



Danone has been actively engaged through the Private Sector Mechanism (PSM) in drafting the Voluntary Guidelines on Food Systems and Nutrition (VGFSyN) and thanks the Committee on World Food Security (CFS) for the opportunity to submit comments on the first draft of these guidelines.

Creating a healthy and sustainable food system addressing environmental challenges is key to combat malnutrition in all its forms. Danone is convinced that only a holistic approach involving the collaboration of all stakeholders - policymakers, civil society, finance, the private sector and consumers- will allow building a healthier world for people and the planet. It will also require an innovative, scientific evidence-based approach and an integrated set of solutions across multiple sectors - agriculture, trade, health, environment, water, gender, education, finance, transportation and infrastructure.

As a leading global food company, Danone recognizes its responsibility to contribute end all forms of malnutrition and participate in creating sustainable food systems that can feed a growing global population within planet boundaries and is fully committed to do its part.

Dedicated to bringing health through food to as many people as possible, Danone is a leading global food & beverage company aiming to inspire healthier and more sustainable eating and drinking practices, in line with its vision - Danone, One Planet. One Health - which reflects a strong belief that the health of people and the health of the planet are interconnected. The company deliberately concentrate on high-growth and health-focused categories, and commit to operating in an efficient, sustainable and responsible manner.

In line with its 'One Planet. One Health' vision and to adequately respond to the challenges and opportunities of the ongoing food revolution, Danone have defined 2030 Goals aligned with the 2030 Sustainable Development Goals of the United Nations. The integrated set of 9 long-term goals covering environmental, social, health and economical aspects¹, embeds Danone's business model, brand and trust models.

These goals translate into concrete commitments related to nutritional improvements (2020 nutrition targets² and commitments³), better consumer information (especially nutrition front-of-pack labeling schemes such as NutriScore), responsible marketing especially to children practices

¹ https://www.danone.com/content/dam/danone-corp/danone-com/about-us-impact/policies-and-commitments/en/2019/Danone_Dashboard_Company_2018.pdf

² https://www.danone.com/content/dam/danone-corp/danone-com/about-us-impact/policies-and-commitments/en/2017/2017_04_NutritionalTargets2020.pdf

³ https://www.danone.com/content/dam/danone-corp/danone-com/about-us-impact/policies-and-commitments/en/2017/2017_04_NutritionCommitments.pdf

(participation in several voluntary specific pledges⁴), carbon footprint reduction (Climate policy⁵), packaging waste reduction (Packaging policy⁶), farmers long-term contracts, animal welfare, etc.

General Comments

Convinced of the interdependency of all actors across the food supply chain and the interconnections between all aspects of malnutrition, Danone appreciates the overall systemic and holistic approach the CFS has taken in the VGFSyN.

Danone also strongly supports the aim to provide a framework for sustainable food systems that promotes policy coherence and multi-stakeholder collaboration.

- For purpose of coherency, Danone encourages aligning the Voluntary Guidelines with consensus documents developed by the UN, WTO, WHO, FAO, OIE, Codex etc
- For purpose of efficiency and impact at scale, Danone strongly believes that sustainable solutions to global health and environmental challenges and achievement of the 2030 Agenda will only be created by actors from government, civil society and the private sector working together in partnership.

Finally, Danone supports the VGFSyN to take a broad and general scope and hence provide states with the opportunity to translate the guidelines in locally relevant and context specific policies, as well as to adapt the definition of Sustainable & healthy diets to their cultural specificities.

Danone also appreciates the balanced approach of CFS considering livestock and animal-based foods which represent key contributors in term of nutrition, social value and income creation.

Alike PSM, one specific concern of Danone is that the VGFSyN should be based on best practices scientifically proven to have been demonstrated to contribute to the goals listed. As mentioned below, there are several places in the draft 1 of the VGFSyN where there is lack of scientific evidence or consensus on concept and definitions for recommendations.

Specific Comments

In several instances the VGFSyN uses the expression “highly processed” foods. Danone is questioning the relevant of this concept which is not scientifically grounded. There is no scientific basis for consistently linking the degree of processing of a food product with its healthiness and no evidence to suggest it would lead consumers to choose healthier diets compared to conventional dietary guidelines based on food groups and nutrients. Food processing is effective in reducing nutrients that are negatively associated with public health risk and which may be overconsumed such as saturated fats, sugar and salt; in creating foods with improved nutrition quality; and increasing palatability and consumer appeal of nutrient-dense foods considered beneficial for good health. Processing also plays a pivotal role in ensuring food security - improving food safety and shelf-life and enabling access to affordable, convenient and nutritious products. Danone would recommend to not use the concept of “highly processed” foods in favor of a nutrition focus approach such as “less nutritious foods”, “nutrient poor food”, or “foods high in saturates, sugar and salt”, etc.

⁴ https://www.danone.com/content/dam/danone-corp/danone-com/about-us-impact/policies-and-commitments/en/2019/Danone_Pledge_On_Marketing_To_Children_2019_12.pdf

⁵ https://www.danone.com/content/dam/danone-corp/danone-com/about-us-impact/policies-and-commitments/en/2016/2016_05_18_ClimatePolicy.pdf

⁶ https://www.danone.com/content/dam/danone-corp/danone-com/about-us-impact/policies-and-commitments/en/2018/Danone_Packaging_Policy.pdf

The VGFSyN also proposes that States use regulation to promote reformulation, warning labels and taxes of “less nutritious” foods to ensure adherence to national dietary guidelines (paragraph 3.2.3.e). Danone participates in many government-led, voluntary initiatives that have led to product reformulations resulting in significant reductions added sugar in Danone products. Globally, we are supporting consumer-friendly nutrition labelling approach to give consumers easy access to the nutritional quality of the products; this can be through nutrition tables on back-of-pack (calories, sugar, sodium and other nutrients in each serving or portion and how each contributes to daily nutritional needs for a balanced, healthy diet) as well as synthetic logo on front-of-pack such NutriScore when local regulation permits. Danone suggests CFS build on the positive steps the company is taking and re-frame this paragraph to recommend that States encourage product reformulation, the provision of relevant nutrition information to consumers, including product labeling, in accordance with the agreed *CODEX Alimentarius standards* and the *WHO Guiding principles and framework manual for front-of-pack labelling for promoting healthy diets*⁷, and support the update of diets that are congruous with national dietary guidelines.

Danone supports the recommendation to reformulate foods and beverages to reduce sugars, salt and fats (paragraph 3.2.3.f). Danone is committed to providing access to safe, convenient and nutritious foods and drinks and helping consumers achieve healthy, balanced diets. The company is working continually to innovate and improve the nutrition of its offer – reducing nutrients associated with public health risk and which may be overconsumed such as sugars, sodium and saturated fat; and increasing palatability and consumer appeal of nutrient-dense foods considered protective to health. In this context, Danone suggests the CFS consider adding a recommendation to this paragraph encouraging the reformulation of products that not only *excludes* ingredients of public health concern, but also *includes* ingredients considered beneficial for good health – whole grains, fiber, fruits and vegetables and low-fat dairy.

Beyond reformulation, the role of innovation in providing the populations with safe, nutritious, convenient, and appealing food products should also be recognized.

Danone is also working to alleviate undernutrition and reduce the risk of malnutrition by fortifying products with essential micronutrients. Processing techniques, such as fortification or nutrient enhancement is widely recognized as among the most impactful and cost-effective nutrition interventions, contributing essential nutrients to help prevent deficiencies and their associated health problems in certain populations. The VGFSyN do not address the tangible health benefits to be derived from these techniques and Danone would encourages CFS to consider including a recommendation encouraging fortification or nutrient enhancement in a way that specifically answer local deficiencies, as reflected in its Policy on Micronutrients fortification⁸.

Danone recognizes the need for responsible marketing practices, especially with regards to children (paragraphs 3.4.2.b and c) and considers that pledges made by the food and beverage industry should be acknowledged. Beyond complying with IFBA’s *Global Policy on Marketing Communications to Children*, Danone has defined a specific pledge⁹ which applies in every country where Danone market its products and is aligned with the WHO *Set of Recommendations on food and non-alcoholic beverage marketing to children*¹⁰. Again, in the spirit of CFS’s intention to integrate existing

⁷ <https://www.who.int/nutrition/publications/policies/guidingprinciples-labelling-promoting-healthydiet/en/>

⁸ https://www.danone.com/content/dam/danone-corp/danone-com/about-us-impact/policies-and-commitments/en/2017/2017_09_25_DanonePolicyOnMicronutrientFortification.pdf

⁹ https://www.danone.com/content/dam/danone-corp/danone-com/about-us-impact/policies-and-commitments/en/2019/Danone_Pledge_On_Marketing_To_Children_2019_12.pdf

¹⁰ <https://www.who.int/dietphysicalactivity/publications/recsmarketing/en/>

frameworks for action, we would encourage the CFS to consider recommending that States implement the WHO *Set of Recommendations on food and non-alcoholic beverage marketing to children* by developing robust national policy frameworks that set appropriate standards with due regard to specific national circumstances.

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