaviour?
- In part 3, the role of ICT tools to support nutrition knowledge, education and information sharing as well as monitoring and access to healthy food should also be included.
- Under the guiding principles, it should be considered to add “social inclusion”, in addition to gender equity and women empowerment, in order to promote the inclusion of the other vulnerable people of the societies, such as youth, people with disabilities, etc. in line with paragraph 8.
- Under section 3 *Ensuring sustainable use and management of natural resources*, a paragraph should be included on protecting the rights of peasants and other people working in rural areas, in line with the approved UN Declaration (UNDRIP, December 2018);
- The document could further benefit from highlighting the specific need for integration of Food Systems and Nutrition into the National Poverty Reduction Strategies/policy/plan, which in most developing countries they serve as the high-level policy document, which defines macroeconomic, structural, and social policies in support of growth and poverty reduction, as well as sectoral contributions; and framework for coordination and monitoring poverty reduction outcomes. Chapter 3.1.2 seem to be the right place to include this element, but could also be emphasized in Part 4.
- Section 3.2.7 on youth could be more explicit and include a specific reference for States to develop policies and tax incentives that empower youth to be engaged in sustainable food systems.
- The guidelines should consistently use “indigenous peoples” with an “s”, in line with the UN Declaration on the Rights of Indigenous Peoples (UNDRIP, 2007).
- In consideration of the definitions attributed by the UN system and the development community in general, it is more appropriate to indicate “gender equality”, not equity throughout the text.
- As a general remark, we think that the section on implementation and monitoring should be further developed and strengthened. It would be useful in particular to have a clear plan of action for the next X years on how to promote the guidelines and their use. We suggest that the monitoring part is developed as a separate section, outlining a set of key performance indicators related to adoption rate and results of such adoption.

- Guidelines have a strong focus on states and “States” to be replaced with “Governmental actors” to include actors at subnational level, on which it should also focus. The private sector and the national/supranational food safety authorities are key actors and their roles need to be further described and given more attention/importance.
- Enabling food environment: It is vital that the guiding principles make clear that the responsibility of healthy and sustainable food choices is not entirely at the individual level! The choice an individual can make (or not make) is to a large degree influenced and defined by the environment of the individual (food accessibility, affordability, availability etc.). The enabling environment, therefore, plays a key role and should be part of the guiding principles. We therefore propose an additional item i) on “enabling food environment” as part of the guiding principles.
- In part 4: it might be good to state upfront that states have the responsibility to implement and monitor VGFSyN.

Detailed comments

Para. 1 : Always refer to both food *and nutrition* security.

Para. 2: The consequences of malnutrition on individual and national income as well as world’s GDP need to be illustrated. The economic impact of malnutrition is mentioned in para. 5 but not really explained

Para. 3: Suggest to shift the sentence on anaemia to the end of the paragraph since iron is only one of the many micronutrients that make up hidden hunger.

Para. 6: Need to mention cultural barriers

Para.7: (...) negative consequences on **education**, nutrition and health

Para. 8: It could include migrants as a vulnerable sector of societies.

Para. 11. “*Overabundance of cheap, convenient and often ultra-processed food and beverage*”: We cannot generalise such a statement because in several developing countries those junk foods are not necessarily cheap and the possibility to afford them is seen as a status symbol for rich people.

Para. 13-17: Need to mention the private sector and national/supranational food authorities: their role, contribution, governing mechanisms, trends, involvement in the guidelines, etc.

Para. 13: “Fostering policy, institutional and behavioural changes among food system actors **and individuals** is key to reshaping or promoting sustainable food systems that improve”

Para. 1-17: The whole introduction about malnutrition, being a big concern/priority should also mention food safety as a major cause of illnesses from non-safe foods...

Para. 19: The reference to sustainability should be strengthened. The objective of the VGFSyN is to contribute to reshaping or promoting food systems to ensure that the food that contributes to sustainable and healthy diets is available, affordable, acceptable, safe, and of adequate quantity and quality while [**respecting planetary boundaries and**] conforming “with beliefs, culture and traditions, dietary habits, and preferences of individuals, in accordance with national and international laws and obligations”

Para. 23: Stating that “VGFSyN provide guidance to humanitarian actions” might be misleading. The message is to consider the connections between the food systems and their impact on food and nutrition security not only in development operation, but also on the emergency-development nexus.

Para. 24: There is little emphasis on promoting innovations. For example, fast food will not go away in modern times (we live fast lives, and sometime need “fast” food.. but maybe an example of an innovation could be to make fast foods healthier and accessible (that is, not expensive??).

Para. 27 point c): Civil society organizations, including those representing **women**, indigenous peoples, vulnerable groups and communities.

Para. 30: We support the definition of “sustainable and healthy diets” based on the FAO and WHO (2019) Sustainable healthy diets – guiding principles. This highlights the systemic perspective on food systems and nutrition and consider the conditions under which food is produced, processed, distributed and/or prepared. The term “sustainable and healthy diets” ensures conceptually connecting healthy diets to sustainable food production and sustainable food systems.

Para. 34: The list of guiding principles mix up “strategies”, “principles”, “concepts”, “sector of intervention”, that refer to different level of analysis. (i.e. “Nutrition knowledge and awareness” is *not* a principle, *nor* is “Capacity building”)

f) Nutrition knowledge and awareness: Furthermore, the focus should not be limited to nutrition knowledge, but rather cover knowledge and awareness on nutritious and sustainable food (or sustainable and healthy diets) more broadly.

f) ~~Nutrition~~ Knowledge and awareness [on sustainable and healthy diets]:

Para. 34 e): (...) *for women’s involvement in decision-making and strong engagement in shaping food systems that improve nutrition, given their **specific nutrition needs along their lives and reproductive cycle; an addition to** key role in care, education, health promotion and food consumption.*

Para. 35: “food systems are interconnected” – probably it should read as “the various parts that make up the food systems are interconnected”.

Para. 38 3.1.1: *a) States should facilitate an inclusive dialogue ensuring the participation of a range of stakeholders working with or in food systems, national and international organizations from civil society, **women**, indigenous peoples, the private sector, the UN, donors and national researchers. [from a food systems perspective].*

Para. 3.1.2: The title should read Promoting policy coherence by integrating nutrition into national development **agenda**.

The sentence on aligning policies that affect nutrition across sectors is very general. While this is correct, it does not specify specific strategies or areas of focus if we adopt a food system approach.

Para. 3.2.1: There could be more emphasis on Neglected and Underutilised Species and encourage their introduction in food systems.

Para. 3.2.1 f): refers to indigenous knowledge. It should be clarified if by indigenous knowledge the guidelines are referring to local, autochthonous knowledge or whether the reference is to the knowledge of indigenous peoples. If it is the latter, it should be rephrased to “indigenous peoples’ knowledge”

Para. 3.2.2: State should promote nutrition-sensitive agriculture and diversified food production through the integration of nutrition objectives into national food and agricultural policies- this is only

one step towards reaching the nutrition goals, more needs to be done to create an enabling environment for all actors, develop capacities, provide the relevant infrastructure among other strategies. Paragraph d and f are repetitive especially on the need for conventional on farm breeding

Para. 3.2.3 a. To buy such products at affordable prices and not adequate....., d. Bio fortification is not one of the processing technology e. It is important to recognise that not all countries have in place national food dietary guidelines. The set of technologies discussed is a great start, I would also recommend to state the need to build on local/indigenous technologies as well.

Suggest for Food loss and food waste to have more space especially in the context of poor small farmers.

Para. 3.2.5: A definition of the food systems workers would better help us to have a common understanding of those referred to in this section. In any case, we cannot assume that all the workers are food insecure or nutritionally vulnerable

Para. 3.2.7: The youth should be seen as drivers of innovation and not only the users. The government should therefore create an enabling environment to allow the youth to innovate and make agriculture more attractive. In empowering youth in food systems, it is crucial to sensitize and engage the youth on healthy life styles including good nutrition.

Include a specific point on young women and their specific needs. Here is a proposed text: “States should develop and implement policies and programmes to improve the nutritional status of young girls not just through better nutrition, but also via a number of multi-sectoral interventions such as education, WASH and access to resources and in particular to job opportunities to help delay marriage and pregnancy. Young and adolescent girls, especially if undernourished and stunted, are more likely to die in childbirth, be left nutritionally depleted and give birth to a malnourished child affecting their development and future productivity. Their babies are also more likely to die or be born with nutritional deficits. The infants who survive have a greater risk of growing up to be stunted mothers or fathers themselves. In order to prevent malnutrition being passed to the next generation (...)

Para. 3.3: On physical access to food, the section does not speak to own production or other means of access that are not market related, yet we know that small scale farmers mostly consume what they produce.

Para. 3.4 PEOPLE-CENTERED NUTRITION KNOWLEDGE, EDUCATION AND INFORMATION

An important aspect missing under this heading are intra-household dynamics. These are key to promote adequate nutrition knowledge and access for ALL household members, with the view of: i) help them to overcome stereotypes and negative traditional beliefs over food (e.g. women in south Asia are to eat white rice only for 40 days after birth); ii) remove gender-based biases in the distribution of available food within HH members; iii) ensure equal access of all HH members to information on nutrition and health diets (and ensure intra- hh dissemination of info); iv) ensure physical access to different HH members (e.g. availability of nutritious and health food in women’s markets etc.)

Para. 3.4.1: We should add putting in mechanism of traceability of foods along the value chains which is important especially for food safety. Some of the recommendations listed are not related to knowledge, education or information for example a) and e)

Suggest a reference to local knowledge in the case that the knowledge is within groups that are not considered as IPs? States should research on nutritious local foods and promote them. The primary goal should be solutions from within.

Para. 3.4.2: The guidelines could emphasize on responsible planning to avoid food waste especially in rich countries. Waste occurring in markets but also at household level.

Links between food loss/waste and climate change could be more explicit.

Para 3.5 GENDER EQUITY AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS, #42. Gender relationships and norms are among the most significant drivers of healthy diets. In many countries, women make decisions about the household's diet and, as primary caregivers; they have an influence on the family's nutritional status. **Women's empowerment has proven to correlate directly with the household's food security and nutrition condition, for they tend to invest additional income on better food for all household members.** Therefore, women's and girl's empowerment through education, information and access to resources and services is key to improving nutrition. Improving women's wellbeing, ensuring access to financial, technical and biophysical resources, improving agency, voice and status, and challenging the power relationships that limit choices, are promising policy entry points to empower women and ultimately, improve food security and nutrition.

We would include under 3.5 (GENDER EQUITY AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS) few additional points on the need for states and other food system actors to i) acknowledge, disseminate information about and support women's specific nutrition's needs, throughout their fertile age, menstruation period , reproductive cycle, pregnancy and breastfeeding; ii) Untangle household dynamics to ensure women and young women's access to nutritious food and information on health diets and nutrition, iii) develop and implement policies and programmes to improve the nutritional status of young girls not just through better nutrition, but also via a number of multi-sectoral interventions such as education, WASH and access to resources and in particular to job opportunities to help delay marriage and pregnancy. iv) Work together with media, private sector actors and legislators to promote realistic and healthy beauty standards, countering imagery featuring unhealthy looking models.

Para 3.5.2 d): Suggest a separate statement on tools to help men and women strengthen their intra-household communication and decision-making skills, as it is crucial to promote collaboration at household level.

3.5.3 Empowering women across food systems

a) States should enhance women's meaningful participation in partnerships, decision-making **at all levels – from the household to local and national level-** , leadership roles, and the 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.

Para 3.6.1: Food assistance: Ensure that food is used appropriately, by those who need it and the food should not end up in local markets/nearby markets and most importantly not competing with local products.

Para 3.6.3: Making food systems resilient- these recommendations would apply to all situations and not only humanitarian contexts. The guidelines could lay more emphasis on food systems that enhance people's resilience.

Para. 51: mention multi-stakeholder platforms in the sustainable food system area, not only SUN movement as a multi-stakeholder initiative from the nutrition sector.

51. Multistakeholder platforms, partnerships and frameworks and local, national and regional levels and across multiple sectors have to be established or strengthened as a key element

contributing to reshaping and promoting sustainable food systems. Particular attention has to be paid to those partnerships and platforms that are already promoting multistakeholder efforts for improved nutrition [and sustainable food systems] at country level, such as the Scaling Up Nutrition (SUN) Movement, [the One Planet (10YFP) Sustainable Food Systems (SFS) Programme and others]. Actions should be taken to improve partners' capacity to design, manage and participate in these partnerships, to ensure transparency and accountability and promote good governance as a way to ensure effective results.

Reasoning: Currently the paragraph speaks only of Nutrition and not of Food Systems. There are many multi-stakeholder platforms that are more broadly based (= food systems). ***The One Planet (10YFP) Sustainable Food Systems (SFS) Programme is a global multistakeholder initiative on sustainable food systems:*** The SFS Programme promotes policy coherence in the field of sustainable food systems, and thus including nutrition. Through the 10YFP – which has a Rio+20 mandate and has been recognized as an implementing mechanism for SDG12 (Sustainable Consumption and Production), the SFS Programme reports on a yearly basis to the High-level Political Forum on Sustainable Development. The topic of healthy and sustainable diets is of high importance and relevance in the SFS Programme; it is one of its five cross-cutting focus themes, which guide the Programme towards the achievement of its goal. The SFS Programme promotes an approach that supports diets that are healthy and that fully consider the socio-economic and environmental outcomes of food consumption.