

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

### United Kingdom

#### General Comments

The UK welcomes this draft and it is generally satisfied with the overall structure of the document.

- Overconsumption and its contribution to obesity should be acknowledged and included.
- The UK remains supportive of biofortification as a strategy to tackle micronutrient deficiencies in certain contexts in combination with other strategies. There is a strong evidence base to support this. The UK would want to ensure all modern biotechnologies can be included within the definition of Biofortification. The UK's overall aims are that robust scientific evidence is followed in any future discussions on defining Biofortification.

#### Specific Comments

Section 1.1., para 10 states that climate change and nutrition are linked, but only reflects negative impact of climate change on nutrition. We propose to add reference to the opposite direction, acknowledging the positive effect of nutrition on resilience to climate change, i.e. that well-nourished people are more resilient to climate change and related shocks.

- Section 1.1., para 12 mentions the negative effect of food systems on the environment but does not make explicit reference to its negative effects on the climate via GHG emissions. Can this still be added?
- Section 3.2.2 Promoting nutrition within agriculture and food production
  - The UK supports point *d) on the access to modern technologies*.
  - GM is devolved and the DA's may not share our views on modern technologies.
  - We are supportive of the opportunities GM could bring for British businesses, consumers and our environment and we want our farmers to have access to the best technology available so they can compete in the world market.
  - The VG are vague on how this will be achieved.
- Section 3.2.3 Improving food storage, processing, transformation and reformulation d) Establish guidance for the use and scale-up
  - Guidance on 'scale up' would not be applicable at this time as we do not trade.
- Under Section 3.3.2., we propose to add as (d) that private sector actors should improve nutrition of workers in their supply chains and their ability to access nutritious foods in or through the work place.
- Section 3.3.3. a) makes reference to input subsidies, access to credit, and tax as the only pricing policies to be considered. We would prefer to phrase the last sentence more openly "This can

be done AMONG OTHERS through...” Also, it is unclear what is meant by access to credit – for whom? Credit is not mentioned anywhere else in the following points (only grants to farmers).

- Section 3.3.3. b) refers to grants and subsidies to farmers as the only two financial instruments. Why no others?
- Section 3.3.4 Monitoring new technologies and trends for healthy diets c) *With regards to environmental suitability, states should understand, scrutinise and govern new food technologies (...Biofortification) through CODEX standards....*
  - We already abide by Codex standards.
- Under Section 3.4.2., we propose to also add the role of private sector actors in providing nutrition education to their workforce / workers in their supply chains.
- In the following excerpt on p. 13: “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 highly-processed food have associations with unhealthy diets, overweight and obesity”:
  - As certain nutrients evaporate quickly without appropriate storage (e.g. dark packaging is needed to preserve Vitamin A content in dried maize, cassava, etc), **an additional example worth highlighting** is: “Such technologies could include flash and solar drying, converting food to pastes and spreads, **appropriate packaging to preserve nutrient content** and fortification through conventional on farming breeding of staples and oils...”
  - **Please note a factual error:** the same passage should read “...**bio**fortification through conventional on farming breeding...”