

WFP's Inputs to Draft One of the CFS Voluntary Guidelines on Food Systems and Nutrition (VGFSyN)

General comments

WFP is extremely pleased with the development of the VGFSyN and its current shape. We are also very pleased with the inclusion of a section fully devoted to "Food Systems and Nutrition In Humanitarian Contexts".

As stressed various times during our OEWG meetings in 2018 and 2019, we believe that these Guidelines constitute a unique opportunity to promote systemic and comprehensive policies to strengthen food systems in response to climate-related shocks and humanitarian crises.

Specific comments and suggestions

- 1) With regards to section 1.1.1 - while there is a vicious cycle with malnutrition contributing to decreased work productivity which impacts food security - we would suggest rephrasing "This represents a major impediment to achieving global food security" in "food insecurity is a driver of malnutrition".
- 2) In section 1.1.2, the sentence "While wasting ... cognitive development" suggests that the effects of wasting and stunting are very distinct. Rather, they share some common effects. Both are risk factors for illness and mortality (to varying degrees depending on the severity and if affected by one or more types of malnutrition).
- 3) In section 1.1.2, second sentence, we would propose the following **addition**:
"... 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, **more likely to become malnourished** and are predisposed to higher risk of contracting non-communicable diseases (NCDs)".
- 4) At the end of the same section (1.1.2), we would suggest adding a footnote referencing the latest prevalence data on child malnutrition:
"149 million children under age 5 are too short for their age, 49.5 million children do not weigh enough for their height, 40 million are overweight".
- 5) In section 1.1.3, we would suggest the following **additions** and **revisions**:
"Micronutrient deficiencies related to the inadequate intake of iron, vitamin A, **iodine**, folate, vitamin D and zinc, **amongst others**, affect a large proportion of the global population with serious consequences on health, well-being, and development. Children under five, adolescent girls, women of childbearing age, and pregnant women have specific nutritional requirements **across at their respective stages of the** lifecycles and are at risk of being affected by anaemia, in particular iron deficiency anaemia".

- 6) With reference to section 1.1.5, last sentence (*“These diseases lead to higher spending on health care, putting significant burdens on national health care systems and economies”*), we would suggest acknowledging the strain that diseases pose to economies, social protection and health care systems as they drive people into the vicious trap of poverty, hunger and malnutrition.
- 7) With regards to section 1.1.7 (...*“These limit the capacity of national governments to ensure the provision of essential social services and the delivery of health care”*...), we would suggest highlighting that governmental capacities may fall short to ensure the establishment of robust social protection systems and provisions that help to directly provide or tear down the barriers that individuals and households face to access, use and benefit from essential social services, including health-care.
- 8) In section 1.1.8, it would be important to acknowledge that even those who are socially privileged may be adversely and disproportionately affected by malnutrition due to disabling environments, where unhealthy foods are fast, cheap and easy to prepare or acquire. These Guidelines would need to make the case for making the right to food and healthy nutritional diets a universal centrepiece of social policy.
- 9) In section 1.1.24. c), we would suggest adding: (...) *“social protection, health and food policies and regulatory frameworks”* within the political and economic factors listed. Not only the food policies are determinant of the food systems’ outcomes on FSN, but the broader health and social policies (including social protection, education, etc.).
- 10) Concerning section 2.2.34 e), we believe important to have gender equality and women’s empowerment as a guiding principle but, at the same time, it should be acknowledged that gender norms are not the only types of social norms that define social inequalities. We would therefore suggest adding an additional principle on Social Inclusivity in line with SDG10 where women are not singled-out and we move from gender-specific to gender-sensitive and intersectional approaches, where various social identity makers (race, ableism, ethnicity, literacy, age, sexual orientation, religious and political affiliations, etc.) are considered simultaneously as they create compounded and aggregate disadvantages.
- 11) In section 2.2.34 f), we would propose the following **addition**:
“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 **and create demand for safe, nutritious foods**. Health professionals, especially, should be trained on nutrition”.

- 12) We believe that section 3.1.1 could include a reference to research and development as well as behavioural change.
- 13) We would suggest rephrasing section (3.1.1), paragraph b) as follows:
“Considering the pivotal role of the private sector across the whole food systems, states should engage and support business to act, invest and innovate in responsible, sustainable actions and operations to improve nutrition”.
- 14) We would suggest broadening the scope of section 3.1.2 to “Promoting policy coherence by integrating **food security and** nutrition into national development”.
- 15) In section 3.1.2, paragraph c), we would suggest including social protection among the listed sectors.
- 16) In chapter 3.2, we would suggest adding a section that highlights the symbiotic relation between social protection and nutrition, titled “Delivering food security and nutrition through social protection systems for the most vulnerable”:
- States should ensure the enhanced food security and nutritional outcomes of social protection for the most vulnerable by considering the adequacy, comprehensiveness and coverage of benefits. The adequacy of benefits should be based on the assessment of dietary age-related needs and the functioning of markets to meet those requirements both in terms of quantity, diversity and balance of food. The coverage of social protection systems should be informed by food-insecurity and nutritional vulnerabilities of the populations in consideration of the economic, social and spatial barriers to access, use and equitably benefit from state-led schemes and comprehensive social basic services, such as health and education, that determine individual’s nutritional status.
 - States should ensure that social protection systems and interventions abide to a no harm principle by promoting the double duty action by which benefits and transfers provided do not inadvertently increase the likelihood of a form of malnutrition by focusing to address a specific one separately. School meals, public works and (conditional) cash transfers programs, in particular, should be designed and implemented by States and its partners with a deliberate commitment to do not unwittingly increase the nutritional vulnerability of individuals during the provision of assistance or in the long-term as a result of unhealthy diets and activities promoted to support the development and consolidation of food systems.
 - States should aim at enhancing the resilience of food systems in the face of shocks and climate change by strengthening and considering the responsiveness and flexibility of social protection systems in place to expand their coverage and size of benefits. The later to attend populations facing food insecurity and likely to resort to negative coping strategies to supply for the bare minimum necessities, including nutritious food.
- 17) Section 3.2.3 could mention consumer advocacy and awareness raising on sustainability. In this section, there could also be more emphasis on the reduction of food loss and waste.

18) Section 3.2.4 could mention fair re-distribution of income across the value chains of key agricultural products.

19) We would suggest that a stronger reference is made to the promotion of increased value chain efficiency and value chain inclusiveness/fair pricing for food producers, by adding the following subsection under chapter 3.2, ideally after section 3.2.4:

Making value chains efficient and inclusive

- a) States and private sector actors should ensure that value chains for nutritious food become better integrated and more efficient, with increased service provision (e.g. agricultural extension, inputs, financial services, market information) to smallholders and local producers;
- b) States should promote increased inclusiveness of value chains and markets and reduce inequalities in bargaining power, ensuring that transactions between different actors along the value chain happen under fair conditions.

20) Paragraph b) in section 3.2.6 includes a list of interventions in which we suggest adding “shock responsive social protection”. Section 3.2.6 could also mention investing on research of technical solutions for climate adaptation of crops.

21) Section 3.2.7 could mention Social and Behaviour Change Communication (SBCC) campaigns on food systems best practices targeting youth and schoolchildren.

22) As regards section 3.2.7, WFP Youth Network believes that it is imperative to acknowledge and support the vital role that youth can play in the fight against hunger and malnutrition, representing the main actors in the field of food security and nutrition. Not only should governments invest in their skills and provide them with adequate resources to realize their full potential, but they should also ensure to incorporate their views and needs within programmes and policies by fostering their participation in decision-making processes. Therefore, we would suggest the following **changes** and **additions** to section 3.2.7:

b) States and private sector food actors should **provide invest in** 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 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. ***In this regard, States should consider the establishment of resource hubs with the aim of identifying, developing and supporting youth productive projects or innovation projects around agriculture, business, technologies and social enterprises.***

d) States should capture youth voices and views within policies, by encouraging youth participation (e.g. in the form of elected youth representatives) during policy discussions and at fora that seek to address the problems related to food security in the society.

e) States and private sector should establish strategies to encourage innovation and youth participation as main actors in the field of food security and nutrition and linking them to vocational training, livelihoods and income generation activities; in particular, in countries experiencing high rates of youth migration (internal and/or external), as this critically affects the quality and quantity of workforce in the agriculture and food production sectors.

23) Section 3.3.1 could mention the prioritization of food access in infrastructure investments.

24) WFP strongly supports the reference to home-grown school feeding (HGSF) in the VGFSyN. We believe that there is room for strengthening the language relating to HGSF in section 3.3.2, paragraph c) by considering the addition of the following:

Home-grown school feeding programmes can not only tackle food insecurity for school age children but provide income benefit at large to communities that may be affected by economic slowdown which in turns increase their purchasing power and improve spending behaviour and eventually in food consumption, ultimately having positive effect on food security and food systems and nutrition.

With the schools as reliable markets, farmers can have more income, which they spend in other parts of the economy. As the process continues, school feeding programmes create local income multipliers and spill overs by linking the school feeding programmes to caterers, traders, households, businesses and other activities in the local economies¹.

Home-grown school feeding programmes can create benefits for local economies around participating schools and for the rest of the economies, by stimulating local production activities and raising household incomes and most importantly, ensuring that children stay in school and receive the education they have the right to.

25) Under section 3.3.4, ideally after paragraph a), we would suggest including the following paragraph focusing on the promotion and enhancement of traceability in food supply chains:

States, private sector food actors and development partners should promote and enhance traceability in food supply chains, and leverage on the opportunities that new technologies offer for traceability solutions. Traceability is key to build inclusive, sustainable, safe and nutritious food systems. Enabling an efficient and transparent tracking of food throughout food supply chains, from producers to final consumers, traceability systems can contribute to sustainable economic growth, poverty reduction, environmental protection and promotion of food security.

26) In the same section (3.3.4), paragraph b), we would propose the following **addition:**

¹ Local Economy Wide Impacts Evaluation, Taylor et al., 2016.

“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 **that are affordable to everyone**, display information about food on menus (i.e. calories, and other nutritional content), and adhere to food safety regulations”.

27) On chapter 3.6: we would like to suggest broadening the scope and applicability of the section to encompass ‘fragile contexts’ in addition to the humanitarian ones.

28) We would suggest slightly **rephrasing** the last sentence of paragraph 43 (chapter 3.6) as follows:

“...For those who are already **malnourished** ~~dealing with a malnutrition~~, emergencies can be a tipping point which can **further** exacerbate **the situation** ~~malnutrition issues~~.”

29) We would suggest **rephrasing** section 3.6.1 (paragraphs a, c, d and e) as follows:

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 **with findings used to inform the food and nutrition response as well as any components of the local food system requiring rehabilitation**. ...”

c) States should **recognize nutrition as an essential** need **and** humanitarian **assistance should aim to meet the** nutritional requirements **of the affected population**. **Any** food items provided should be of appropriate **nutritional** quality **and quantity**, acceptable, and can be used efficiently and effectively. ...”

d) States and humanitarian assistance organizations should explore partnerships with industry to ensure **protein and energy balanced**, micronutrient-fortified food is available through social protection mechanisms and **malnutrition prevention and treatment** programmes **as required**, with improved coverage during times of crisis. States, UN agencies and NGOs should work to ensure **maternal**, infant and young child **nutrition including appropriate** feeding practices are promoted and improved upon during humanitarian crises, **in line with WHO recommendations**.

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 **for all stages of the lifecycle**.

30) We suggest adding the following sentence after the current end of section 3.6.1, paragraph e): “Cash-based interventions can also meaningfully improve nutrition by meeting a household’s range of essential needs other than food, such as health, water and sanitation, hygiene, shelter, education, especially when combined with complementary measures²”.

² In 2016, WFP conducted a study in **Burundi** to compare strategies for prevention of malnutrition. Findings show that the addition of **cash** via cash for assets (CFA) to a blanket supplementary feeding programme can be an effective strategy for preventing acute malnutrition. In the study arm that combined food and cash, global acute malnutrition (WHZ) decreased from 13 percent to 8.2 percent.

Niger: a study in partnership with MSF compared combinations of cash and specialized nutritious foods (SNF) for preventing malnutrition. Cash combined with specialized nutritious food was determined to be more effective than either cash or food alone for preventing acute malnutrition.

Yemen: a study in partnership with IFPRI comparing cash, food and food vouchers for household food security found that, in Yemen, cash had a relatively larger impact on improving dietary diversity.

- 31) In section 3.6.2, paragraph a), we would suggest the following **addition**:
“States and humanitarian organizations should pay particular attention, protection, and facilitate access to nutritious food and nutritional support to **vulnerable and marginalized groups 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”.
- 32) We suggest including reference to “climate information services” in paragraph a) of section 3.6.3. In the same section 3.6.3, we would also like to suggest adding a reference to the role played by access to sustainable energy in making food systems more resilient. Or efforts to achieve Zero Hunger can be strengthened by providing the energy people need for producing, transforming and consuming food, which will enhance both their food security and nutrition.
- 33) We would also suggest including the following two additional paragraphs – d) and e) – in section 3.6.3:
- d) States should aim to restore local food production and market access as rapidly as possible.
- e) States should strengthen food safety policies and actions, ensuring effective participation of all relevant stakeholders, along the entire food chain from production to consumption with the aim of preventing contamination and foodborne illness during crises.
- 34) We would refrain from using the term “natural disaster” as it conveys the wrong message that such disasters happen in nature, while the increasing global average temperature, mainly caused by human-induced green-house gas emissions, is exacerbating those natural hazards which, when impacting vulnerable people, are to be considered disasters. Therefore, we suggest the use of the term “climate-related disasters” throughout Part 3 of the document.
- 35) We suggest including in paragraph 49 (part 4) or following, a reference to the contribution of the VGFSyN to the implementation of the Global Action Plan of the UN Decade of Family Farming 2019-2028.
- 36) We would suggest **rephrasing** paragraph 51 (part 4) as follows:
“Multistakeholder platforms, partnerships and frameworks at local, national, and regional levels, and across multiple sectors, **have to be depending on the local context and needs, can be** established or strengthened as a key element contributing to reshaping and promoting sustainable food systems for improved nutrition. 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~~ **UN interagency coordination mechanisms for nutrition could be leveraged to support the uptake of the Guidelines at the country level.”**

37) Finally, the document already cross-references existing CFS policy guidance (e.g. Framework For Action for Food Security and Nutrition in Protracted Crises) – we would like to encourage the referencing to additional guidance to ensure the document remains lean but at the same time comprehensive.