

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

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1. Collaboration with the private sector

The expression “States and private sector food actors should ...” is used repeatedly in the document. The Guidelines are “intended to be a reference point that provides evidence-based guidance **mainly to governments**, specialized institutions and other stakeholders, including international organizations”. States should be encouraged to collaborate more with private sector and therefore we suggest to write “States, **in collaboration with** private sector, should...”. Public entities need to collaborate more with the private sector, they can not only act side by side but more often in collaboration. Our proposed wording more clearly expresses the need for states to invite private sector to work with them, listen to their views, their advice and experience and to pool resources.

2. Don't encourage informal sector

Smallholder farmers need to be connected to formal sector to be able to develop and grow sustainably. The informal sector will not disappear in the short term, but we believe that the Guidelines should not recommend to actively encourage informal sector.

It is problematic that 3.3.2.b) seem to encourage informal markets: “States should encourage small and medium enterprises to competitively participate in wet markets, local, domestic and informal markets, ...”. If the purpose is to connect farmers that are operating informally to actually connect to formal market by selling to formal small and medium enterprises, it is a good thing, but this sentence can be misunderstood.

In 3.3.2 c) states are encouraged to procure home grown school meals directly from local and/or family farmers: “States should consider promoting home grown school meals, where food served in schools is procured from local and/or family farmers, ...”

This is very risky and not a very efficient approach, not widely used in the school feeding programmes worldwide. The Guidelines should instead encourage states to facilitate that smallholders get included in formal value chains so that they can be suppliers into supply chains that deliver to retail and school meals etc. Smallholders can hardly by themselves fulfil all quality requirements and standards of school feeding programmes or retail sector.

3. Processing/packaging step often neglected

In 3.1.1 b) the words “processing, packaging” should be added after “production”. These steps are often forgotten when short value chains are promoted. It should say “production, processing, packaging, distribution and sale of food”. Many food commodities need to be processed and packaged in one way or the other before being sold. This sentence is referring to private sectors’ role in these different steps of the value chain. It is important to not forget all private sector actors in the processing and packaging of foods.