

04 February 2020

Japan International Cooperation Agency

**Comments on
CFS Voluntary Guidelines on Food Systems and Nutrition (VGFSyN) – Draft One**

Firstly, Japan International Cooperation Agency (JICA) extends its sincere gratitude to the effort made by the Open-Ended Working Group on Nutrition led by Dr. Liliane Ortega, the Technical Task Team and the CFS Secretariat for pushing this important process forward. While JICA congratulates the enhancement made in Draft One, particularly the significantly improved structure of Part 3, JICA also wishes to propose the following modifications.

- 1) **Paragraph 36.** It is suggested to add the red-highlighted texts as follows so that the paragraph better clarifies the role of the food systems in the overall nutrition framework.

36. The VGFSyN provide policy entry points, tools, and mechanisms across the constituent elements of food systems, namely food supply chains²¹, food environments²², and consumer behaviour²³. They provide a range of actions that States, and other actors can consider to improve food systems **to supply adequate quantity of affordable and accessible source of key nutrient through balanced, healthy and sustainable diet that are linked to salient nutrition targets, particularly those set out by WHA and SDGs and eventually** to achieve better nutrition outcomes, with governments being critical in orchestrating effective enabling environments.

- 2) **Paragraph 38.** The following text, highlighted in red, is suggested in the paragraph c) under Section 3.1.3, as a fundamental element of the food-system-related information.

3.1.3 Instituting accountability mechanisms, monitoring and evaluation

- c) States should improve the availability and quality of multi-sectoral information systems that capture and harmonize food security and dietary indicators (particularly the dietary intake/consumption of food for the nutritionally vulnerable), food composition, and nutrition-related data **(particularly the balance sheet of key nutrients based on the current portfolio of commodities and processed food items vis-a-vis the aggregated demand of the population)** for improved policy development and accountability. States should ensure there is robust technical capacity to analyze food system information in a comprehensive manner to support the planning and monitoring of actions.

- 3) **Footnote 22.** Although this footnote is a quote of an HLPE document, the following

addendum is suggested in order to address both demand and supply side.

²² Food environments “refer to the physical, economic, political and socio-cultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food **as well as supply-side actors about producing, processing and distributing food.**

Above suggestions are based on the following findings and observations through activities of IFNA.

Policy cohesion between agriculture and health sectors

We fully agree with Paragraphs 14, 20 and 38 of the draft text, which call for addressing policy fragmentations of different sectors with particular reference to the one between agriculture and health sectors. Yet as we all know, coordination of these two sectors have been full of challenges and IFNA also encountered this situation at its onset. Nevertheless, our interaction with various stakeholders across all levels have found out that a fundamental cause of policy fragmentation lies in the perception gap of nutrition between the two sectors. The agriculture sector, whose traditional mandate had been the food security, captures food dominantly as the source of energy and its policy framework fits well with malnutrition problems that concern caloric intake. On the other hand, other major malnutrition issues, namely stunting, anemia and overweight, are consequences of inadequate (excessive or insufficient) consumption of specific set of nutrients, with which the agriculture policy framework has yet to fully align.

With a view to better harmonizing the two sectors towards meeting key food-related WHA Global Nutrition Targets, it is suggested the agriculture sector furnish itself with an additional policy framework so that the agriculture production is reviewed according to the supply of nutrients related to the above-mentioned targets. This policy process would make an indispensable part of the governance of the food system as described in Paragraph 38, and of the way in which the food system is reshaped as per Paragraph 40. Besides, it is believed that the cohesion of the two sectors would be further enhanced through, *inter alia*:

- 1) Take the stock of nutrient supply through the food and agriculture sector against demand (as practiced by WFP through Fill the Nutrient Gap);
- 2) Demarcate roles between the food and agriculture sector (food) and the health sector (supplement) for each key nutrient in various time horizons, noting that food would gradually, though not fully, replace supplement in the long term;
- 3) For nutrients which are addressed by the food and agriculture sector, demarcate roles among a) modification of the composition of existing commodities, b) introduction of new commodities (including bio-fortified crops), and c) food fortification in various time horizons, and;
- 4) Develop policy tools (e.g. legal and regulatory framework, fiscal arrangements) to incentivize the above (as described in Paragraph 40).

Food composition table

It is obvious that the policy process suggested above requires food composition tables of reliable quality. Moreover, food composition table is an indispensable reference to compile dietary guidelines. A few national (Kenya, Nigeria and Uganda) and sub-regional (West Africa) tables have been developed or renewed in the recent years, but they are non-existent or at best outdated in most of the other countries. An urgent action is required so that each African country has a reliable reference material.

Calling for an attention to the resource-poor subsistence farmers

Paragraph 8 and several other paragraphs in the draft rightly refer to the necessity to pay special attention to the poorest and most nutritionally vulnerable. While issues of most of them are covered by the draft, those of resource-poor subsistence farmers, or more precisely, those who source dominant part of their food from their own production or through barter and gifts, do not seem to be sufficiently captured since they have different nutrition pathways. As such, their food system is shorter and more straightforward and their decision to produce is structured not by the market but by the requirement of the household and available resources. This aspect would be especially required in the context of Sub-Sahara Africa where the poorest and most nutritionally vulnerable reside in the remote rural areas.

(end)