

Private Sector Mechanism (PSM) Submission In Response to Draft One of the Voluntary Guidelines on Food Systems and Nutrition (VGFSyN)

February 5, 2020

In hopes of providing constructive feedback on Draft One, kindly accept the present submission on behalf the PSM. The PSM submission builds on the feedback provided to the Secretariat on the 29 January, specific suggestions for improvement of the text through a track changes document, and seven separate submissions from private sector representatives. We trust this input will be duly considered when preparing the draft to be submitted in March and remain at your disposal for any clarification on this submission.

PSM SUPPORTS DRAFT 1 OF THE VGFSYN, WHILE NOTING AREAS FOR FURTHER IMPROVEMENTS:

The PSM supports the progress made on the VGFSyN overall and commends CFS' prioritization of a robust and inclusive process to refine the guidelines. We appreciate the reframing of Draft One and the holistic approach to food systems policy recommendations, including both under and over nutrition.

The PSM notes the new structure for the document which provides for six main themes. But while it is possible to use this structure, we urge the secretariat to ensure the Guidelines are still be aligned with evidence and science-based policies as suggested by the HLPE report¹. Governments should be presented with guidelines for policies that are evidence and science based and have demonstrated to contribute to the goals set.

To the extent additional policies are also included that do not adhere to this principle, the PSM strongly urges for prioritization of those recommendations on high impact policy areas with the strongest evidence base which will provide governments with clearer guidance on policies that are effective in improving nutrition & food systems. More detail on the PSM concern for the lack of an evidence and scientific base is provided below.

We take on the comments from CFS stakeholders on 29 January that urged these guidelines to take a broader and general scope in order to allow for future developments and technologies. The PSM agrees and notes the need for greater emphasis on the role of technological advancements and innovations throughout the VGFSyN. While the

¹ High Level Panel of Experts on Food Security and Nutrition's (HLPE) Report on Nutrition and Food Systems: <http://www.fao.org/3/a-i7846e.pdf>

VGFSyN expressed support for the use of technology to contribute to sustainable food systems and healthy and sustainable diets, there was an inconsistency in the usage of technology throughout the document. We suggest greater consistency to support technological innovations overall, given their important contributions.

In sum, a “one-size-fits all” guidance approach to transform food systems is likely to be inadequate at best and destructive at worse. The policy guidelines need to be broad enough to provide governments with the opportunity to translate the guidelines in locally relevant and context specific policies.

PSM WELCOMES RECOGNITION OF THE ROLE OF PRIVATE SECTOR

While the PSM welcomes the recognition of the role of private sector contributions to supporting sustainable and healthy diets, we would like to suggest that the Secretariat consider including references to positive contributions by Private Sector in the guidelines:

- Reference can be made to industry commitments, such as food and beverage industry pledges regarding marketing to children, and availability of smaller packages.
- Reformulation and creation of completely new innovative products is another concrete way in which the private sector is delivering to assist is in improving global nutrition.

The PSM suggests the guidelines highlight the need to forge inclusive roles for the private sector in order to tap into their unique resources: scientific, technical, managerial, and other innovations driven by their research, development and investment potential.

Specifically, **Section 3.1.1** of the Guidelines could be strengthened by referring to SDG 17, which calls for a revitalized and enhanced global partnership, with multi-stakeholders, including the private sector.

This section could also provide more clarity on how both public and private partnerships can help obtain the goals of the guidelines—namely, through the specification of the many ways the private sector drives improvements and innovations across global food systems. The HLPE underscored the importance of these partnerships, describing them as a “central tool” for sustainable development.

NEED TO STRENGTHEN THE SCIENTIFIC BASIS FOR THE RECOMMENDATIONS:

The PSM suggests enhancing the scientific foundations of the VGFSyN by 1) citing the evidence used to inform all recommendations, and 2) advising how to strengthen future sustainable and healthy diets research, application and evaluation.

- The VGFSyN would benefit from greater clarity on the scientific protocols used to inform all recommendations. **Item 15 (page 4)** states that the HLPE Report, in addition to public consultations. Inconsistent citations caused two issues. First, several other sources beyond the HLPE Report were cited sporadically, which raises questions about how evidence was identified and evaluated for inclusion. Second, it is unclear how the efficacy of each recommendation was determined. For example, the guidelines recommended instituting taxes to nudge the public towards healthier purchases. Evidence from a 2017 literature review conducted by the New Zealand Institute for Economic Research shows the evidence is “inconclusive” and the link between sugar taxes and health benefits is “weak.”² Further examination of data behind taxation, as one example of a policy approach, will be useful in understanding both impact to public health and unintended consequences, especially in local contexts.
- We advise the guidelines clarify that each recommendation has evidence to support it. The guidelines could also make clear that robust, defined research and evaluation processes are needed to enact policy-based measures in-market. Ensuring the VGFSyN is evidence-based and consistent with other international guidance (Codex Alimentarius, World Trade Organization, etc.) will also support adoption and avoid unintended consequences.
- There was rightly significant focus on using evidence-based guidance and evaluation in the policymaking process, but the guidelines could offer stronger guidance on undertaking these critical processes.
 - For example, **3.4.2: Para (j)** advised updating food-based dietary guidelines (FBDG) to align policies and programmes aimed at tackling food waste. In other areas, the guidelines advised that FBDG account for “social, cultural, economic, ecological and environmental drivers.” To achieve this, policymakers will need more guidance on how to account for the trade-offs inherent with these diverse drivers.
- In terms of policy coherence, we request CFS revise recommendation **3.2.3: Para (d)** to be consistent with the political declaration of the 2017 United Nations High-level Meeting on Non-Communicable Diseases (NCDs), in which heads of state

² https://nzier.org.nz/static/media/filer_public/f4/21/f421971a-27e8-4cb0-a8fc-95bc30ceda4e/sugar_tax_report.pdf

committed to “Implement cost-effective and evidence-based interventions to halt the rise of overweight and obesity, in particular childhood obesity, taking into account World Health Organization recommendations and national priorities.”³

- The issues of food warning labels, taxes, and product formulation and reformulation are substantially more complex than can appropriately be dealt with in these subpoints. Food warning labels and taxes based on specific nutrients incorrectly imply that individual foods can be deemed “healthy” or “unhealthy,” which is not consistent with scientific evidence on the importance of overall balanced diets, nor is the recommendation in **Section 3.2.3: Para (e)** consistent with international standards. Codex is currently undertaking work on nutrition labelling, including front-of-pack labels, with which CFS recommendations should ultimately align.
- We want to reiterate that the inclusion of concepts and definitions without widespread consensus or acceptance is problematic, not only for the PSM but for all CFS stakeholders. Some examples of problematic concepts we have noted in the track changes document include terms such as ultra-processed and highly-processed. Considering that many products are developed to provide balanced, complete nutrition, these terms can lead to misunderstanding the value of food processing, so the term would be a misconception. The PSM suggests alternate language such as “nutrient poor foods,” or “low nutrient value,” so that these terms can refer to the nutrient content of foods having the same intended meaning and avoid confusion. In doing so, the risk of wrongly categorizing foods as good or bad, based on their level of processing is also avoided.

DEFINITION OF SUSTAINABLE AND HEALTHY DIETS:

PSM notes the improved Definition on Sustainable and Healthy Diets on page 8, adapted from the Food and Agriculture Organization of the United Nations (FAO) and World Health Organization’s (WHO) Sustainable Healthy Diets Guiding Principles, is a positive addition to this draft. However, the PSM also notes its translation will be highly context specific.

We also encourage the VGFSyN authors to consistently consider how all four dimensions of sustainability – as defined by the FAO to include health, economic, social, and environmental⁴– are considered throughout the guideline recommendations. For example, **item 12 (page 3)** should specify that positive outcomes are needed from a social, economic, environmental, and health perspective. This will help instill in stakeholders that sustainable food systems and sustainable and healthy diets must

³ https://www.un.org/en/ga/search/view_doc.asp?symbol=A/RES/73/2

⁴ Drewnowski A and The Ecosystem Inception Team (2018). The Chicago Consensus on Sustainable Food Systems Science. Front. Nutr. 4:74. doi: 10.3389/fnut.2017.00074

inherently account for all four dimensions. Consistently defining the four dimensions would also help stakeholders develop a more nuanced understanding and ability to account for trade-offs.

GREATER INCLUSION OF THE FARMERS' VOICE:

PSM would like to underline the important role of farmers, who should have a voice as well as the need for farms of all sizes. Greater consideration of how farmers' voices and roles is needed throughout the VGFSyN, since currently there is little focus on this essential stakeholder group. The guidelines should promote more opportunities for farmers to be engaged in program and policy formation. This will help ensure recommendations can realistically be implemented at a farm level and adapted to different contexts. It will also help address potential cost implications to the farmer.

For example, **Section 3.2.2 (b)** could be developed further to state that large and small farmers should be supported and incentivized to produce both diverse crops and livestock; currently only small farmers and crops are specified here.

FOOD SAFETY AND FOOD LOSS AND WASTE

We appreciate the various references to Food Safety and Food loss throughout the document, but the PSM believes that food safety as well as food loss and waste should have a separate heading in Draft One of the guidelines. By doing so we believe the guidelines would send a stronger message of the potential for Food Loss and Waste to impact both food security and nutrition and the sustainability of food systems, in their capacity to ensure good quality and adequate food for this and future generations.

Also, by integrating food safety policymaking with agriculture and nutrition policymaking there is the opportunity to achieve greater policy coherence to deliver safe and adequate quality food.

While the PSM appreciates and fully supports the inclusion of references to Codex Alimentarius Commission, and standards, we kindly suggest several additions and corrections which are included in the track changes document:

- Under **Section 3.2.8: para b)**: we ask that the word trade be added after “Considering the centrality of Codex Alimentarius Commission on nutrition, and food safety and trade.” Consider the two mandates of Codex: which are to ensure that food is safe and can be traded.
- States should not only implement but work towards further harmonization of food safety rules and systems.
- Under **Section 3.2.8: para c)** with reference to the wording “chemical and unsafe food additives”—The PSM would highlight that food additives which are approved

are safe to be used; therefore, we believe the text would be improved if reference were made to the use of “unsafe/unauthorized food additives”.

- Other improvements to **Section 3.2.8: para c)** are based on the technical expertise of our PSM members working closely on Food Safety issues.

With the foregoing, the PSM respectively submits its comments, the track changes document and private sector submissions for consideration by the CFS Secretariat.

Sincerely

Private Sector Mechanism