PART 1 - INTRODUCTION

1.1 BACKGROUND AND RATIONALE

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 security, the realization of the 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.

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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.
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 have a 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 and mortality, stunting, or chronic malnutrition is associated with delays in both physical growth and cognitive development. The co-existence 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.

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, well-being, and development. Children under five, adolescent girls, women of childbearing age, and pregnant women have specific nutritional requirements across their lifecycles throughout the life course and are at risk of being affected by anaemia, in particular iron deficiency anaemia. Also referred to as “hidden hunger”, micronutrient deficiencies increase 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 are very high on societies as it is and are transmitted across generations. Undernourished mothers are more likely to have low-birth-weight babies with higher risk of becoming malnourished children and adults. The effects of undernutrition 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.

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 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

Commented [A1]: Is this statement “with rural areas catching up to urban settings” true for all regions? For adult overweight/obesity is not always higher in urban compared to rural settings. See for example: https://jamanetwork.com/journals/jama/article-abstract/2685153

Commented [A2]: LBW increases the risk of both undernutrition and overweight/obesity

Commented [A3]: I assume this is referring to undernutrition?

With the double burden of malnutrition it is important to differentiate the words.
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 also to the implementation of the 2030 Agenda as a whole.

10. Climate change, agriculture, and nutrition are interconnected. The relationship is bi-directional. Climate change and variability affect 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. The food we eat and the way it is produced are by itself contributing to climate change. Agriculture and food production are major contributors to greenhouse gas emissions and account for large portions of planet’s land and fresh water use.

11. Unhealthy diets are the top risk factor for the global burden of disease and death. They 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 ultra-processed food and beverages, are important determinants of shifts in consumer behavior toward unhealthy diets in recent decades. Such dietary shifts have been associated with increasing prevalence of overweight, obesity and diet related NCDs worldwide. An individual’s food choices have impacts that resonate far beyond themselves: diets Consumption patterns reflect larger systemic issues that impact population, health, sustainability, and justice.

12. Current global food systems, with their excessive production, consumption and waste patterns, are unsustainable. They are inefficient in resource utilization, including land and fresh water, 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 systems can be also characterized by inequitable power concentration and imbalances in resource availability and access, the availability of healthy diets, and the way it is produced, while also contributing to climate change. Agriculture and food production are major contributors to greenhouse gas emissions and account for large portions of planet’s land and fresh water use.

Commented [A4]: Food is one of the causal elements of malnutrition. This sentence is ignoring the importance of improving food environments, and reflects an oversimplification of the causes of malnutrition. Those typically affected by undernutrition are also those who live in conditions with inadequate hygiene and sanitation and lack of access to safe drinking water, as well as access to health services.

Commented [A5]: So, the poor in general? Since the sentence ends with “because of their persistent or temporary poverty” no need to specify “urban” or “rural” poor.

Commented [A6]: How are ‘food chain workers’ define?

Commented [A7]: Missing element is that the food we eat and the way it is produced impacts the climate and climate change. This para should point out that agriculture and food production are major contributors to greenhouse gas emissions and account for large portion of planet’s land and water use.

In this context and referring to para 12, the use of the resources ‘land and water’ could be added in para 12.

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Missing element is that the ‘unhealthy diet is the top risk factor for the global burden of disease and death’. Based on the latest analysis that looked comprehensively at the outcomes in terms of disease, the Global Burden of Disease Study, indicates that unhealthy diet is now the top risk factor for the global burden of disease. It accounts for 11 million death every year. The Global Burden of Disease Study is the most comprehensive worldwide observational epidemiological study to date, that assesses mortality and disability from major diseases, injuries, and risk factors to health. We would like to underline the importance of this study for the VG and that it should be included in the introduction part.

Commented [A9]: The shift towards unhealthy diets goes beyond the ‘shift in consumer behaviour’. There are bigger systemic changes that drive this shift towards unhealthy diets. The current language seems to overemphasize the role of the ‘consumers’ and the ‘individual’, whereas the key point would be that diets reflect the larger systemic changes that happen in the entire food system.
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 ways of working together with adequate policies are required. Action is required to address policy incoherence and fragmentation and its subsequent negative impact on nutrition and health, ones that policies are designed and require coordinated coordination 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) 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 forms. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025) and called upon FAO and WHO to lead its implementation, in collaboration with the World Food Programme (WFP), the International Fund for Agricultural Development (IFAD), and the United Nations Children’s Fund (UNICEF), using multistakeholder platforms.

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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.
such as CFS. Specific attention on nutrition was given by a number of UNGA Resolutions, the UN Economic and Social Council (ECOSOC), the UN Environment Assembly, the World Health Assembly (WHA) and the UN Special Rapporteur on the Right to Food.

17. The VGFSyN are expected to contribute to and complement these international initiatives with a view to promoting policy coherence. They will provide evidence-based informed guidance to help countries operationalize ICN2’s Framework for Action 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, with particular attention to targets 2.1, 2.2 and 2.4. 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 informed guidance mainly to governments, specialized institutions and other stakeholders, including international organizations, on effective policies, investment and institutional arrangements that will address malnutrition in all its forms from a food systems perspective.

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

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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”.
6 Ministerial Declaration of the 2018 High-Level Political Forum on Sustainable Development
7 Ministerial Declaration of the 2019 United Nations Environment Assembly
8 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.
9 A/71/282 “Interim report of the Special Rapporteur on the right to food”
11 SDG 2, “End hunger, achieve food security and improved nutrition and promote sustainable agriculture”.
12 Target 2.1, “By 2030 end hunger, achieve food security and promote sustainable agriculture”.
13 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”.
14 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”.
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 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 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 across multiple sectors and areas of policy that address for example national development priorities, economic policies, and social norms. 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).

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

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) 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.16

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”17.

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”18.

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”19.

### 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.

33. The VGFSyN include a number of guiding principles20 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

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17 HLPE 2017b

18 Adapted from FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome

19 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).

20 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.
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, based on transparent rules of engagement including safeguards against potential conflicts of interest.

d) Healthy people, healthy planet. Promote policies that enhance the livelihoods, health, and well-being 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, 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.

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 and promotes a healthy diet.

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 chains\(^{21}\), food environments\(^{22}\), and consumer behaviour\(^{23}\). They provide a range of actions that States can take to ensure that food systems 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 \textit{sustainable and healthy diets};
- on actions to be taken to ensure \textit{accessibility} of \textit{sustainable and healthy diets};
- on the notion that people are central to nutrition 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.

3.1.1 Building on multi-sectoral actions and coordination

a) States should facilitate an inclusive and transparent 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, the UN, donors and national researchers. This dialogue should cover all dimensions of food systems, including production, distribution, marketing and consumption. 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 facilitating an open dialogue on inclusively with the private sector. Any dialogue with the private sector should be transparent and follow clear guidelines.

\[^{21}\] 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

\[^{22}\] 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
build strategies with clear roles and responsibilities for engagement to safeguard the public interest, recognizing that conflicts of interest and vested interests are well established barriers that prevent action (p. 112, HLPE 2017). Prior to engagement with the private sector, governments should establish governance and accountability mechanisms to better identify, acknowledge prevent and address conflicts of interest (p. 113, HLPE 2017) that improve food environments.

c) States and inter-governmental organizations should encourage increased commitment to action and 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 requiring establishing or strengthening multi-sectoral, multistakeholder mechanisms that oversee the implementation of evidence-based informed 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, and transparent indicators to transparently 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, 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 capacity to manage systematic management of conflicts of interest and vested interests ad and capacity to settle disputes that may undermine public health.

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 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

Commented [A19]: This section needs to also address the need for monitoring policy implementation on a regular basis

Commented [A20R19]: And policy compliance, transparent enforcement mechanisms and complaints procedures.
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 whether food that contributes to sustainable and healthy diets is available, affordable, acceptable, and [safe] 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 that contributes to sustainable and healthy diets necessary for healthy diets. States should encourage the use of ecosystem services which maintain soil biodiversity and nutrient balance, and promote carbon storage.

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 food that contributes to sustainable and healthy diets 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 sylvo-pastoral systems, is conserved and sustainably used.

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.

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.

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.

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 smallholders, particularly within developing countries, to adopt sustainable production practices and to produce diverse crops that will contribute to the availability, affordability and accessibility of food that contributes to sustainable and healthy diets, 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 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.

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 and are sustainable for smallholders.

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 smallholders 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 smallholder 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 and nutritious food to market and for consumers to access those markets.

b) States and private sector food actors, including 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.

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.

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 post-harvest 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 biofortification 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.

Commented [A25]: We would suggest including a notion of foods promoting sustainable and healthy diets in this para.
Regarding the use of ‘nanotechnology’ for packaging, is this linked to food safety?

Commented [A26]: It seems that Fortification is not further addressed in this document.
Fortification should be further specified.

Food fortification should be guided by national standards, with quality assurance and quality control systems to ensure quality fortification. Continuous programme monitoring should be in place as part of a process to ensure high-quality implementation.

Decisions about which nutrients to add and the appropriate amounts to add to fortify flour should be based on a series of factors, including the nutritional needs and deficiencies of the population; the usual consumption profile of “fortifiable” flour (i.e. the total estimated amount of flour milled by industrial roller mills, produced domestically or imported, which could in principle be fortified); sensory and physical effects of the fortificant nutrients on flour and flour products; fortification of other food vehicles; population consumption of vitamin and mineral supplements; and costs.

WHO has a number of recommendations on food fortification with vitamins and minerals that are recommended with a clear purpose, such as for example to reduce iodine deficiency, improve the iron status, folic acid and/or Vit A status of populations


Commented [A27]: It is not really clear.

Does it say that States should set guidelines on the extent of processing and protecting nutritional quality during processing?

Or do these guidelines refer to FBDGs that should address limiting the contribution of highly/ultra-processed foods to people’s diet?

Commented [A28R27]: This sentence also seems not to fit under this bullet.
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 enhance food market performance particularly for perishable and nutritious food.

c) States and private sector actors should support smallholders 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.

3.2.5 Improving nutrition and health of farm and food system workers

a) States and private sector actors should ensure that those who grow the world’s food, have sufficient livelihoods to ensure they too can access healthy and sustainable 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 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 and reduce greenhouse gas emissions.

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, extreme price volatility through cover crops, no-till farming, crop and weather insurance, and renewable energy technologies.

d) States should support investment in diverse and nutritious crops and sustainable animal production systems, enhanced storage and marketing, reduced food loss and resilience-focused adaptations. Donors and investors should diversify agricultural investment based on ecological 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 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 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 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.

d) States and civil society should engage and empower youth to make informed decisions for sustainable food consumption via activities such as food and cooking workshops, youth groups and culturally sensitive nutrition education, specifically in relation to food literacy and food-related media literacy. States should encourage and engage youth by involving them in food system policy decision making especially in relation to food environments.

e) States should adopt and implement comprehensive school food and nutrition policies addressing school nutrition curricula, involvement of communities in promoting sustainable and healthy diets in schools, creation of healthy food environment in schools, and supportive school health and nutrition services.

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

Commented [A38]: In line with this heading, referring to the food system, youth should be addressed as well with regard to the food environment and sustainable consumption. We would like to suggest to add a point with this respect.

Related Ref:
1. UNSCN Food environments: Where people meet the food system July 2019
   Pages 102-105

2. OECD forthcoming paper but they have a lot of case studies from regions and countries. Another OECD report on Empowering youth: “Engaging and empowering youth in OECD countries - How to bridge the “governance gap””
   (mainly chapter 5)

There is also a summary report on this (last page has policy suggestions):

3. UNICEF Protecting Children’s Right to a Healthy Food Environment 2019 pages 19-23

4. OHCHR Conventions on the Rights of the Child 1990 (Article 12, Article 17 and Article 29)

Commented [A39R38]: What about adding “adopting and implementing comprehensive school food and nutrition policies addressing school nutrition curricula, involvement of communities in promoting healthy diets in schools, creation of healthy food environment in schools, and supportive school health and nutrition services.”?
illnesses, transmission or contamination of pathogens, naturally occurring toxins, pesticides, antibiotics and heavy metals. Regulations should be adopted and 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 CODEX standards at the national level.

c) States should participate in, and contribute to, the International Food Safety Authorities Network (INFOSAN) 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 pathogenic bacteria, viruses, and parasites, pesticide residues, antimicrobial residues, and chemical contaminants, 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 food that contributes to sustainable and healthy diets

SUSTAINABLE AND HEALTHY DIETS

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

3.3.1 Improving physical access to nutritious food that promotes a sustainable and healthy diet

a) States should ensure people’s physical barriers are minimized to purchase or order diverse types of food that contributes to sustainable and healthy diets nutritious food in a given food environment. This can be done by instituting policies that encourage healthy outlets to populate “food deserts” with markets that sell nutritious, affordable food, and stop the spread

Commented [A40]: This is wording taken from the objective of this document

Commented [A41]: The notion that it is too costly could be made more explicit and that it is often more costly / less affordable than less nutritious foods.

"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
3.3.2 Improving the availability of nutritious food that contributes to sustainable and healthy diets

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

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 and safety 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 public settings and 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.

3.3.3 Making nutritious food more affordable

States should consider strong fiscal policies to promote sustainable and healthy diets. This includes subsidies policies to promote healthier food options, for example of perishable fruit and vegetables, whole grains, legumes, nuts and seeds, and animal source food to ensure they are affordable and competitive compared with highly-processed food (which can be inexpensive but high in added sugars, sodium, and trans-fats and/or unhealthy saturated fats). This can be done through input subsidies, access to credit, and taxation of less nutritious foods.

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Commented [A42]: This should be linked to the introduction of nutrition standards or criteria for food served and sold.... Refers also to section 3.4.3.c

Commented [A43]: I wished the document could refer to the notion of “healthy diet” instead of “nutritious food”. Ideal would have been “healthy food” but I understand there is some resistance to that. Could this be replaced by “food that promotes healthy diets”?

Commented [A44]: Foodbank is not an institution, therefor better to add ‘public settings’....

Commented [A45]: A pricing policy includes price caps, price promotions (at point of sale level, etc.). In this para you are talking about subsidies, which is a fiscal policy.

Commented [A46]: What animal sourced foods are the authors referring to? And to which situations or scenarios is referred to?

Commented [A47]: Either “sodium and unhealthy fats” or “sodium and trans or saturated fats”

Commented [A48]: If the access to credit is provided through government funds this is considered a subsidy

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\^ The term “food swamps” described areas where there is an overabundance of less nutritious food but little access to nutritious food. HLPE 2017b.
and beverages. This also includes taxation to reduce unhealthier food options, such as, on foods high in sodium, free sugars and saturated fats or trans fats, or removing industry tax benefits for the development and marketing of unhealthier foods. Tax revenues can then be used to finance the subsidies on healthier options, and health promotion programmes, including the provision of clean, safe water available in public settings.

a) States can be instrumental in reducing the prices of nutritious healthier food options by helping farmers reduce their production costs. This can be accomplished through grants, subsidies and non-financial support services to reduce inefficiencies and promote value of nutritious food in the supply chain.

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 and sales of nutritious food products that contributes to sustainable and healthy diets 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.

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 highly-processed food high in sodium, sugars and fats, 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 or making clean, safe water available in public settings.

d) States 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.

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 (right-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
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 nutrition breastfeeding and complementary feeding, taking into consideration cultural and social norms and adapting to different audiences and contexts.

c) States, civil society community leaders, social workers 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 ensure packaging and, nutrition labelling, including and nutritional and health claims follow national regulations, in line with Codex standards. Labels are easily understandable, and such products are is convenient for people to prepare, cook and eat.

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, economic, ecological and environmental drivers.

b) States should develop nutrition standards and regulations to restricting the marketing of food and non-alcoholic beverages to which children are exposed. Food marketing regulations should include advertising, promotion and sponsorship of foods high in sodium, free sugars and fats, and include digital marketing. The regulation should protect children aged 18 or younger 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 regulate -nutrition labelling and consider easy-to-read front-of-pack labelling, to promote healthy diets. The front-of-pack labelling (FOPL) system should be aligned with national public health and nutrition policies and food regulations, as well as relevant WHO guidance and Codex guidelines. The front-of-pack labelling (FOPL) system should comprise an underpinning nutrient profile model that considers the overall nutrition quality of the product or the nutrients of concern for NCDs (or both). Evidence-informed metrics such as

Commented [A58]: This reads unclear. It includes several elements that should be split out separately.

Commented [A59]: See our proposed edits to put more clarity in this. However, we would suggest deleting this all together. This can be a very mis-leading bullet in itself – as it can be interpreted with a lot of nuances that enable the promotion of ‘packaged’ (highly processed) food, which may have added nutrients, but not be healthy.

Commented [A60]: This language could be more direct and stronger …

…“States should implement the full set of WHO recommendations on the marketing of foods and non-alcoholic beverages to children. This should include a ban all forms of advertising and promotion (including digital marketing) of foods high in fats, sugars and/or salt to children and young people aged 18 years or younger.” …

E.g. WHO/EURO:
UNICEF:

Commented [A61]: You could add the reference to the 2019 WHO Guiding principles on front-of-pack labelling (FOPL)

Commented [A62]: This should refer to simplified front-of-pack labelling. Codex and WHO are producing guidance. This here should not be the place to introduce new, potentially complicated metrics.

Suggested rewording: “States should institute, ideally on a mandatory basis and covering as a minimum all packaged foods, simplified easy-to-read front-of-pack nutrition information or warning labels, based on robust and transparent nutrition criteria. Foods which are indicated as less healthy should not be sold in or near schools.”
overall fat quality (e.g. unsaturated to saturated fat ratio), trans-fats, carbohydrate quality (e.g., carbohydrate to fiber ratio), added sugars, and sodium. Complementary policies could be considered for food with warning signs should be regulated food high in salt, free sugars and fat – i.e. not sold or marketed in or near schools and not advertised to children.

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 breast-milk substitutes and of food and non-alcoholic beverages to children. The International Code of Marketing of Breast-milk Substitutes and subsequent WHA resolutions. The Code should be rigorously monitored and enforced, with effective sanctions for Code violations. 

Commented [A64]: Suggest to move point (d) up after (b) – on marketing of FNABs

Commented [A65]: This element should be addressed in a separate point, point (b). See suggestion above. So suggest to delete, and focus here on and strengthen the Code text.

Commented [A66]: Why these nuances…..The State should take action, and private sector should consider taking action…?

Commented [A67]: it seems unclear why to include “chefs” here? It is not clear who this is referring to.

Commented [A68]: why only dietitians? What about public health nutritionists or health workers in general?

Commented [A69]: See page 97 in HLPE 2017: it provides reference to an article that suggests to exclude infant formula industry from nutrition education.

We would be suggesting to be cautious in allowing (or encouraging) private sector actors to implement nutrition education.

Commented [A70]: See comment above

Commented [A71]: Maybe have a separate point on chefs (or as a sub-sentence of another point) but it looks a bit strange to put them together with states and NGOs. And why only chefs? What about caterers, suppliers, vendors, restaurants, etc. Are they all food service providers?

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3.5.1 Recognizing women’s nutritional status and deprivation

Promising improvements in agency, voice and status, and challenging the power relationships that limit women’s wellbeing, ensuring access to financial, technical and biophysical resources have an influence on the family’s nutritional status. In many countries, women make decisions about the household’s diet and, as primary caregivers, they have a significant role in the preparation of nutritious food at the household level, and their roles in agriculture and food production. 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 entry points to empower women and ultimately, improve food security and nutrition.

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. 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.

3.5.3 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 promote communal meal times, socializing around food, the consumption of healthier diets and the need to reduce food waste.

c) States should implement mandatory nutrition criteria for all food served/sold in and around schools, including school meals, vending machines, tuck shops etc. States should link the provision of healthy school meals with clear nutritional objectives and These should 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.

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

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.

Commented [A72]: Is this referring to tertiary schools?

Commented [A73]: This could be strengthened by saying that... “States should implement mandatory nutrition criteria for all food served/sold in and around schools, including school meals, vending machines, tuck shops etc. These should be adapted to the needs of different age-groups, with special attention to the needs of adolescent girls.” The second sentence is making a separate point.

Commented [A74]: ? May need clarification.

Commented [A75]: This could be strengthened, and specific reference to maternity protection be made.

Ref ILO Maternity Protection Convention C183 Recommendation R191 calls for at least 18 weeks of maternity leave paid at no less than two-thirds of previous earnings (100% in R191) provided through compulsory social insurance or public funds.
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 promote 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 healthy diets, nutrition and health.

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.

c) 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 and ensuring that within households, women are the recipients of social protection.

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 decision-making 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 builds 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

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 nutrition assistance (food assistance including supplies for food preparation; promotion, protection and support to breastfeeding and appropriate complementary feeding 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.

c) States should ensure the basic nutritional needs of all 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. In protracted crises, in addition to meeting the nutritional needs, ensure that the humanitarian response does not promote overweight, obesity or diet-related NCDs.

d) States and humanitarian assistance organizations should explore partnerships with industry to ensure appropriate micronutrient-fortified foods are available through social protection mechanisms and for the management of acute malnutrition. Management programmes, ensuring with improved coverage of those in need during times of crisis. States should have an explicit policy on infant and young child feeding in emergencies, and States, UN agencies and NGOs should ensure that such policies (ref: https://www.who.int/nutrition/publications/emergencies/operationalguidance-2017/en/) are implemented and optimal infant and young child feeding practices are promoted during humanitarian crises. 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 foods that are 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 foods and nutritional support to pregnant and lactating women, women of reproductive age and adolescent girls, infants, children under five, the elderly and people with disabilities, as well as people living with HIV and those with infectious diseases, e.g., 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 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 the availability and affordable affordability of nutritious food that contributes to healthy and sustainable diets 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.

c) 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 transparent and open 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.

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 informed 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 investments in nutrition that aims to ensure that the food that contributes to sustainable and healthy diets is available, affordable, acceptable, safe, and of adequate quantity and quality, 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.

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” commitments 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. These have to transparent and with clear roles and responsibilities defined by States. Particular attention should be paid to those partnerships and existing platforms that are already promoting multistakeholder efforts for improved

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27 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-of-action/smart_commitments/en/](https://www.who.int/nutrition/decade-of-action/smart_commitments/en/)
nutrition at country level can be considered, 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 by governments and their development partners including the international organizations, 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 to local contexts, and implement the agreed global policy guidance.

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.

Commented [A85]: This should also say by whom? I would suggest adding some language on the who. I am thinking in particular of the International Organizations. The UN agencies have a shared responsibility in supporting this process, according to their specific mandates.

For example, the World Health Organization has developed and is developing user-friendly tools to help countries to contextualize the global guidelines in selected policy areas and to implement them. These will also be vital for supporting the implementation of these policy recommendations within the wider framework of the CFS VG.

Examples are:
- The regional nutrient profile models that have been developed by the WHO Regional to support countries in their implementation of restricting the marketing of food and beverages to children.
- 5 keys to healthy diet
- Healthy diet fact sheet
- Guiding principles for front-of-pack labelling
- REPLACE action package

New projects underway include:
A toolkit for healthy public food procurement policies. Guidelines (and implementation tools) on healthy diet policy actions (including marketing, nutrition labelling, fiscal policies).