

Comments on Draft One of the CFS Voluntary Guidelines on Food Systems and Nutrition

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General Comments:

- There is a potential for synergy among recommendations within the VG that is not being fully realized. For example, teaching youth and children about gardening and nutrition (in addition to "culinary skills") will improve resilience and their ability to produce their own healthy food.
- There is strong potential for synergies between the VGFSyN and recommendations on agroecology. Agroecology should be identified here as the production system most capable of providing multiple benefits simultaneously: diverse healthy diets, protection from climate change (by increasing soil fertility and sequestering C), increasing resilience of fields and communities, providing adequate incomes to producers, protecting soil and above-ground biodiversity by eliminating synthetic fertilizers and pesticides.
- The VG need to make clear that fortification is not a long-term sustainable strategy, only as a short-term humanitarian aid measure. Growing diverse foods and processing them in ways that don't strip out nutrients are more sustainable measures.

Specific Comments on VGFSyN Draft One

- 2.2.g This principle should include "physical and economic access to food that is free from adverse substances, acceptable within a given culture and ensures access to future generations". (All of these points are in General Comment 12.)
- 3.2.1a Replace "States should encourage the use of ecosystem services..." with "States should protect and enhance ecosystem services ...".
- Section 3 needs to have something explicit in it about preventing land grabs (or the acquisition of lands held in common or by informal or traditional ownership rules). There's a weak reference to VGGT in 3.2.1d, but it's mainly in the context of protecting biodiversity. If farmers lose their land, they won't be able to produce food.
- 3.2.2d "States should ensure that farmers and other food producers can save seed and have access to open-pollinated and traditional varieties..." (The way this is worded now might be satisfied by access to a limited number of hybrid or GE varieties.)
- 3.2.3c – I think this point should be eliminated altogether. The private sector doesn't need to be "incentivized", especially to use technologies with uncertain impacts such as nanotechnology.
- 3.2.3d – Make sure the typo is corrected and that this says, "on-farm breeding of staples, oils, and fruits and vegetables". Also, States shouldn't just "monitor" highly-processed food but prohibit sale of ultra-processed foods (which WHO claims is a major culprit in obesity increases).
- 3.2.3e The section about adding warning labels and taxes should be separate, not part of a guideline that begins with instituting regulatory instruments to promote reformulation.

- 3.2.3f – remove “fortificants”
- 3.2.5a – Farmworkers should have access to adequate health services, period, just like they should have decent wages, and not just be “able to access them”. Their right to change their place of employment if they choose must be protected as well.
- 3.2.6a – Include “...fostering agroecology to improve crop yields and improve soil fertility while eliminating non-organic fertilizers and pesticides.”
- States should prioritize the restoration of degraded lands. This shouldn’t be left to “development partners and NGOs”.
- 3.2.6d – I don’t understand the second sentence. It seems more important to prioritize investment in diverse agroecological production systems used by small farmers.
- 3.2.6f - I don’t understand why researchers should focus on “rigorous evidence of investment along food supply chains”. Research is needed to find out where investment will improve resilience to climate change and deliver positive dietary outcomes.
- 3.2.7c – This item will be abused. I suggest leaving it out.
- 3.2.8d – This is too weak as it is. Non-therapeutic use of antimicrobials should be eliminated, not “reduced” or “phased out”.
- Section 3.3. should include cultural appropriateness of food.
- 3.3.1e – Voucher, cash or food supplement programs should allow participants to obtain nutritious prepared food also, especially if they have limited mobility or lack access to cooking facilities and clean water.
- 3.3.2c – Public procurement can obtain food from low-income farmers living near the institutions who use agroecological practices. This would provide support to small farmers as well as to consumers.
- 3.3.3b – Any grants, subsidies and non-financial support services should be contingent on use of agroecology or other sustainable farming practices.
- 3.3.4a – “Use of portable tools” --- does this mean cell-phones? This isn’t the only way to address the “digital divide”.
- 3.3.4c – This is poorly worded. Nutritional value and affordability of foods produced with “new food technologies” should be considered. Are these technologies actually helping people who are malnourished? Or are other options with known positive impacts more cost-effective?
- 3.4.2a – Perhaps this item should reiterate what sustainability means (especially since this criterion in dietary guidelines has been resisted by some countries, such as the US).
- 3.4.2e – Incentives for the placement and promotion of non-nutritious food should be eliminated.

- 3.4.3b – Replace “promote culinary skills” with “teach gardening, nutrition and culinary skills”. Culinary skills alone are not sufficient.
- 3.5.1b – Preparation and serving food for elderly, children and disabled members of the household is not the sole responsibility of women. This should have State assistance, and not rely on unpaid care work.
- 3.5.3b – Add access to reproductive health services.
- 3.6.1d – I’m wary of the “partnerships with industry” in this one. The terms should be spelled out, to avoid inequitable power relationships.
- 3.6.2c – Presumably this will include climate refugees.
- 3.6.3c – States should prioritize local procurement and use of local organizations (not just “encourage”).