



GLOBAL DAIRY PLATFORM

Global Dairy Platform (GDP) appreciates the opportunity to submit inputs for consideration by the Committee on World Food Security (CFS) in response to the call for comments on Draft One of the CFS Voluntary Guidelines on Food Systems and Nutrition (VGFSyN). GDP has remained engaged via the CFS Private Sector Mechanism throughout the drafting process, and would like to commend Dr Liliane Ortega, CFS Food Systems and Nutrition OEWG Chair as well as the CFS secretariat for the work done to-date.

GDP, a collaboration of dairy companies, associations, scientific bodies, and other global partners is committed to demonstrating dairy's positive contribution to global food systems, healthy diets, and sustainable livelihoods.

We wish to acknowledge the number of alterations and, from our perspective, improvements to the document that have been made compared to the zero draft. We recognize the complexities involved in generating a document of this nature on an issue as complex as the global food system.

Issues we believe CFS should consider for inclusion in the VGFSyN include:

- Highlight the importance of agriculture in general and the livestock sector in particular in improving the lives and health of families and communities, and creating opportunities for female empowerment globally.
- Acknowledge the need to develop measurements/metrics to assess the success or lack thereof of various programs recommended in the document (i.e., taxation; front-of-package labelling).
- Provide a clearer definition of what "evidence-based" means to the committee. While experience and cultural issues should be a part of the definition, ensuring that guidelines are science based will make them more consistent with those developed by other international organizations.
- Acknowledge that regional differences exist in global dietary needs, and no one universal diet will positively impact all people. Nutrients that are plentiful in one region (i.e., high quality protein) may be lacking in others, creating greater need, particularly in vulnerable populations.
- Acknowledge the role of the consumer in helping to drive the development and availability of healthy foods and diets. Industry and government play key roles, but companies will generally provide what consumers demand. Requesting and purchasing healthier fare can help to drive change. At the same time, educating and encouraging consumers to purchase healthy, nutrient dense foods is also important.

- Reconcile what constitutes a processed/ultraprocessed food, and how the demand for these products in some regions can stymie efforts to provide affordable, convenient, healthy fare as outlined in the document.
- Acknowledge that recommendations regarding environmental sustainability need to be science-based, and that our overall understanding of these issues is still evolving.

Additional detailed comments may be found below on the Draft One document.



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PART 1 - INTRODUCTION

1.1 BACKGROUND AND RATIONALE

1. Malnutrition in all its forms – undernutrition, micronutrient deficiencies, overweight, and obesity – has become one of the major global challenges that countries face today. Malnutrition in at least one of its forms affects every country in the world and most countries are affected by multiple forms. This represents a major impediment to achieving global food security¹, the realization of the

¹ Food security exists when all people, at all times, have physical, economic and social access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life.

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right to adequate food, and the implementation of the 2030 Agenda for Sustainable Development. The impacts of malnutrition and its various manifestations have profound consequences on people's health and wellbeing, physical and cognitive development, lives and livelihoods throughout their lifetimes and from one generation to another.

2. Malnutrition in all its forms is associated with various forms of ill health and increased levels of mortality. Undernutrition is a major cause of death among children under five while newborns with a low birth weight are more frequently affected by infectious diseases during early life and are predisposed to higher risk of contracting non-communicable diseases (NCDs). Stunting and wasting continue to represent significant challenges to achieve the 2030 goals and targets. While wasting, also known as acute malnutrition, represents a greater risk of mortality and morbidity, stunting, or chronic malnutrition is associated with delays in both physical growth and cognitive development. The coexistence of wasting and stunting, as well as stunting and obesity in children under the age of five poses major risks in some regions. Overweight and obesity are increasing in every region, with rural areas catching up to urban settings. Suggest adding a sentence or two regarding high quality protein and energy needs in regions where malnutrition/stunting are prevalent. Much is made about specific micronutrients that affect health/disease in the section below; no specific macronutrient info is provided. Protein in particular is an important nutrient to stress in this context. It has been estimated that upwards of 80% of people in India consume protein-deficient diets. Stressing the importance of high-quality protein is key to a nutritious diet.

3. Micronutrient deficiencies related to the inadequate intake of iron, vitamin A, folate, vitamin D and zinc, affect a large proportion of the global population with serious consequences on health, wellbeing, and development. Children under five, adolescent girls, women of childbearing age, and pregnant women have specific nutritional requirements across their lifecycles and are at risk of being affected by anaemia, in particular iron deficiency anaemia. Also referred to as "hidden hunger", micronutrient deficiency increases vulnerability to infection, birth defects, and impaired development, and lowers life expectancy.

4. Overweight and obesity represent major risk factors globally for diet-related NCDs such as cancer, cardiovascular disease, and diabetes, as well as chronic respiratory diseases. While undernutrition is still the main form of malnutrition among children under five, overweight and obesity are increasingly prevalent among school-aged children, adolescents and adults.

5. The social and economic impacts of malnutrition in all its forms is very high on societies as it is transmitted across generations. Malnourished mothers are more likely to have low-birth-weight babies with higher risk of becoming malnourished children and adults. The effects of malnutrition in children result in reduced stature, poor school performance, reduced economic productivity and opportunities, and increased vulnerability to NCDs and other chronic diseases. These diseases lead to higher spending on health care, putting significant burdens on national health care systems and economies. Possible addition: In various regions, agriculture/livestock ownership has lifted families from malnutrition; provided economic security; jobs/empowerment for women

6. Malnutrition in all its forms has many interrelated and underlying causes that need to be addressed simultaneously. Among them, the lack of stable access to healthy and safe diets and safe

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drinking water, inadequate infant and young child-caring and feeding practices, poor sanitation and hygiene, insufficient education and health services, and low socio-economic status.

7. Poverty and inequality are important underlying causes of hunger and malnutrition in all its forms. Economic slowdowns and downturns have significant impacts on employment rates, wages, incomes, and purchasing power with negative consequences on nutrition and health. These limit the capacity of national governments to ensure the provision of essential social services and the delivery of health care. In this context, inequality influences income and asset distribution, determines marginalization and social exclusion, and further increases the vulnerability of the most affected to malnutrition.

8. The most affected by malnutrition in all its forms typically includes those with increased nutrient requirements and those who have less control over their choice of diet, including young and school-aged children, adolescents, pregnant and lactating women, the elderly, and disabled people. In addition, urban poor, indigenous people, peasants, rural poor, agriculture and food chain workers, upland and remote communities, and displaced people are particularly vulnerable to malnutrition because of their persistent or temporary poverty.

9. Complex and protracted crises also have both immediate and long-term adverse consequences on the nutritional status of impacted populations, particularly pregnant and lactating women and children under five. Conflicts, fragility, and susceptibility to natural disasters pose a major global threat not only to the functioning of food systems and their ability to deliver sustainable and healthy diets but to the implementation of the 2030 Agenda as a whole.

10. Climate change, agriculture, poverty, and nutrition are interconnected. Climate change and variability affects temperature and precipitation, as well as the frequency and severity of extreme weather events. Increases in temperature, heat waves, and droughts impact agriculture, with the largest effects being decreased crop yields and livestock productivity, as well as declines in fisheries and agroforestry in areas already vulnerable to food insecurity. Climate change affects food quantity, quality, safety and ultimately food prices, with significant implications for availability of healthy diets.

11. Unhealthy diets represent one of the major risk factors for malnutrition and its related health outcomes. Food systems have become more interconnected from global to local levels, with longer, more complex food supply chains. The enhanced interconnectedness of people and places, globalization, urbanization, and the overabundance of cheap, convenient and often nutrient poor ~~ultra-~~ processed foods and beverages are important determinants of shifts in consumer behaviour toward unhealthy diets. Such dietary shifts have been associated with increasing prevalence of overweight, obesity and NCDs worldwide. An individual's food choices have impacts that resonate far beyond themselves: diets reflect larger systemic issues that impact population, health, sustainability, and justice.

12. Current global food systems, with their excessive consumption and waste patterns, are unsustainable. They are inefficient in resource utilization, including labor and energy, and lead to environmental degradation. Current global dietary trends are negatively impacting the world's natural resources, biodiversity, and ecosystems in the context of population growth and pressure. Food

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systems can be also characterized by inequitable power concentration and imbalances failing to deliver benefits for all. Changes are needed within and across food systems, with the aim to generate positive outcomes along the three dimensions of sustainability – social, economic, and environmental.

13. Fostering policy, institutional and behavioural changes among food system actors is key to reshaping or promoting sustainable food systems that improve nutrition and enable sustainable and healthy diets that meet the evolving dietary needs of growing populations. In order to be effective and sustainable, food system-related policies need to focus on their economic, social, environmental, nutritional and health consequences, paying special attention to the poorest and most nutritionally vulnerable, and addressing barriers they face in accessing sustainable and healthy diets.

14. New policies are required to address policy fragmentation and its subsequent negative impact on nutrition, ones that are designed and coordinated across sectors such as health, agriculture and food systems, education, environment, water, sanitation, gender, social protection, trade, employment, and finance – all of which impact nutrition outcomes.

15. The Committee on World Food Security (CFS) has undertaken a policy process to produce Voluntary Guidelines on Food Systems and Nutrition (VGFSyN). The preparation of these Guidelines is informed by the findings and scientific evidence provided in the [High Level Panel of Experts on Food Security and Nutrition's \(HLPE\)² Report on Nutrition and Food Systems](#). The preparation of the VGFSyN is also informed by a consultation process that took place between May and November 2019 which involved participation of CFS stakeholders in meetings in Rome, Ethiopia, Thailand, Hungary, Egypt, Panama, and the United States of America, as well as through an E-Consultation.

16. This policy process is taking place at the same time as a variety of organizations from different sectors are addressing malnutrition. Food systems and nutrition have received increased attention from the global community, including the United Nations (UN) and its Member States, and is recognized as an essential component of achieving the goals of the 2030 Agenda for Sustainable Development. In 2014, at the Second International Conference on Nutrition (ICN2), Members of the Food and Agriculture Organization (FAO) and the World Health Organization (WHO) committed to ending hunger and malnutrition in all its forms³. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025)⁴ and called upon FAO and WHO to lead its implementation, in collaboration with the World Food Programme (WFP), the International Fund for Agricultural

² The HLPE is the science-policy interface of CFS and provides a structured evidence base to inform CFS policy discussions drawing on existing research and knowledge, experiences, and policies at different scales and in different contexts.

³ FAO/WHO. 2014. ICN2, [Rome Declaration on Nutrition](#).

⁴ United Nations General Assembly Resolutions 70/259 available at <https://undocs.org/A/RES/70/259> and 72/306 at <https://undocs.org/A/RES/72/306> - The Work Programme of the UN Decade of Action on Nutrition is available at:

https://www.un.org/nutrition/sites/www.un.org.nutrition/files/general/pdf/mv131_rev1_undoa_wp_rev1_en.pdf

⁵ UNGA Resolutions [A/RES/73/2 "Political declaration of the third high-level meeting of the General Assembly on the prevention and control of non-communicable diseases"](#), [A/RES/73/132 "Global health and foreign policy: a healthier world through better nutrition"](#), [A/RES/73/253 "Agriculture development, food security and nutrition"](#).

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Development (IFAD), and the United Nations Children’s Fund (UNICEF), using multistakeholder platforms such as CFS. Specific attention on nutrition was given by a number of UNGA Resolutions⁵, the UN Economic and Social Council (ECOSOC)⁵, the UN Environment Assembly⁶, the World Health Assembly (WHA)⁷ and the UN Special Rapporteur on the Right to Food⁸.

17. The VGFSyN are expected to contribute to and complement these international initiatives with a view to promoting [voluntary](#) policy coherence. They will provide evidence-based guidance to help countries operationalize ICN2’s Framework for Action¹⁰ recommendations in support of the progressive realization of the right to adequate food in the context of national food security and of the right to health, and of the achievement of SDG 2⁹, with particular attention to targets 2.1¹², 2.2¹⁰ and 2.4¹¹. In addition, the VGFSyN should have an essential role in assisting countries to achieve a number of other related SDGs (SDG 1, 3, 4, 5, 6, 8, 10, 12).

1.2 OBJECTIVES AND PURPOSE

18. The VGFSyN are intended to be a reference point that provides evidence-based guidance mainly to governments, specialized institutions and other stakeholders, including international organizations, on [effective effective voluntary](#) policies, investment and institutional arrangements that will address malnutrition in all its forms from a food systems perspective. [Evidence-based may consist of a combination of factors, including science/technical discoveries, community feedback, local customs and traditions, consumer behavior data and/or farmer experiences.](#)

19. The objective of the VGFSyN is to contribute to reshaping or promoting food systems to ensure that the food that contributes to sustainable and healthy diets is available, affordable, acceptable, safe, and of adequate quantity and quality while conforming “with beliefs, culture and traditions, dietary

⁵ [Ministerial Declaration of the 2018 High-Level Political Forum on Sustainable Development](#)

⁶ [Ministerial Declaration of the 2019 United Nations Environment Assembly](#)

⁷ The World Health Assembly has endorsed the [Comprehensive implementation plan for maternal, infant and young child nutrition](#), and the [WHO Global action plan for the prevention and control of noncommunicable diseases 2013-2020](#), which delineate policy options for the prevention of malnutrition in all its forms and the promotion of healthy diets.

⁸ [A/71/282 “Interim report of the Special Rapporteur on the right to food”](#)

¹⁰ FAO/WHO. 2014. ICN2, [Framework for Action](#).

⁹ SDG 2, “End hunger, achieve food security and improved nutrition and promote sustainable agriculture”. ¹²

Target 2.1, “By 2030 end hunger and ensure access by all people, in particular the poor and people in vulnerable situations including infants, to safe, nutritious and sufficient food all year round”.

¹⁰ Target 2.2, “By 2030, end all forms of malnutrition, including achieving, by 2025, the internationally agreed targets on stunting and wasting in children under 5 years of age, and address the nutritional needs of adolescent girls, pregnant and lactating women and older persons”.

¹¹ Target 2.4, “By 2030, ensure sustainable food production systems and implement resilient agricultural practices that increase productivity and production, that help maintain ecosystems, that strengthen capacity for adaptation for climate change, extreme weather, drought, flooding and other disasters and that progressively improve land and soil quality”.

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habits, and preferences of individuals, in accordance with national and international laws and obligations”¹².

20. The VGFSyN follow a comprehensive, systemic, and evidence-based approach to addressing policy fragmentation with a special emphasis on the food, agriculture, and health sectors, while also addressing the challenges of social, environmental and economic sustainability. The VGFSyN are expected to address the complexity of food systems with the intention to promote [voluntary](#) policy coherence and foster and guide dialogue among different institutions and sectors.

21. Food systems are integrally connected with issues related to trade and investment, food safety, climate change, biodiversity and genetic resources, among others, which are all addressed in dedicated normative intergovernmental processes. Different actors dealing with these matters need to refer to, and build upon, existing international commitments, promoting coherence and addressing the current policy fragmentation, without duplicating efforts or moving beyond their mandates.

22. The VGFSyN are intended to be global in scope and to provide guidance to policy-makers and relevant stakeholders when designing context-specific policies, strategies, plans and programmes. They take into consideration different national realities, capacities and levels of development, as well as different types of food systems and the many drivers impacting them.

23. Moreover, the VGFSyN provide [voluntary](#) guidance to relevant actors involved in humanitarian contexts in order to bridge the gap between humanitarian and development work and integrate nutrition and longer-term strategies for sustainable development into emergency and humanitarian responses, with a view toward strengthening the resilience and adaptive capacity of food systems.

24. The functionality of food systems and their ability to deliver sustainable and healthy diets is influenced by a number of drivers which indicate that, in order to improve nutrition, context specific changes are needed not only in agriculture and food policy but also in development priorities, economic policies, and social norms. [Funding sources for all of these drivers will need to be identified on a local level.](#) These drivers can be categorized as follows:

- a) biophysical and environmental (natural resource and ecosystem services, biodiversity, climate change, water, and soils);
- b) innovation, technology, and infrastructure;
- c) political and economic (leadership, globalization, foreign investment, trade, food policies and regulatory frameworks, land tenure, conflicts, and humanitarian crises);
- d) socio-cultural (culture, religion, rituals, social traditions, poverty, inequalities, and women’s rights and empowerment);
- e) demographic drivers (population growth, age distribution, urbanization, migration, and forced displacement).

¹² FAO/WHO. 2014. ICN2, [Rome Declaration on Nutrition](#). Paragraph 5.b.

1.3 NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS

25. The VGFSyN are non-binding and should be interpreted and applied consistently with existing obligations under relevant national and international law, including the Universal Declaration of Human Rights and other international human rights instruments, and with due regard to voluntary commitments under applicable regional and international instruments. CFS guidance should build on and integrate existing instruments and frameworks for action adopted in the context of the UN system, including Member States-endorsed guidance and recommendations.

26. The VGFSyN are expected to build upon and complement related guidance contained in other CFS products, and are intended to avoid duplication of the work and mandate of other international bodies. In order to ensure policy coherence, specific attention should be paid to:

- [CFS Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of the national food security](#) (2004),
- [CFS Voluntary Guidelines on the responsible governance of tenure of land, fisheries and forests in the context of national food security – VGGT](#) (2012),
- [CFS Principles for responsible investment in agriculture and food systems – RAI](#) (2014), and
- [CFS Framework for Action for food security and nutrition in protracted crises – FFA](#) (2015)
- [CFS Policy Recommendations on Connecting Smallholders to Markets](#) (2016).

27. The VGFSyN are primarily targeted at governments to help them design public policies. They are also meant to be used in policy discussions and implementation processes by relevant stakeholders such as:

- a) Governmental actors, including relevant ministries and national, sub-national, and local institutions, and parliamentarians;
- b) Intergovernmental and regional organizations, including specialized agencies of the UN;
- c) Civil society organizations, including those representing indigenous people, vulnerable groups and communities;
- d) Private sector;
- e) Research organizations, academics and universities;
- f) Development partners, including international financial institutions;
- g) Private donors, foundations and funds;
- h) Consumer protection associations;
- i) [Agricultural sector; large and smallholder farmers and large and smallholder farmer organizations.](#)

PART 2 - KEY CONCEPTS AND GUIDING PRINCIPLES

2.1. KEY CONCEPTS CONCERNING FOOD SYSTEMS AND NUTRITION

28. **Food systems** “gather all the elements (environment, people, inputs, processes, infrastructures, institutions, etc.) and activities that relate to the production, processing, distribution, preparation and consumption of food, and the output of these activities, including socio-economic and environmental outcomes”¹³.

29. **Sustainable food systems** “are food systems that ensure food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition of future generations are not compromised”¹⁴.

30. **Sustainable and healthy diets** “promote all dimensions of individuals’ health and wellbeing; have low environmental pressure and impact; are accessible, affordable, safe and equitable; and are culturally acceptable. The aims of sustainable [and] healthy diets are to achieve optimal growth and development of all individuals and support functioning and physical, mental and social wellbeing at all life stages for present and future generations; contribute to preventing all forms of malnutrition (i.e. undernutrition, micronutrient deficiency, overweight and obesity); reduce the risk of diet-related NCDs; and support the preservation of biodiversity and planetary health. Sustainable [and] healthy diets must combine all the dimensions of sustainability to avoid unintended consequences”¹⁵.

31. **The right to adequate food** “is realized when every man, woman and child, alone or in community with others, have the physical and economic access at all times to adequate food or means for its procurement”¹⁶.

2.2. GUIDING PRINCIPLES FOR RESHAPING OR PROMOTING SUSTAINABLE FOOD SYSTEMS

32. Food systems serve and support multiple objectives within the three dimensions of sustainable development. While food systems might differ greatly, they offer important opportunities for public policies, mechanisms, instruments and investment that aim to advance the goals of the 2030 Agenda for Sustainable Development.

¹³ HLPE. 2014. [Food Losses and Waste in the context of Sustainable Food Systems](#). A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.

¹⁴ HLPE 2017b

¹⁵ Adapted from [FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome](#)

¹⁶ The definition of the right to adequate food is given by [the Committee on Economic Social and Cultural Rights \(CESCR\) which, through the general comment 12](#), is interpreting Article 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR).

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33. The VGFSyN include a number of [voluntary](#) guiding principles¹⁷ that should be followed to contribute to reshaping or promoting sustainable food systems, enabling sustainable and healthy diets, improving nutrition, and promoting sustainable development.
34. These guiding principles are:
- a) **Systemic, holistic and evidence-based approach.** Promote a systemic, multi-sectoral, and science-~~and~~ evidence-based approach that considers food systems in their totality, integrates indigenous and traditional forms of knowledge, seeks to simultaneously maximize outcomes across all sustainability dimensions, and looks at the multidimensional causes of malnutrition in all its forms.
 - b) **Coherent and context-specific policies.** Contribute to the formulation and implementation of coherent, context-specific and evidence-based policies and related investment through coordinated actions among different actors and across all relevant sectors at international, regional, national, subnational, and local levels.
 - c) **Governance and accountability.** Support efforts in strengthening governance and accountability mechanisms that contribute to fostering citizen participation in national debates on food security and nutrition, and transparent and inclusive decision-making processes.
 - d) **Healthy people, [healthy communities](#), healthy planet.** Promote policies that enhance the livelihoods, health, and wellbeing of the population, ensuring sustainable food production and consumption as well as the protection of biodiversity and ecosystems.
 - e) **Gender equity and women's empowerment.** Promote gender equity and women's and girls' empowerment, promoting and fulfilling their rights and considering the importance of creating the conditions for women's involvement in decision-making and strong engagement in shaping food systems that improve nutrition, given their key role in care, education, [agriculture/livestock management](#), health promotion and food consumption.
 - f) **Nutrition knowledge and awareness.** Strengthen nutrition education, knowledge and literacy at individual and community levels to facilitate producers', food processors' and consumers' decisions and to foster informed choices about food products for sustainable and healthy dietary practices. Health professionals, especially, should be trained on nutrition [and/or partner with appropriately trained and licensed dietitians/nutritionist experts](#).
 - g) **Realization of the Right to Adequate Food.** Promote the progressive realization of the right to adequate food in the context of national food security going beyond ensuring minimum requirements and including access to food that is nutritionally adequate.

¹⁷ These guiding principles make reference to already agreed international documents and tools, such as the Rome Declaration on Nutrition and the Framework for Action of ICN2.

- h) **Capacity building.** Strengthen human and institutional capacities, particularly among nutrition and food system actors, to reshape food systems to deliver sustainable and healthy diets, and to promote adequate food habits.

PART 3 - THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION

35. The VGFSyN provide guidance on actions at multiple points across food systems, recognizing that food systems are interconnected and that any action to address one part will impact another. These actions can have both benefits and unintended consequences. Founded upon the principles of the right to adequate food, the VGFSyN provide a framework to promote policy coherence and to bring various stakeholders – people and organizations – who are involved in food systems to work holistically and together to deliver sustainable and healthy diets for optimal nutrition outcomes.
36. The VGFSyN provide policy entry points, tools, and mechanisms across the constituent elements of food systems, namely food supply chains¹⁸, food environments¹⁹, and consumer behaviour²³. They provide a range of actions that States, and other actors can consider to improve food systems to achieve better nutrition outcomes, with governments being critical in orchestrating effective enabling environments.
37. This part is structured around the following six main sections:
- on governance of food systems which underpins and cuts across the other five sections;
 - on food supply chains which determine the availability of safe and nutritious food;
 - on actions to be taken to ensure accessibility of sustainable and healthy diets;
 - on the notion that people are central to nutrition knowledge and education;
 - on women’s empowerment in food systems - as they are often the most vulnerable - but with great potential for reshaping food systems for the future; □ on humanitarian contexts.

3.1 TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS

38. This part of the VGFSyN addresses the governance of food systems for enhancing nutrition. It covers issues of leadership and accountability, from global to local levels, across food systems.

¹⁸ Food supply chains “consist of the activities and actors that take food from production to consumption and to the disposal of its waste”, including production, storage, distribution, processing, packaging, retailing and marketing. HLPE 2017b

¹⁹ 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”. HLPE 2017b

²³ Consumer behaviour “reflects all the choices and decisions made by consumers on what food to acquire, store, prepare, cook and eat, and on the allocation of food within the household”. HLPE 2017b

3.1.1 Building on multi-sectoral actions and coordination

- a) States should facilitate an inclusive dialogue ensuring the participation of a range of stakeholders working with or in food systems, including national and international organizations from civil society, indigenous people, the private sector, [agricultural sector, including large and small holder farmers](#), the UN, donors and national researchers. This dialogue should cover all dimensions of food systems, including production, distribution, marketing, ~~and~~ consumption, [and waste](#). Marginalized and the most vulnerable social groups should participate in the process of defining policies and strategies at national and local levels to prevent and combat hunger and malnutrition.
- b) Considering the pivotal role of the private sector in the production, distribution and sale of food, States should facilitate an inclusive dialogue with the private sector, [agricultural sector and include large and smallholder farmers' voices](#) to build strategies that improve food environments.
- c) States and inter-governmental organizations should encourage increased financial investment to support food systems that deliver sustainable and healthy diets.

3.1.2 Promoting policy coherence by integrating nutrition into national development

- a) States should align policies that affect nutrition across sectors, ministries and agencies, and strengthen legal frameworks and institutional capacities to deal with the multiple causes and consequences of malnutrition. This can be done by establishing or strengthening multi-sectoral, multistakeholder mechanisms that oversee the implementation of evidence-based policies, strategies and interventions.
- b) States should integrate food system approaches that promote nutrition in national development, health, economic, and disaster risk reduction plans. This should be complemented with increased budgetary allocations to food system activities that relate to improving diets and nutrition, [research and effective data collection](#), and transparent indicators to track and assess the full cost of addressing malnutrition in all its forms.
- c) States should foster policy coherence across sectors to reduce all forms of malnutrition. These sectors include agriculture, [large and small holder farmers](#), environment, energy, water, sanitation, hygiene, health, education, fiscal policies, trade, investment, and economic and social development.
- d) States, UN agencies, and international organizations should identify opportunities to achieve national and global food and nutrition targets set out by the WHA and the SDGs.

3.1.3 Instituting accountability mechanisms, monitoring and evaluation

- a) States should institute strong and transparent accountability mechanisms that pertain to different food system actors. These mechanisms should promote good governance, public deliberation, independent bodies monitoring compliance and performance, remedial actions to improve accountability, and [build](#) capacity to manage conflicts of interest and settle disputes that may undermine public health [or any other actor within the food system](#).
- b) States should ensure that multilateral and bilateral trade and investment agreements are consistent with nutrition, food and agriculture national policies and favour the transition

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towards more sustainable food systems, assessing how the health, environmental, social and economic outcomes of food systems are likely to be affected. This should include an assessment of how competition will be impacted, and whether and how levels of concentrated market power will change.

- 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 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.

3.2 SUSTAINABLE NUTRITION-ORIENTED FOOD SUPPLY CHAINS IN THE CONTEXT OF CLIMATE CHANGE

39. Food chains operate at assorted scales and levels, from the shortest supply chains, to long, highly complex and globalized chains. The decisions made by the actors at any stage have implications on the availability, affordability, accessibility, acceptability, and safety of nutritious food for a healthy diet. Climate change and other environmental constraints are also making food supply more challenging.

3.2.1 Ensuring sustainable use and management of natural resources

- a) States, farmers and other food producers should ensure that soil fertility is addressed as central to agriculture production systems, because nutrient-rich soils are critical to the production of food necessary for healthy diets. States should encourage the use of ecosystem services (including proper livestock management) which maintain soil biodiversity and nutrient balance, and promote carbon storage without compromising the ability of farmers and food producers to grow sufficient, nutritious food.
- b) States should ensure the management, control and sustainable use of water resources for agriculture and food production through regulation and community participatory approaches. These approaches should foster the reduction of water wastage in irrigation, ensure the systematic use of appropriate water-saving technologies, minimize water pollution stemming from agriculture, and promote the multiple uses of water (including wastewater) without compromising the ability of farmers and food producers to grow sufficient, nutritious food.
- c) States should foster the protection of biodiverse landscapes and food and agriculture production systems including crops, livestock, forestry and plantations, fisheries and sustainable aquaculture. They should encourage the adoption of practices, including agroecological approaches, that ensure that the biodiversity of landscapes, including forests, waters and coastal seas, other agro-ecosystems, and silvo-pastoral systems, is conserved and sustainably used without compromising the ability of farmers and food producers to grow sufficient, nutritious food.
- d) States and private sector food actors should protect the biodiversity of forests and fisheries that are currently over-sourced, over-exploited, and endangered, by implementing the VGGT and other relevant international agreements.

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- e) States should promote the diversification of crops and animals including neglected and underutilized traditional crops, fruit, vegetables, legumes, nuts, and seeds, and animal-source food, applying sustainable food production and natural resource management practices [without compromising the ability of farmers and food producers to grow sufficient, nutritious food](#) .
- f) States should protect the rights of indigenous people and other communities with customary tenure systems that exercise self-governance of land, fisheries and forests, to land territories and resources they have traditionally owned, occupied or otherwise used or acquired. They should be provided with equitable and sustainable rights to those resources, their livelihoods should be maintained, their indigenous knowledge and practices should be valued, their access to traditional food should be protected, and their diets, nutrition and wellbeing should be prioritized [without compromising the ability of farmers and food producers to grow sufficient, nutritious food](#) .

3.2.2 Promoting nutrition within agriculture and food production

- a) States should promote nutrition-sensitive agriculture and diversified food production through the integration of nutrition objectives into national food and agriculture policies.
- b) States, private sector food actors and development partners should support and incentivize small [and large](#) holders, particularly within developing countries, to adopt sustainable production practices and to produce diverse crops that will contribute to the availability, affordability and accessibility of nutritious food, while enhancing farmers' income and livelihood.
- c) States, private sector food actors and development partners should support sustainable livestock, small animal and fishery systems (including artisanal fish and other aquatic systems) because they contribute to the protection and development of livelihoods, provide income, and supply key nutrients for health and wellbeing.
- d) States and private sector food actors should ensure [small and large holder](#) farmers and other food producers have access to seeds, modern and sustainable technologies, as well as skill training and capacity development to be able to use those technologies that could improve the production and quality of crops. These include, among others, biofortified crops, through on-farm conventional breeding, and sustainable agriculture technologies including better management of pollination and nutrient cycling, as well as new technologies [without compromising the ability of farmers and food producers to grow sufficient, nutritious food](#).
- e) States should integrate urban and peri-urban agriculture and urban land use into national and local agricultural development strategies, food and nutrition programmes, and urban planning, as a viable input into healthy diets for growing urban populations and social cohesion of communities.
- f) States should invest in research and innovation for commercial development of nutritious crops, such as fruit, vegetables, healthy oils, nuts and seeds, legumes, biofortified crops, and diverse animal-sourced food, which are developed through conventional on farm breeding (**this phrase is limiting. It limits the ability of the farmer to improve yield, resistance to disease, etc. by improving the genetics of their herd**). and are sustainable for small [and large](#) holders [without compromising the ability of farmers and food producers to grow sufficient, nutritious food](#) .

3.2.3 Improving food storage, processing, transformation and reformulation

- a) States and private sector food actors should foster the development and uptake of adapted and affordable storage facilities, or invest in adequate storage, including cold storage, to allow for small [and large](#) holders and food actors to have greater flexibility when they can sell their products, and to allow consumers to buy such products at adequate prices. States should also invest in transportation and road infrastructure to ensure the production of small [and large](#) holder farmers are able to reach markets. These supply chain investments should be complemented with improved and accessible information technology, training and capacity building to increase farmers' opportunities to deliver diverse, perishable, safe and nutritious food to market and for consumers to access those markets.
- b) States and private sector food actors, including [small and large holder](#) farmers and their associations, should facilitate minimizing food and nutrient loss on farms, during post-harvest storage and throughout processing and transportation, particularly of perishable food such as fruit, vegetables, dairy, and animal source food. Facilitation includes training and capacity, management practices and fostering the adoption of appropriate technologies, such as cold chambers storage units, solar walk-ins, refrigerators and dry storage, storage drums and drying facilities [without compromising the ability of farmers and food producers to grow sufficient, nutritious food](#).
- c) States should incentivize private sector food actors to work towards more sustainable and safe packaging of products such as nanotechnology, waxing, plant-based wrapping, ~~and~~ [biodegradable plastics, and other packaging solutions while enhancing farmer's income and livelihood](#).
- d) States should establish guidance for the use and scale-up of processing technologies that can improve the nutritional content of food (fortification/biofortification), minimize nutrient postharvest losses, and promote longer-term storage of food, particularly during periods of drought and poor production. Such technologies could include flash and solar drying, converting food to pastes and spreads, and fortification through conventional on farming breeding of staples and oils. States should set guidelines and monitor the level of processing as [nutrient poor highly-processed food or beverages](#) have associations with unhealthy diets, overweight and obesity.
- e) States should institute regulatory instruments to promote reformulation, complemented with warning labels and taxes on less nutritious food products that do not adhere to national food-based dietary guidelines. [Research and monitoring will be necessary to assess the success of programs of this nature, as well as unintended consequences of these actions that might arise](#).
- f) Private sector food and beverage actors should strive to meet public health goals by reformulating food to ensure less nutritious ingredients – such as sugars, salt/sodium and unhealthy fats such as trans fats – are minimized or eliminated in food and beverage products and nutritious ingredients such as fibre, fortificants, and other health promoting ingredients are increased. [Consideration of local traditions, culture and diets will be important. Consumers can play an active role as well via education and making wiser food choices](#).

3.2.4 Making markets work for nutrition

- a) To reduce food price volatility of nutritious food, states should promote transparency across food-related market transactions in real-time, with more emphasis on nutritious commodities, including enhanced tracking of food supply and stock data, and future prices.
- b) States should increase public investment in market infrastructure (roads and bridges, physical markets, storage facilities), to reduce transaction costs and food market performance particularly for perishable and nutritious food.
- c) States and private sector actors should support small and large holders to meet safety and quality standards of nutritious food that enable them to fulfill demand for the local consumption whilst reaching broader markets and getting higher profits for their products.
- d) It is worth acknowledging and considering the collaborative benefits received by individual small holders via cooperatives or other forms of aggregation.

3.2.5 Improving nutrition and health of farm and food system workers

- a) States and private sector actors, agricultural actors, small and large holder farmers should ensure that those who grow the world's food, have sufficient livelihoods to ensure they too can access healthy diets for their own optimal nutritional status. This means ensuring food producers and workers are food secure, have decent wages, and can access health services.
- b) States should ensure that right to decent work are respected, protected and fulfilled, that farmers and other food producers and workers are protected and safe, and there is no unnecessary burden or undue labour which could negatively impact their health.

3.2.6 Prioritizing climate adaptation and mitigation

- a) States should support and assist small and large holder farmers and other food producers to lower the environmental impact of food systems. This could be done by fostering appropriate technology and changes in management to improve crop yields and reduce non-organic fertilizer and pesticide usage. States could promote optimization of agricultural outputs per unit of water, energy, and land, and manage the carbon footprint of agriculture activities without compromising the ability of farmers and food producers to grow sufficient, nutritious food.
- b) Development partners and Non-Governmental Organizations (NGOs) should provide technical assistance to farmers and other food producers to help them adapt to, and ensure food supply chains are resilient to, climatic shocks and humanitarian crises. Interventions could include access to finance, insurance, better forecasting data, and productive-asset creation initiatives (e.g. rehabilitating degraded land and infrastructure building).
- c) States should assist farmers and other food producers to protect crops and livestock and their production systems from the anticipated impacts of climate change in the form of pests, diseases, weather-related shocks, and extreme price volatility through innovations such as cover crops, no-till farming, crop and weather insurance, and renewable energy technologies without compromising the ability of farmers and food producers to grow sufficient, nutritious food.
- d) States should support investment in diverse and nutritious crops and animal production systems, enhanced storage and marketing, reduced food loss and resilience-focused adaptations. Donors and investors should diversify agricultural investment based on ecological

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suitability, such that a greater diversity of production systems are supported, varied and at scale to meet the needs of both large and small farmers.

- e) States should include dietary quality indices (how is this defined?) and other food system metrics as part of climate-related target-setting agendas and in related surveillance systems (including early warning systems) to monitor changing conditions and the effectiveness of policy responses.
- f) Researchers should promote the generation and use of rigorous evidence on investment along food supply chains that are resilient to climate change while also delivering positive dietary outcomes. Research should focus on potential interventions and policy entry points to ensure agricultural production, processing and packaging, retail and markets, and consumer demand are adaptable to climate change and disruption.

3.2.7 Empowering youth in food systems

- a) States should engage and empower youth by enhancing their access to productive land, natural resources, inputs, productive tools, extension, advisory service, and financial services, education, training, markets, information, and inclusion in decision-making.
- b) States and private sector food, [agricultural](#) actors should provide appropriate training, education, and mentorship programmes for youth to increase their capacity and access to decent work and entrepreneurship opportunities to stimulate their contribution to reshaping food systems.
- c) States and private sector food, [agricultural](#) actors should promote development and access to innovation and new technologies along food supply chains that enhance nutrition, especially to attract and enable youth to be drivers of improvement in food systems.

3.2.8 Supporting food safety across food supply chains

- a) States should prioritize food safety within their food systems and consider actions concerning handling, preparation, storage, and distribution of food in ways that prevent food-borne illnesses, transmission or contamination of naturally occurring toxins, pesticides, antibiotics and heavy metals. Investment should be made to train food handlers and adopt scientific, risk-based practices that can provide safe food while retaining their nutritional value.
- b) States should develop, establish, enforce and strengthen, as appropriate, food control systems, including reviewing and modernizing national food safety legislation and regulations to ensure that food producers and suppliers throughout the food chain operate responsibly. Considering the centrality of the *Codex Alimentarius Commission* on nutrition and food safety, States should implement, as appropriate, internationally adopted standards at the national level.
- c) States should participate in, and contribute to, international networks to exchange food safety information, including the management of emergencies to improve the safety of food across a range of issues such as pesticide residues, antimicrobial residues, endocrine disrupters, chemical and unsafe food additives, pathogenic bacteria, viruses, and parasites.
- d) To address global antimicrobial resistance (AMR), States should develop and implement national guidelines on the prudent use of antimicrobials in food-producing animals according to internationally recognized standards adopted by competent international organizations. This is

to reduce the non-therapeutic use of antimicrobials and to phase out the use of antimicrobials as growth promoters in the absence of risk analysis as described in the *Codex Code of Practice CAC/RCP61-2005*.

3.3 EQUITABLE ACCESS TO SUSTAINABLE AND HEALTHY DIETS

40. Policies and programmes aimed at improving food environments to ensure healthy diets are available, accessible, affordable, culturally acceptable, and safe, should be prioritized by States in the interest of their citizens. For many people, physical access to nutritious food can be problematic as it may not be available in local markets or the markets. Nutritious food can also be unaffordable, particularly food that is perishable or comes from a longer distance.

3.3.1 Improving physical access to nutritious food

- a) States should ensure people's physical barriers are minimized to purchase or order diverse types of nutritious food in a given food environment. This can be done by instituting policies that encourage healthy outlets to populate "food deserts²⁰" with markets that sell nutritious, affordable food, and stop the spread of "food swamps²¹" by creating robust zoning laws that restrict food retail outlets which sell an overabundance of less nutritious food.
- b) States should encourage zoning laws and tax incentives for farmers' markets and mobile food retailers that sell nutritious food in low-income areas, and reduce the density of fast-food vendors that sell less nutritious food. Monitoring systems to test the efficacy of these programs should be instituted as well.
- c) States should take into consideration an equity lens when examining access to food environments and ensure members of historically marginalized and vulnerable communities, residents of low-income communities, indigenous people, and those living in rural areas have sufficient access to diversified food markets.
- d) States should improve the availability and access of the food supply through appropriate trade and investment agreements and policies and ensure that such agreements and policies do not have a negative impact on the realization of the right to adequate food in other countries.
- e) States should facilitate access to nutritious food for poor households through vouchers, cash or food supplement programmes. These programmes could substitute basic staple food (such as rice or wheat flour) with more nutritious food in the food basket provided to poor households.

3.3.2 Improving the availability of nutritious food

- a) States should promote the provision of nutritious food through local farmers markets, community cooperatives and other community building efforts that engage citizens around local food culture.

²⁰ "Food deserts" are geographic areas where access to food is restricted or non-existent due to low density of "food entry points" within a practical travelling distance. HLPE 2017b

²¹ The term "food swamps" describes areas where there is an overabundance of less nutritious food but little access to nutritious food. HLPE 2017b.

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- b) States should encourage small and medium enterprises to competitively participate in wet markets, local, domestic and informal markets, and incentivize street vendors to improve the health composition of prepared food through financial incentives and certifications.
- c) States should strengthen public procurement systems by ensuring nutritious food is more accessible and convenient in institutions such as schools, hospitals, foodbanks, and prisons. States should consider promoting home grown school meals, where food served in schools is procured from local and/or family farmers, which can have multiple food system benefits by establishing stable markets for producers while serving more recommended, healthy diets to children. (this is a bit idealized. Not all states/locales will be able to do this. In order to maintain a diverse, nutritious diet other considerations will often need to be made).

3.3.3 Making nutritious food more affordable

- a) f) States should consider pricing policies of perishable fruit and vegetables, whole grains, legumes, nuts and seeds, and animal source food to ensure they are affordable and competitive compared with nutrient poor highly processed food (which can be inexpensive but high in added sugars, sodium and trans-fats or unhealthy fats). This can be done through promoting nutrient rich foods and input subsidies, access to credit, and tax. Monitoring systems to test the efficacy of these programs should be instituted as well.
- b) a) States can be instrumental in reducing the prices of nutritious food by helping farmers reduce their production costs. This can be accomplished through grants, subsidies and non-financial support services to reduce inefficiencies, enhance yields, and promote value of nutritious food in the supply chain.
- c) b) States and local governments, in collaboration with consumers' associations, can institute regulations and incentives to help existing food retailers increase the number and variety of nutritious food products they sell. This can be done by creating local food policy councils to give residents a voice in how best to improve access to healthy diets in their communities.
- d) c) States should institute tax incentives and other fiscal policies to promote more nutritious food in the food industry. This can be done by creating disincentives including excise or sales taxes on less nutritious food, such as sugar sweetened beverages and less nutritious or nutrient poor-highly processed food, or removing industry tax benefits for the development and marketing of less nutritious food. Tax revenues can also be used for health promotion strategies including retail, manufacturing, or agricultural incentives to reduce the price of nutritious food. Monitoring these programs to assess efficacy and avoid unintended consequences should be considered as well.

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3.3.4 Monitoring new technologies and trends for healthy diets

- a) States and researchers should understand the influential roles of the internet, social media and online shopping on the access to healthy diets, addressing the digital divide among different demographics through the use of portable tools to minimize disparities in access to food.
- b) States and private sector food actors should ensure that with the emerging trend of increased consumption of food consumed away from home, restaurants are incentivized to promote nutritious food options, display information about food on menus (i.e. calories, and other nutritional content), and adhere to food safety regulations.

- c) With regard to environmental sustainability, States should understand, scrutinize and govern new food technologies (e.g. lab grown meats, gene editing, biofortified crops, etc.) through CODEX standards as any new food product does in international regulatory frameworks.

3.4 PEOPLE-CENTERED NUTRITION KNOWLEDGE, EDUCATION AND INFORMATION

41. People, both individuals (rights-holders) and members of institutions (duty-bearers), are at the centre of food systems, acting as drivers and experiencing outcomes. Access to knowledge, education and the quality of information available to people on nutritious food, healthy diets and nutrition should become a priority. This prioritization could be done by utilizing available and effective tools, key actors across food systems, and the places in which people access food in their daily lives. It is also important to consider the range and diversity of food cultures, social norms and traditions that influence healthy diets.

3.4.1 Putting people at the centre of nutrition knowledge, education and information

- a) States should pay particular attention to dietary and nutritional needs across the entire lifecycle including pregnant and lactating women, women of reproductive age and adolescent girls, infants, children under five, people living with HIV and tuberculosis, the elderly and people with disabilities. States should ensure food systems are delivering healthy diets for these populations and mitigating against all forms of malnutrition.
- b) States should use the best scientific evidence to promote education and knowledge of healthy diets, physical activity, food waste and safety, adequate breastfeeding and complementary feeding, taking into consideration cultural and social norms and adapting to different audiences and contexts. Strong mechanisms need to be in place to assess “best science.” Advisory panels, as exist in many countries, is a good vehicle but not always enough.
- c) States, civil society community leaders, and health professionals should promote food culture amongst communities, including access to culinary skills and stressing the importance of food within cultural heritage, as a vehicle to promote nutrition literacy. This can be done through community participation, associations and educational institutions.
- d) States should protect and promote the knowledge that indigenous people have with regard to methods of producing, preparing and preserving food that imparts nutritional and environmental benefits.
- e) Private sector actors should increase the acceptability of nutritious food by producing and marketing packaged food of this kind in a way that is convenient for people to prepare, cook and eat. In regions where the benefits of processing and “ultraprocessed” foods are debated, relaxing these definitions may be necessary to allow for the wide-spread production of accessible, convenient foods.

3.4.2 Utilizing policies and tools to increase knowledge, education and information

- a) States should develop national food-based dietary guidelines that define context-specific, sustainable and healthy diets by taking into account social, cultural, scientific, economic, ecological and environmental drivers.

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- b) States should develop nutrition standards and regulations for the marketing of food and beverages to children and ban advertising of less nutritious food to children, as they are particularly susceptible to the influence of food marketing.
- c) States should institute easy-to-read front-of-pack labelling of evidence informed metrics/warnings such as overall fat quality (e.g. unsaturated to saturated fat ratio), trans-fats, carbohydrate quality (e.g., carbohydrate to fiber ratio), added sugars, and sodium. Food with warning signs should be regulated – i.e. not sold in or near schools and not advertised to children. Ongoing monitoring of the science will be necessary to adapt labels as new science becomes available.
- d) States should regulate the marketing of commercial infant formula and other breast-milk substitutes and implement the full set of WHO recommendations on the marketing of breastmilk substitutes and of food and non-alcoholic beverages to children. The International Code of Marketing of Breast-milk Substitutes²² needs to be enforced through accountability mechanisms and international legislative enforcement.
- e) Private sector food actors should consider the design of food markets, restaurants and other places where food is sold or served to shape nutritious food choices and decision making. Incentives, sales and discounts should be put into place that encourage the placement and promotion of nutritious food products in retail spaces.
- f) States, chefs, dietitians, private sector food actors and NGOs should implement nutrition education and information interventions based on Food-Based Dietary Guidelines and other policies related to food and diets, through improved school curricula, nutrition education in the health, agriculture and social protection services, and community interventions.
- g) States should consider the inclusion of nutrition information within agriculture extension technical packages as a way to support producers in increasing the production of high nutrient density crops and crop diversification.
- h) NGOs, dieticians, and chefs should consider coupling nutrition education and counselling with maternal and child nutrition programmes (e.g. food supplements, micronutrient supplements, or conditional cash transfers) to double down impacts on dietary and nutritional outcomes.
- i) States, UN and NGOs should promote social and behavior change communication (SBCC) and social support interventions as a way to improve nutrition. SBCC can be used by different actors as a way to influence behaviour change by positively influencing knowledge, attitudes and social norms, coordinating messaging across a variety of communication channels to reach multiple levels of society.
- j) States, chefs and private sector food actors should educate all food system stakeholders to prioritize the reduction of food waste. Actions could include awareness campaigns at national, regional and global levels, labelling schemes, and updating Food-Based Dietary Guidelines to align recommendations with policies and programmes to tackle food waste. **Education regarding food preservation/refrigeration, etc would help as well.**
- k) States should draw on the knowledge, experience and insights of individuals who are not usually regarded as members of the nutrition community - e.g. community leaders, chefs, supermarket

²² [International Code of Marketing of Breast-Milk Substitutes](#). WHO, 1981. Geneva.

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buyers, influencers on social media, youth leaders, young entrepreneurs, mayors and local communities - in the development of multi-component, community-based media campaigns promoting nutrition education and the benefits of healthy diets.

k) The role of the consumer should be stressed as well. The choices the consumer makes will ultimately affect the products the private sector produces/supplies.

3.4.3 Promoting “hubs” for nutrition knowledge, education and information

- a) Universities and schools should institute a nutrition curriculum for all medical and nursing students during training.
- b) States should support school and worksites to serve nutritious food to school-aged children and workers and promote culinary skills among school age children, adolescents and in adults, to

- c) promote communal meal times, socializing around food, the consumption of healthier diets and the need to reduce food waste.
- States should link the provision of healthy school meals with clear nutritional objectives and be adapted to the needs of different age-groups, with special attention to the needs of adolescent girls. Policymakers should review education curricula to incorporate nutrition education principles, while adopting practical teaching tools such as school gardens and culinary lessons, and providing technical support to help schools implement changes.

3.5 GENDER EQUITY AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS

42. Gender relationships and norms are among the most significant drivers of healthy diets. In many countries, women make decisions about the household's diet and, as primary caregivers, they have an influence on the family's nutritional status. Therefore, women's and girl's empowerment through education, information and access to resources and services is key to improving nutrition. Improving women's wellbeing, ensuring access to financial, technical and biophysical resources, improving agency, voice and status, and challenging the power relationships that limit choices, are promising policy entry points to empower women and ultimately, improve food security and nutrition.

3.5.1 Recognizing women's nutritional status and deprivation

- a) States, UN agencies and NGOs should prioritize the nutritional wellbeing of adolescent girls and women and provide health and nutritional care and services through various sectors. This can be done by ensuring they are central to national development strategies, and the recipients of social protection policies and benefits, which can break the inter-generational cycle of malnutrition.
- b) Acknowledging the significant time and work burden of women in the preparation of nutritious food at the household level, and their roles in agriculture and food production, States should recognize and value the importance of unpaid care work at household level through protective laws, social protection programmes and other benefits.
- c) States should create an enabling environment to promote breastfeeding, ensuring that decisions to breastfeed do not result in women losing their economic security or any of their rights. This would include removing workplace-related barriers to breastfeeding (breaks, facilities, and services) and labour laws to protect women who chose to breastfeed.

3.5.2 Promoting and acknowledging women as food system entrepreneurs

- a) States should advance women's equal tenure rights, and their equal access to and control over productive land, natural resources, inputs, productive tools, and promoting access to education, training, markets, and information in line with the *VGGT*. This can be done by strengthening women's access to natural, physical, financial, human, and social capital, so they can effectively contribute to sustainable food systems that promote nutrition.

- c)
- b) States should enhance women's roles in agriculture by giving women decision-making power over what is produced, why, and how. Women should be offered extension and advisory services for crops and animal products that they produce or process, capacity-building to engage with traders, financial services (credit and savings mechanisms), and innovative entrepreneurial opportunities across food systems.
States should promote labour and time saving technologies for women such as food preservation and processing equipment, cold storage, heat and thermal processing, grinding/blending devices, energy saving stoves, and modern farm equipment for ploughing, cultivating and harvesting nutritious food.
- d) States should facilitate women's access to opportunities to generate income and increase their participation in decisions on the use of household income. This would include activities such as household and business budget training, and tools to help men and women strengthen their intra-household communication and decision-making skills.

3.5.3 Empowering women across food systems

- a) States should enhance women's meaningful participation in partnerships, decision-making, leadership roles, and the equitable sharing of benefits. A priority should be to strengthen rural women's participation and representation at all levels of policymaking for food security and nutrition, to ensure their perspectives are equally taken into account.
- b) States should increase women's human capital by ensuring that women and girls have access to education and literacy, health care services and social services, as a way to increase household nutritional status.
- c) States should enshrine laws that give women and men shared participation in political decisionmaking and equality, supporting women holding leadership roles in decision making bodies – parliaments, ministries and local authorities at district and community levels – so that they can be part of the process of devising solutions to the malnutrition challenges they face.

3.6 FOOD SYSTEMS AND NUTRITION IN HUMANITARIAN CONTEXTS

43. This part build upon the 11 principles in the FFA. In situations of humanitarian crises, there is a critical need for nutrition interventions that link humanitarian responses with longer-term strategies to strengthen the resilience of food systems and improve food security and nutrition. For populations with optimal nutritional status at the onset of a humanitarian crisis, their status needs to be protected so that it does not worsen. For those who are already dealing with a malnutrition, emergencies can be a tipping point which can exacerbate malnutrition issues.

3.6.1 Improving the nutritional quality of food and nutrition assistance

- c)
- a) States, all parties involved in conflicts, natural disasters and food assistance, including humanitarian organizations, should ensure that food security and nutrition assessments are undertaken throughout a crisis. These assessments should adhere to internationally accepted methods, and be impartial, representative and well-coordinated with governments.
- b) States, parties involved in conflict and natural disasters and humanitarian organizations should provide timely, safe, and sufficient assistance in response to humanitarian crises in a flexible manner, conforming with the beliefs, culture, traditions, dietary habits and preferences of individuals, in coordination with all stakeholders. The assistance should promote survival, uphold dignity and build resilience.
States should ensure the basic nutritional needs of those people affected by a humanitarian crisis, including the most nutritionally vulnerable. The food items provided should be of appropriate quality, acceptable, and can be used efficiently and effectively. Food must conform to the food standards of the host country's government as well as to the Codex Alimentarius standards about quality, packaging, labelling and fitness for purpose.
- d) States and humanitarian assistance organizations should explore partnerships with industry to ensure micronutrient-fortified food is available through social protection mechanisms and acute malnutrition management programmes, with improved coverage during times of crisis. States, UN agencies and NGOs should work to ensure infant and young child feeding practices are promoted and improved upon during humanitarian crises.
- e) UN agencies and humanitarian assistance organizations should ensure that when implementing cash and voucher assistance, the minimum expenditure basket and transfer value is promoting nutritious food that is locally available and sufficient to provide a healthy diet.

3.6.2 Protecting nutritionally vulnerable groups

- a) States and humanitarian organizations should pay particular attention, protection, and facilitate access to nutritious food and nutritional support to pregnant and lactating women, women of reproductive age and adolescent girls, infants, children under five, people living with HIV and tuberculosis, the elderly and people with disabilities.
- b) States and parties involved in conflicts should respect and protect the equal and unhindered access of all members of affected and at-risk populations to food security and nutrition assistance, in both acute and protracted crises, in accordance with internationally recognized humanitarian principles, as anchored in Geneva Convention of 1949. The design and delivery of food assistance should minimize the risk to recipients and contribute to preventing and ending gender-based violence.
- c) States, with the support of the UN system and international assistance and cooperation where appropriate, should ensure access to nutritious food and nutritional support for refugees and

- c) asylum seekers in their territory in accordance with their obligations under relevant international legal instruments.

3.6.3 Making food systems resilient

- a) States should develop early warning systems and food and agriculture information systems that are able to detect and monitor threats to livelihoods. These early warning systems should integrate with broader food analysis systems including the monitoring of available and affordable nutritious food at the local level.
- b) States should invest in disaster risk reduction measures that benefit those most at risk or most in need. In particular, productive assets should be protected from severe weather and climate impacts in a way that strengthen the resilience of affected populations and their ability to cope with shocks from conflicts, climate change or natural disasters. Measures include social safety nets, investment in protecting fragile livelihoods, emergency fiscal and food reserves, the reduction of transaction costs, and the identification of platforms for integrated interventions. States should encourage local procurement and the use of local organizations in the implementation of humanitarian food assistance and livelihood programmes to support economic recovery and development, to strengthen sustainable local food systems and to foster the ability of smallholders to access productive resources and markets.

PART 4 - IMPLEMENTATION AND MONITORING OF THE USE AND APPLICATION OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION

44. All CFS stakeholders are encouraged to promote at all levels within their constituencies, and in collaboration with other relevant initiatives and platforms, the dissemination, use and application of the VGFSyN to support the development and implementation of national policies, programmes and investment plans across all sectors. States are invited to promote the use and implementation of the VGFSyN through coordinated and multi-sectoral policies and interventions, ensuring that activities of different ministries converge toward the promotion of sustainable food systems that enable sustainable and healthy diets and improve nutrition.

45. The VGFSyN should be used to foster dialogue between different actors across sectors, ensuring that all relevant stakeholders, including representatives of the most nutritionally-vulnerable groups, are involved and engaged, and promoting policy coherence while avoiding duplication of efforts.

c)

46. The VGFSyN should be used to influence policy discussions within existing regional and national multistakeholder mechanisms, including national councils, as well as the design of food and nutrition strategies. Effective actions at cross-sectoral level should be promoted through coordinating mechanisms above individual ministry level.

47. Development partners, specialized agencies of the UN, and regional organizations are encouraged to support voluntary efforts by States to implement the VGFSyN. Such support could include technical cooperation, financial assistance, the provision of evidence-based policy advice, institutional capacity development, knowledge sharing and exchange of experiences, and assistance in developing national policies.

48. Donors, financing institutions and other funding entities are encouraged to apply the VGFSyN when formulating their policies for loans, grants and programmes to support both right holders and duty bearers' endeavors. The VGFSyN should contribute to the design of nutrition-sensitive investment that aims to increase the production, affordability, and access to diverse and nutritious food, as well as to promote the integration of nutrition and health dimensions into agriculture and food sector investment plans.

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49. The VGFSyN should support the implementation of the UN Decade of Action on Nutrition 2016-2025 with the objective to increase the visibility, coordination and effectiveness of nutrition actions at all levels, as key aspects toward the realization of the SDGs by 2030. The implementation of the VGFSyN is expected to contribute to the achievement of the six Global Nutrition Targets (2025) endorsed by the WHA in 2012 and its diet related NCD targets.

50. The intention is to support countries in making “SMART” commitments²³ and achieving nutrition objectives as well as the creation of informal coalitions of countries as a way to accelerate and align efforts around specific topics linked to one or more action areas of the Nutrition Decade. This can be done through advocating for the establishment of policies and legislation, allowing the exchange of practices and experiences, highlighting successes and lessons learnt, and providing mutual support to accelerate its implementation.

51. Multistakeholder platforms, partnerships and frameworks at local, national, and regional levels, and across multiple sectors, have to be established or strengthened as a key element contributing to reshaping and promoting sustainable food systems for improved nutrition. Particular attention should be paid to those partnerships and platforms that are already promoting multistakeholder efforts for improved nutrition at country level, such as the Scaling Up Nutrition (SUN) Movement. Actions should be taken to improve partners’ capacity to design, manage and participate in these partnerships, to ensure transparency and accountability and promote good governance as a way to ensure effective results. Moreover, actions and synergies should be implemented through the United Nations Standing Committee on Nutrition (UNSCN) which is responsible for promoting policy coherence and advocacy for nutrition throughout the UN system.

52. Efforts should be made to increase the human and institutional capacity of countries to implement the VGFSyN and to identify priorities toward their operationalization at national level. The organization of multistakeholder workshops and training, as well as the development of user-friendly and technical guides, are important to contextualize and adapt the agreed global policy guidance to local contexts.

53. Parliamentarians and their regional and sub-regional alliances have a key role in designing policies, raising awareness and promoting dialogue among relevant stakeholders, and allocating resources for the implementation of laws and programmes dealing with food systems and nutrition.

54. The dissemination and uptake of the VGFSyN should be facilitated through the identification of “champions” that could raise awareness across sectors, and the organization of advocacy campaigns at different levels. CFS provides a forum where all relevant stakeholders can learn from the experiences of others in applying the VGFSyN and assess their continued relevance, effectiveness and impact on food security and nutrition.

²³ In the context of the UN Decade of Action on Nutrition and ICN2 follow-up process, the next step is to translate the recommended policy options and strategies into country-specific commitments for action. These commitments should be specific, measurable, achievable, relevant and time-bound. https://www.who.int/nutrition/decade-ofaction/smart_commitments/en/



GLOBAL DAIRY PLATFORM

Global Dairy Platform (GDP) appreciates the opportunity to submit inputs for consideration by the Committee on World Food Security (CFS) in response to the call for comments on Draft One of the CFS the “Voluntary Guidelines on Food Systems and Nutrition” (VGFSyN). GDP has remained engaged via the CFS Private Sector Mechanism throughout the drafting process, and would like to commend Dr Liliane Ortega, CFS Food Systems and Nutrition OEWG Chair as well as the CFS secretariat for the work done to date. Zero Draft.

GDP, a collaboration of dairy companies, associations, scientific bodies, and other global partners is committed to demonstrating dairy’s positive contribution to global food systems, healthy diets, and sustainable livelihoods.

~~The following responses are offered regarding the Zero Draft and highlight three main topics of importance within food systems: (i) access and affordability for all; (ii) regionally based, culturally informed solutions; and (iii) the importance of both animal and plant-sourced foods in a healthy diet.~~

We wish to acknowledge the number of alterations and, from our perspective, improvements to the document that have been made compared to the zero draft. We recognize the complexities involved in generating a document of this nature on an issue as complex as the global food system.

Issues we believe CFS should consider for inclusion in the VGFSyN include:

- Highlight the importance of agriculture in general and the livestock sector in particular in improving the lives and health of families and communities, and creating opportunities for female empowerment globally.
- Acknowledge the need to develop measurements/metrics to assess the success or lack thereof of various programs recommended in the document (i.e., taxation; front-of-package labelling).
- Provide a clearer definition of what “evidence-based” means to the committee. While experience and cultural issues should be a part of the definition, ensuring that guidelines are science based will make them more consistent with those developed by other international organizations.
- Acknowledge that regional differences exist in global dietary needs, and no one universal diet will positively impact all people. Nutrients that are plentiful in one region (i.e., high quality protein) may be lacking in others, creating greater need, particularly in vulnerable populations.
- Acknowledge the role of the consumer in helping to drive the development and availability of healthy foods and diets. Industry and government play key roles, but companies will generally provide what consumers demand. Requesting and purchasing healthier fare can help to drive change. At the same time, educating and encouraging consumers to purchase healthy, nutrient dense foods is also important.

- Reconcile what constitutes a processed/ultraprocessed food, and how the demand for these products in some regions can stymie efforts to provide affordable, convenient, healthy fare as outlined in the document.
- Acknowledge that recommendations regarding environmental sustainability need to be science-based, and that our overall understanding of these issues is still evolving.

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Additional detailed comments may be found below on the Draft One document.

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1. Does Chapter 1 adequately reflect the current situation of malnutrition and its related causes and impacts, particularly in line with the goals and targets of the 2030 Agenda? What are the underlying problems that currently hinder food systems to deliver healthy diets?

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Overall this chapter captures the majority of the issues that promote/lead to malnutrition. However, there are a couple of issues that could be more fully addressed concerning governmental roles in:

- improving infrastructure that will allow agricultural products to more effectively reach all people in a region, a country, a continent. In regions where poor roads hinder transportation of goods, the best agricultural practices might still not be able to aid the majority of the people in that region.

- taxation and regulation of both domestically produced and imported food stuffs. Government policies on these issues can greatly impact accessibility and affordability, which in turn can influence nutrition/malnutrition status, particularly in many developing countries.

- The chapter focuses primarily on malnutrition from the perspective of the consumer/individual. Very little is mentioned about other aspects of the food system, and the roles they can play in battling malnutrition (as well as addressing other SDGs besides hunger/malnutrition alleviation). For example, there are strong data indicating that livestock/dairy production plays a role in poverty alleviation, and that livestock ownership in developing countries improves nutritional outcomes for individual owners and those with whom they work.

(Reference "Dairy Developments Impact on Poverty Reduction" <http://www.fao.org/3/CA0289EN/ca0289en.pdf>)

2. What should be the guiding principles to promote sustainable food systems that improve nutrition and enable healthy diets? What are your comments about the principles outlined in Chapter 2? Are they the most appropriate for your national/regional contexts?

- The document indicates that guidelines need to conform to regional customs, beliefs, cultures, etc. In that regard, more can be said to differentiate the health/nutrition needs of people in developed vs. developing regions. Animal proteins (like most foods) may be overeaten in certain developed countries but the nutritional value they offer can help in the reduction of malnutrition in the developing world. The need for a more localized approach to nutritional practices should be accentuated more in the document.

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•—— The Guidelines point to the need to provide evidence-based information to stakeholders. It would be helpful if the committee outlined what constitutes “evidence-based”; will all published scientific data be considered as adequate evidence? Will certain types of research be stressed? Will research carried out in one geographic region be used as evidence that drives guidance in other regions? Who gets to choose the validity/suitability of studies used to generate guidance? What happens when there is a lack of scientific evidence? Finally, sustainable food system guidance is sometimes driven by emotional/anecdotal information, rather than science-based data. To what extent, if any, will this sort of information be viewed as “evidence?” It is imperative that policy-driven decisions be based on sound science and data gathering.

•—— The Guidelines acknowledge the complexity of food systems (paragraph 20). However, per the HLPE Report of Food Security and Nutrition (Oct 2017), food systems encompass a broad set of activities including the production, processing, distribution, preparation and consumption of foods; the Guidelines barely address a number of these issues, focusing primarily on the consumption of foods at the individual level. We encourage the committee to expand the coverage of these important issues.

•—— In paragraph 24, innovation, technology and infrastructure are listed as three main drivers that will aid in implementation of the Guidelines. All these functions require financing. Who will pay for this? Consideration of the financial aspects of the Guidelines and how governments as well as the private sector can be integral seem warranted.

•—— The definition of a healthy diet (paragraph 32) has a Western/developed world slant:

•—— Such guidelines have long stressed reduced consumption of dietary fat, sugar, and salt, and more fruits, vegetables and whole grains. Some data support this guidance (though not universally), particularly in Western populations. But what about in countries that for various reasons struggle to produce enough nutrient dense foods to satisfy their population demands, and those that import agricultural products, making animal proteins, fruits, vegetables, etc. less available or less affordable? What about people in hot regions who perspire more and may benefit from an increase in electrolytes (sodium, potassium) in their diet, or people who receive inadequate calories to support their energy needs who can benefit from added fat (and, yes, maybe some added sugar

as well) in their diets? In this regard, more and more health experts are stressing the need for healthy dietary patterns, rather than focusing on individual nutrient targets.

(Reference: Astrup, A et al. BMJ 2019;366:4137 doi: 10.1136/bmj.l4137 (Published 3 July 2019))

•—— It is understood that these Guidelines are meant to be somewhat general and cannot cover the specific needs of individual demographic groups. However, by “laying down a marker” as to what constitutes a healthy diet, the Guidelines do not fully acknowledge the diversity of needs of people around the world based on economics, availability, lifestyle and cultural norms. Ideally, the Guidelines will allow for and encourage the definition of “healthy diets” to include countries’ own national dietary guidelines instead of solely being defined by a narrow set of indicators.

•—— The document largely omits the need for potable drinking water/fluids globally. The committee highlights daily needs for energy, vitamins, and minerals. But in many regions, one of the most pressing

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nutritional need is adequate, safe, fluid intake. Beverages such as fluid milk can serve numerous nutritional needs (energy, fluids, vitamins, minerals, protein) and should be acknowledged in the document.

3. In consideration of the policy areas identified in Chapter 3 and the enabling factors suggested in paragraph 41 of the Zero Draft, what policy entry points should be covered in Chapter 3, taking into account the need to foster policy coherence and address

policy fragmentation?

•—— The three primary entry points: supply chains, food environments, and consumer behavior seem all-encompassing. However, the factors outlined to help improve nutrition should be more balanced; there seems to be an undercurrent that favors plant-based rather than animal-based agriculture. For example, in paragraph H (Food Supply Chains), the document reads as follows:

▪—— *“Investment in research and innovation for commercial development of nutrient-dense foods and crops, such as fruits, vegetables and legumes, and bio-fortified crops, could lead to improvements in productivity enabling better access to healthy diets and nutrition while minimizing their environmental impact.”*

▪—— Research on animal production practices is clearly omitted. Why is that? If developing nutrient-dense diets is truly the aim here, more research on livestock production seems warranted as well.

▪—— The document also neglects to consider the important role of livestock in a circular economy. In many countries, livestock provide draft power and are the primary source of fertilizer for crop production. Livestock also consume the byproducts from crop production and from the processing of plant produce for human edible foods. Additionally, livestock can graze and consume grass, straw and other biomass from marginal lands which is inedible by humans and as such convert this to highly nutritious human-edible food stuffs.

▪—— While the document does mention that diverse food production (animal and plant) can serve as a hedge against global disasters (drought, famine, conflict, etc.), it could more definitively discuss the resilience of livestock against storms, floods, etc. While severe weather can potentially wipe out a crop for a season or longer, animals can be moved to shelter, fed alternative feed, etc., and better withstand climatic hazards that can devastate crops. Further, in times of conflict, livestock are mobile and can be moved with their owners.

▪—— Finally, seeking ways to incentivize farmers to adopt new innovations and technologies should be highlighted as a means of increasing productivity and promoting more sustainable food production.

4. Can you provide specific examples of new policies, interventions, initiatives, alliances and institutional arrangements which should be considered, as well as challenges, constraints, and trade-offs relevant to the three constituent elements of food systems presented in Chapter 3? In your view, what would the “ideal” food system look like, and what targets/metrics can help guide policymaking?

▪—— Encouraging an environment where all stakeholders, including farmers, the private sector, government, and academia have a seat at the policy table to assist in the development of a nation’s guidelines will help to strengthen the final product in most cases.

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• Enhancing outreach and extension services to farmers, providing them with information and access to innovative production techniques and education about best practices, will enable farmers to improve yield and the environmental and economic sustainability of their farms.

• More public/private initiatives should be considered. Engaging industry as a part of the solution rather than viewing it as a part of the problem would spur more investments in research and technology, among other things, and hasten progress.

• Seeking alliances between government agriculture departments, universities, and industry can provide opportunities for more, larger grants to students and faculty to conduct targeted research on healthy crop and livestock production. Some programs like this do exist, but not enough.

• Alliances with companies working on technological solutions to global health problems should be considered. Local solutions to various food production related issues is invaluable, but an acknowledgement that high tech, futuristic solutions are and can be developed to solved large scale undernutrition problems should be sought as well.

• Encourage collaboration globally among policy makers by proposing not only set topics for guidelines to consider but also set goals for these guidelines to achieve.

5. How would these Voluntary Guidelines be most useful for different stakeholders, especially at national and regional levels, once endorsed by CFS?

The document can more clearly highlight the complexity of the global food system, and the potential for unintended consequences when we generate policy changes without a complete understanding of the resultant outcomes.

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For example,

• In a nutritionally challenged community which depends on animal protein sources, what would the consequences be if we enact guidelines that would scale back such high quality protein and replace it with a lower quality source derived from plants?

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• What would replace staple foods like potatoes in countries like Peru with a rich heritage of tuber consumption?

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• What are the long term consequences (good and bad) of growing crops organically in regions that have traditionally used pesticides?

~~Every action with respect to global nutrition change can produce another, often unforeseen or unintended outcome. We need to think these issues through carefully before enacting sweeping policy changes. Ideally, countries will make these trade-off decisions based on regional and population relevant science-based information.~~

~~Lastly, governments should be encouraged to monitor and measure the impact of voluntary guideline implementation to ensure they deliver intended outcomes, and not produce unintended consequences~~

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