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**ALAIAB Observations on FAO Committee on World Food Security's
Voluntary Guidelines on Food Systems and Nutrition**

FAO's Committee on World Food Security (CFS) is developing **Voluntary Guidelines on Food Systems and Nutrition (VGFSyN)**. These Guidelines will be adopted at CFS' plenary meeting in October 2020 in Rome.

The Alliance of Food and Beverage Associations in Latin America (ALAIAB) is an umbrella trade alliance, comprised of 23 industry organizations¹, had proven itself a key and relevant actor in overcoming nutrition, sustainability and productive challenges-

ALAIAB supports CFS' effort to take a "systemic, holistic and evidence-based approach". Nutrition crosses all sectors and all stakeholders and interventions must be supported by strong evidence of what works and why. We are pleased that the draft Guidelines recognize the importance of private sector contributions to sustainable food systems. The food and beverage industry is committed to engaging with all actors in the food supply chain at a national, regional and global level in order to help drive change in the food systems to ensure nutrition and food security for all, and environmental sustainability for the planet.

We believe that our industry's ability to make positive contributions to the establishment of sustainable food systems will be enhanced by adopting a balanced, evidence-based, multi-stakeholder and whole of society approach. We appreciate the opportunity to provide our perspective on the draft Guidelines to CFS and encourage continued transparency and opportunities for public comment throughout the drafting process.

With the goal of assisting the development of CFS' policy framework for sustainable food systems, we offer the following set of principles for consideration in the Guideline development:

¹ **ALAIAB'S MEMBERS:** **Argentina:** Coordinadora de Productores de Alimentos (COPAL) y la Cámara de Industriales de Alimentos (CIPA); **Uruguay:** Cámara de Industriales de Alimentos (CIALI); **Paraguay:** Cámara de Empresas Paraguayas de Alimentos (CEPALI) y la Cámara de Alimentos y Bebidas de Paraguay CABE; **Chile:** Asociación de Empresas de Alimentos (Chilealimentos) y Alimentos y Bebidas de Chile (ABChile); **Brasil:** Asociación Brasileña de las Industrias de Alimentación (ABIA) y Asociación Brasileña de Bebidas Refrescantes y No Alcohólicas (ABIR); **Perú:** Asociación de la Industria de Bebidas y Refrescos no Alcohólicos (ABRESA) y Sociedad Nacional de Industriales (SNI); **Colombia:** Gremial de Alimentos y Gremial de Bebidas de la Asociación Nacional de Empresarios (ANDI-ALIMENTOS y ANDI-BEBIDAS); **Venezuela:** Cámara Venezolana de la Industria de Alimentos (CAVIDEA); **Ecuador:** Asociación Nacional de Fabricantes de Alimentos (ANFAB) y la Asociación de Industriales de Bebidas no Alcohólicas (AIBE); **Costa Rica:** Cámara Costarricense de la Industria Alimentaria (CACIA); **Guatemala:** Cámara de Industrias de Guatemala (CIG) y la Cámara Guatemalteca de Alimentos y Bebidas (CGAB); **México:** Consejo Mexicano de la Industria de Consumo Masivo (CONMEXICO) y la Asociación Mexicana de Refrescos y Aguas Carbonatadas (ANPRAC); **República Dominicana:** Asociación de Industrias de Bebidas No Alcohólicas de República Dominicana. (ASIBENAS).

I. The CFS Guidelines should align with the most recent UN nutrition and health-related Political Declarations.

ALAIAB strongly supports CFS' efforts to address the 'policy fragmentation' that is occurring between various sectors. Accordingly, it is of the most importance that the CFS Guidelines are aligned with the outcomes of the 2018 UN High-Level Meeting Non-Communicable Diseases (NCDs) and the 2019 UN High Level Meeting on Universal Health Coverage (UHC). Both the UN NCD and UHC Political Declarations reflect Member State consensus on these issues and should serve as a "roadmap" for CFS. Therefore, we believe it is important to 1) directly reference these Political Declarations in the CFS Guidelines; and 2) ensure that any policy recommendations included in the Guidelines not be policies previously considered and rejected by Member States in the UN NCD and UHC negotiations (as well other in other UN agency forums such as the WHO).

II. The CFS Guidelines should reflect well-developed, transparent and evidence-based policy recommendations that have been demonstrated to improve public health.

ALAIAB supports the inclusion of evidence-based policy recommendations in the CFS Guidelines. Guidelines with a strong scientific foundation are essential to providing Member States with recommendations that have transformative power for our food systems. However, there are multiple instances in the current draft of the Guidelines that rely on novel, untested policies:

- **Recommendations relating to ultraprocessed, processed foods and ingredients:** The Guidelines consistently refer to 'processing' both of foods and ingredients in negative terms, without providing the substantiation for doing so. Both processed foods and homemade foods can vary in their nutritional value and the term 'processed' does not dictate whether a food is healthy or not. For example, a bag of baby carrots is processed, a homemade cookie is not. Such negative connotations lacking a sound science basis are serving as the foundation for novel policy recommendations, such as "monitoring guidelines" for the processing of ingredients. In addition, the reference to so-called "**ultraprocessed**" foods (**Part 1, para. 11**) should be deleted – there is no accepted definition of "ultraprocessed:" the meaning has not been negotiated, much less agreed to, by Member States, and the term lacks scientific rigor and finds no consensus in the scientific community. Inclusion of this term was considered and rejected during UHC Political Declaration negotiations. In our view, the classification of some foods and beverages as being 'ultra-processed' has the potential to devalue the progress that agriculture and the food industry have made in

ensuring products are safe, nutritious and accessible to all. Processing can facilitate the incorporation of nutrients and food groups that are associated with positive health benefits e.g. fiber and wholegrain and in improving overall nutrient density of diets and also improve the bioavailability of some nutrients. Moreover, this terminology creates misconceptions about food processing, thereby generating unjustified alarm amongst consumers. The level of processing of a given food product is not a determinant of the food's nutrient contribution to the diet; rather, a healthy diet is determined by a combination of nutritional composition of foods, the combination of different type of foods, the amount and frequency of consumption, and overall dietary habits. The prevailing dietary advice, grounded in available scientific evidence and conveyed to consumers in various food based dietary guidelines (MyPlate (US), Eatwell Plate (UK)) portray an appropriate balance of food groups to supply optimal macro and micro nutrient intake consistent with authoritative recommendations. To ensure a sustained impact of diet on public health through reduced risk of obesity and chronic disease we must strive for evidence based advice that results in dietary patterns that encompass a wide range of safe and nutritious foods and beverages.

- **Recommendations related to “warning signs”:** ALAIAB supports science-based front of package labeling. Useful labeling efforts show the data in a neutral way, encourage manufacturers to permanent innovation in order to meet the multiple nutritional needs of the population, and help consumers make informed choices. These Guidelines go far beyond such purpose – referring to “warning signs” rather than the more appropriate term “labeling” and encouraging their use to form the basis of other regulations (restricted selling zones, advertising limitations, additional taxes). Not only is such usage not fully fleshed out in scientific literature, it is not fully fleshed out in the document.
- **Recommendation to reformulate foods and beverages to reduce sugars, salt and fats (paragraph 3.2.3.f):** We are working continually to innovate and improve the nutrition of our foods and beverages – reducing nutrients such as sugars, sodium and saturated fat; eliminating industrially produced trans-fat; and increasing palatability and consumer appeal of nutrient-dense foods considered beneficial for good health. ALAIAB suggests CFS build on the positive steps industry is taking and recommend that States encourage product innovation, the provision of relevant nutrition information to consumers, including through product labels, in accordance with the agreed CODEX Alimentarius standards, and support the update of diets that are congruous with national dietary guidelines. We also recommend that section 3, would include the recommendation of increased physical activity in children and

adolescences educational institutions. For us it is essential to take into consideration the importance of physical activity.

- **Recommendations related to zoning laws to regulate food nutrition** (Sec. 3.3.1). While this idea may have merit for scientific literature to explore, it is far too premature and untested for inclusion in an intergovernmental text, nor are zoning laws an area of FAO expertise.

III. The CFS Guidelines recognize the importance of including all stakeholders in the shift toward sustainable food systems.

ALAIAB appreciates the references in the Guidelines to the private sector as an important stakeholder in transforming food systems and believes they can be further enhanced by encouraging public-private partnerships. The Guidelines should also consider progress that has been made on key issues through industry commitments, such as food and beverage industry pledges regarding marketing to children, availability of smaller packages and innovations, and R & D departments, taking the nutritional need as the main target – all with the goal of allowing consumers to make more informed choices about their diets. Finally, we suggest that there should be a commitment by the states members to give the private sector enough time for the implementation of future labelling regulations.

ALAIAB is fully committed to increasing our engagement with governments, civil society and other stakeholders and working in collaboration to ensure the achievement of the 2030 Sustainable Development Goals of zero hunger and good health and well-being for all.



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