

WWF (World Wide Fund for Nature) Submission

Comments on Draft One – Voluntary Guidelines on Food Systems and Nutrition

General Comments:

Part 1:

We welcome the consequent use of “healthy and sustainable diets” which allows to take on a holistic and systemic food system approach and to strengthen the link between the consumption *and* production of food.

However, under section 1.1 Background and Rationale there are omissions that we consider relevant when taking a food systems approach. The section rightfully mentions climate change as a reality deeply interconnected to agriculture and nutrition, but it does so to mostly mention the impacts climate change has on food and nutrition. We believe this risks establishes early on a narrative focused primarily on adaptation to climate change, omitting the major role of pre- and post-production in the global food system in causing climate change (21-37% of GHGs) missing the opportunity to clarify the drivers and to establish mitigation as a priority as recommended by the IPCC Land Use report and the Paris Accord.

Further, the paragraph in question mentions the link to “agriculture” instead of food systems, thus not including interconnections beyond production (e.g. food waste is omitted). Therefore we recommend substituting the reference to “agriculture” for “food systems”, in alignment with the title of the guidelines. We acknowledge that consumption and waste are mentioned below in Paragraph 12.

The climate emergency is mentioned in a standalone paragraph. However, the unprecedented human-induced biodiversity decline as presented in FAO’s “The State of the World’s Biodiversity for Food and Agriculture Biodiversity Report” (2019), and the IPBES’ “Global Assessment Report on Biodiversity and Ecosystem Services” (2019), is only mentioned in passage bundled with other environmental concerns. While all issues remain important, the critical role played by biodiversity for the production of nutritious food (including agro-biodiversity and including biodiversity in top-soil) deserves, in our view, a more prominent position in this section, ideally through a standalone paragraph.

Alongside, also in Paragraph 12, reference is made to power imbalances in the food sector: “Food systems can be also characterized by inequitable power concentration and imbalances failing to deliver benefits for all.” While we welcome this inclusion, we believe it also deserves a standalone paragraph to raise its prominence as an important issue, as well as to unravel the issue. Furthermore, inequality has been mentioned already in Paragraph 7. Placing a reference to “power concentration and imbalances” and detaching it from the issue of inequality and poverty fails to depict the connectivity of such issue. At least part of the driver of inequality and power imbalances in the food system derives from the unequal benefit sharing (or rather, the unequal value accruing that occurs in value chains).

Part 1 would benefit from a reference to the role of animal-sourced foods, laying out the science-based positive and negative aspects associated to it. Sufficient robust evidence **exists to present this sometimes conflictive reality.**

Under section 1.2 Objectives and Purpose the reference to sustainability could still be strengthened.

Part 2:

We welcome the inclusion of the definition of “sustainable and healthy diets”.

Part 3:

Part 3 is well structured and very comprehensive. The listing of measures to be taken is satisfactorily concrete and specific.

Strengthen sustainability aspect: Most of sub-chapters of Part 3 are missing the “sustainable diets” and the “sustainably produced food”-part. While Part 1 and 2 and substantially improved in this regard and very well reflect the importance of a sustainable food production for healthy diets, this link is not adequately reflected in Part 3 and must be strengthened.

The focus on “States” should explicitly include its different levels of government: in accordance with the principle of subsidiarity, and to avoid possible misinterpretations, the reference to “States”

should be complemented by expressions that include all its levels of government, such as “States from local to national level” or “States including all governmental levels” or a more simple form “all governmental actors”.

Incentives and drivers beyond regulation and legislation: We welcome the consideration of mechanisms to incentivize the private sector and non-state actors for transformations that go beyond state regulations and legislation. These mechanisms are also particularly relevant for countries with weak governments.

Enabling food environment: It is vital that the guiding principles make clear that the responsibility of healthy and sustainable food choices is not entirely at the individual level! The choice an individual can make (or not make) is to a large degree influenced and defined by the food environment (food accessibility, affordability, availability etc.) and the components and dynamics that shape it, including regulation or lack thereof. Moreover; certain actors have greater interests and economic (and other forms of) power to influence food environments, for instance through marketing and advertising, in detriment sometimes of sustainable and healthy diets. The enabling environment, therefore, plays a key role and should be part of the guiding principles. We therefore propose an additional item i) on “enabling food environment” as part of the guiding principles.

Animal-sourced foods: Throughout the Draft One of the Voluntary Guidelines, mostly in Part 3, there are 9 mentions to animal-sourced foods or related concepts. We believe that currently the document lacks more in-depth references and explanations of this complex and at times conflictive element of global food systems. We believe there is sufficient scientific knowledge and evidence available to differentiate the different positive and negative externalities brought on by the production of animal-sourced foods and by its growing consumption trend. In this sense, we miss references of the need for diets to include lower amounts of energy-intensive animal-sourced foods and discretionary foods, particularly those high in fats, salt and sugar, while acknowledging that this is context-dependent, particularly where there are vulnerable regions and populations that rely heavily on animal proteins.

Foods that are derived from threatened species also need to be greatly restricted, to align with relevant international law, and so this should be made explicit. Not all animal-sourced foods are the same in terms of impact on planet (or on human health).

Overall and according to scientific findings, when considering animal-sourced foods in the composition and promotion of sustainable and healthy diets, food systems stakeholders would need to focus on: (a) reducing the global average consumption of animal-based foods, and over-consumption of food more generally; and (b) shifting from high impact, to low impact foods by identifying and promoting environmentally sustainable animal and plant-based sources of nutrients (particularly protein) needed for a healthy diet. And in order to achieve this, we suggest that it is of utmost importance to disaggregate the term “animal-based foods” - for example, into beef, milk, chicken, eggs, pork, fish, seafood, and insects - to help recognize their differing individual environmental and human health outcomes. Unravelling this complex topic will be essential to providing fair, balanced, and effective voluntary guidelines on food systems and nutrition.

Specific Comments:

Part 1:

In **Paragraph 19** which formulates the main objective of the VGFSyN should strengthen the reference to sustainability.

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 [respecting planetary boundaries and] conforming “with beliefs, culture and traditions, dietary habits, and preferences of individuals, in accordance with national and international laws and obligations”¹⁵.

Paragraph 30: We strongly support the definition of “sustainable and healthy diets” based on the FAO and WHO (2019) Sustainable healthy diets – guiding principles. This highlights the systemic perspective on food systems and nutrition and consider the conditions under which food is produced,

processed, distributed and/or prepared. The term “sustainable and healthy diets” ensures conceptually connecting healthy diets to sustainable food production and sustainable food systems.

Part 2:

Paragraph 34, d) we would suggest to go beyond the notion of protection and include the need to restore nature, thus including as follows: “the protection [*and where possible, the restoration*] of biodiversity and ecosystems”.

Paragraph 34, f) Nutrition knowledge and awareness:

The focus should not be limited to nutrition knowledge, but rather cover knowledge and awareness on nutritious and sustainable food (or sustainable and healthy diets) more broadly. Planetary health and human health and their interconnection should be explicitly portrayed.

*f) ~~Nutrition~~ Knowledge and awareness [*on sustainable, nutritious and healthy diets/foods*]:*

Part 3:

Paragraph 37:

- 4. Bullet point: The focus should not be limited to nutrition knowledge, but rather cover knowledge and awareness on sustainable and healthy diets more broadly.

Paragraph 38,

Sub-chapter 3.1.1.:

Some conceptual corrections may be needed here, and the inclusion of references to other interlinked dimensions in food systems. A focus that goes beyond nutrition is also needed. The following suggestions explicit these comments.

a) The term “dimension” related to the food system usually is used to refer to the outcome dimensions (environmental, social and economic consequences). To refer to actions from production to consumption, the preferred term tends to be simply “activities” (see International Resource Panel (2016), or Ingram et al. (2011)). In this sense, it would be adequate to refer to the need to avoid impacts on other outcome dimensions when combatting hunger and malnutrition. Therefore:

a) [...] 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 [, while ensuring no related unintended impacts on other outcome dimensions*].*

b) Beyond the need for private sector companies and States to build strategies that improve food system environments, efforts should be made to enforce current and future commitments and legislation to eliminate or minimize the conversion of natural ecosystems and incentivize sustainable production, including by rehabilitating degraded lands for agricultural production.

Sub-chapter 3.1.2.:

b) not only should nutrition be integrated in environmental and other relevant policies, but also vice versa (i.e. integrate environmental aspects in nutrition policies):

*b) States should integrate food system approaches that promote nutrition in national development, health, economic, [*environmental conservation and restoration,*] 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 track and assess the full cost of addressing malnutrition in all its forms [from a food systems perspective].

c) “States should foster policy coherence across sectors to reduce all forms of malnutrition [from a food systems perspective] These sectors include agriculture, environment, energy, water, sanitation, hygiene, health, education, fiscal policies, trade, investment, and economic and social development.”

Paragraph 39:

Add «sustainable and healthy» diet to be coherent with the wording before:

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

Sup-chapter 3.2.2:

b): There is no need to limit such incentives only to smallholders nor to developing countries. In addition the need to sustainably produce food in order to supply the sustainable and healthy diets part is not adequately reflected. Last, an explicit reference to agro-biodiverse crops, and not only to a diversity of crops more explicitly addresses the issue of agro-biodiversity decline, which has significant influence on the state of nutrition.

b) States [Governmental actors], private sector food actors and development partners should support and incentivize [farmers, with special attention to smallholders,] ~~smallholders, particularly within developing countries,~~ to adopt sustainable production practices and to produce diverse [a diversity of agro-biodiverse] crops, that will contribute to the availability, affordability and accessibility of nutritious [and sustainably produced] food, while enhancing farmers’ income and livelihood.

e): The sustainable diets part is not adequately reflected.

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 [sustainable and] healthy diets for growing urban populations and social cohesion of communities.

Sup-chapter 3.2.3

a)/d) : The sustainable diets part is not adequately reflected. Additionally, a reference to agro-biodiverse foods more clearly manifests the current issue of agricultural biodiversity decline that so importantly is impacting the status of nutrition.

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, [agro-biodiverse,] perishable, safe and nutritious [and sustainably produced] food to market and for consumers to access those markets.

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 fortification through conventional on-farm breeding of staples and oils. States should set guidelines and monitor the level of processing as highly-processed food have associations with unhealthy diets, overweight and obesity **[as well as setting guidelines and monitor the level of unsustainably produced food]**

Sub-chapter 3.2.4 making markets work for nutrition

c) the sustainable diets part is not adequately reflected

c) States and private sector actors should support smallholders to meet safety and quality standards of nutritious **[and sustainably produced]** food that enable them to fulfil demand for the local consumption whilst reaching broader markets and getting higher profits for their products.

Sub-chapter 3.2.6:

d) the sustainable diets part is not adequately reflected. Additionally, a reference to agro-biodiverse foods more clearly manifests the current issue of agricultural biodiversity decline that so importantly is impacting the status of nutrition.

d) States should support investment in diverse, **[agro-biodiverse,]** and nutritious **[and sustainably produced]** 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.

Chapter 3.3

Paragraph 40: the sustainable diets part is not adequately reflected. Not coherent with the title of chapter 3.3. that reads “equitable access to SUSTAINABLE and HEALTHY diets”.

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

Sub-chapter 3.3.1

a)/b)/e) the sustainable diets part is not adequately reflected. In e), in addition, house-hold internal power imbalances as well as vulnerable individuals should be taken into account.

a) States should ensure people’s physical barriers are minimized to purchase or order diverse types of nutritious **[and sustainably produced]** food in a given food environment. This can be done by instituting policies that encourage **[sustainable and]** healthy outlets to populate “food deserts²⁴” with markets that sell nutritious, affordable food, and stop the spread of “food swamps²⁵” by creating robust zoning laws that restrict food retail outlets which sell an overabundance of less nutritious **[and unsustainably produced]** food.

b) States should encourage zoning laws and tax incentives for farmers' markets and mobile food retailers that sell nutritious **[and sustainably produced]** food in low-income areas, and reduce the density of fast-food vendors that sell less nutritious food.

e) States should facilitate access to nutritious **[and sustainably produced]** food for poor households **[and individuals]** through vouchers, cash or food supplement programmes. These programmes could substitute basic staple food (such as rice or wheat flour) with more nutritious **[and sustainably produced]** food in the food basket provided to poor households **[and individuals]**.

Sub-chapter 3.3.2

a/c) the sustainable diets part is not adequately reflected

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

c) States should strengthen public procurement systems by ensuring nutritious **[and sustainably produced]** food is more accessible and convenient in institutions such as schools, hospitals, foodbanks, and prisons. States should consider promoting home grown school meals, where food served in schools is procured from local and/or family farmers, which can have multiple food system benefits by establishing stable markets for producers while serving more recommended, **[sustainable and]** healthy diets to children.

Sub-chapter 3.3.3:

b) the sustainable diets part is not adequately reflected

b) States can be instrumental in reducing the prices of nutritious **[and sustainably produced]** food 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.

c) the sustainable diets part is not adequately reflected

c) States and local governments, in collaboration with consumers' associations, can institute regulations and incentives to help existing food retailers increase the number and variety of nutritious **[and sustainably produced]** food products they sell. This can be done by creating local food policy councils to give residents a voice in how best to improve access to **[sustainable and]** healthy diets in their communities.

d) the sustainable diets part is not adequately reflected. More investment in agricultural research is needed.

d) States should institute tax incentives and other fiscal policies to promote more nutritious **[and sustainably produced]** food in the food industry. This can be done by creating disincentives including excise or sales taxes on less nutritious **[and sustainably produced]** food, ~~such as sugar sweetened beverages and less nutritious highly processed food~~, or removing industry tax benefits for the development and marketing of less nutritious **[and sustainably produced]** food. Tax revenues can also be used for health and **sustainability** promotion strategies including retail, manufacturing, or **[agricultural research]**, agricultural incentives to reduce the price of nutritious **[and sustainably produced]** food.

Sub-chapter 3.3.4 "monitoring new technologies and trends for healthy diets"

The sub-chapter does not adequately reflect the sustainable diets part

3.3.4 Monitoring new technologies and trends for **[sustainable and]** healthy diets

*a) States and researchers should understand the influential roles of the internet, social media and online shopping on the access to **[sustainable and]** 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 **[and sustainably produced]** food options, display information about food on menus (i.e. calories, and other nutritional content), and adhere to food safety regulations.*

Chapter 3.4

Paragraph 41: the main focus is on nutrition. Rather, this should be broadened to knowledge and education on sustainable and healthy diets.

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

In **Sub-chapter 3.4.1** "Putting people at the centre of nutrition knowledge, education and information" the sustainable diets part is not adequately reflected:

*b) States should use the best scientific evidence to promote education and knowledge of **[sustainable and]** healthy diets, physical activity, food waste and safety, adequate breastfeeding and complementary feeding, taking into consideration cultural and social norms and adapting to different audiences and contexts.*

*e) Private sector actors should increase the acceptability of nutritious **[and sustainably produced]** food by producing and marketing packaged food of this kind in a way that is convenient for people to prepare, cook and eat.*

In **Sub-chapter 3.4.2** "Utilizing policies and tools to increase knowledge, education and information" the sustainable diets part is not adequately reflected:

*e) Private sector food actors should consider the design of food markets, restaurants and other places where food is sold or served to shape nutritious **[and sustainably produced]** food choices and decision making. Incentives, sales and discounts should be put into place that encourage the placement and promotion of nutritious **[and sustainably produced]** food products in retail spaces.*

*g) States should consider the inclusion of nutrition **[and sustainability]** information within agriculture extension technical packages as a way to support producers in increasing the production of high nutrient density crops and crop diversification. States should consider the inclusion of sustainable agricultural production information within nutrition extension.*

*k) States should draw on the knowledge, experience and insights of individuals who are not usually regarded as members of the nutrition community - e.g. community leaders, chefs, supermarket buyers, influencers on social media, youth leaders, young entrepreneurs, mayors and local communities - in the development of multi-component, community-based media campaigns promoting nutrition education and the benefits of **[sustainable and]** healthy diets.*

In **Sub-chapter 3.4.3** “Promoting “hubs” for nutrition knowledge, education and information” the sustainable diets part is not adequately reflected:

*b) States should support school and worksites to serve nutritious **[and sustainably produced]** 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 more **[sustainable and]** healthier diets and the need to reduce food waste.*

*c) States should link the provision of healthy **[and sustainably produced]** school meals with clear nutritional objectives and be adapted to the needs of different age-groups, with special attention to the needs of adolescent girls. Policymakers should review education curricula to incorporate nutrition education principles, while adopting practical teaching tools such as school gardens and culinary lessons, and providing technical support to help schools implement changes.*

Chapter 3.5

In **Paragraph 42** the sustainable diets part is not adequately reflected

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

Sub-chapter 3.5.2

In **b)** the sustainability aspect is not adequately reflected

*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 **[sustainably produced]** 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 **[and sustainably produced]** food.*

Part 4:

In **Paragraph 48**, the sustainability aspect is missing. Additionally, a reference to agro-biodiverse foods more clearly manifests the current issue of agricultural biodiversity decline that so importantly is impacting the status of nutrition.

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

In **Paragraph 50**, the sustainability aspect is missing

*50. The intention is to support countries in making “SMART” commitments²⁷ and achieving nutrition **[and sustainable agriculture and food systems]** 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.*

Paragraph 51 (second sentence): mention multi-stakeholder platforms in the sustainable food system area, not only SUN movement as a multi-stakeholder initiative from the nutrition sector.

*51. Multistakeholder platforms, partnerships and frameworks and 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. Particular attention has to be paid to those partnerships and platforms that are already promoting multistakeholder efforts for improved nutrition **[and sustainable food systems]** at country level, such as the Scaling Up Nutrition (SUN) Movement, **[the One Planet (10YFP) Sustainable Food Systems (SFS) Programme and others]**. 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.*

Reasoning: Currently the paragraph speaks only of Nutrition and not of Food Systems. There are many multi-stakeholder platforms that are more broadly based (= food systems). **The One Planet (10YFP) Sustainable Food Systems (SFS) Programme is a global multistakeholder initiative on sustainable food systems:** The SFS Programme promotes policy coherence in the field of sustainable food systems, and thus including nutrition. Through the 10YFP – which has a Rio+20 heads of State mandate and has been recognized as an implementing mechanism for SDG12 (Sustainable Consumption and Production), the SFS Programme reports on a yearly basis to the High-level Political Forum on Sustainable Development of the UN Economic and Social Council. The topic of healthy and sustainable diets is of high importance and relevance in the SFS Programme; it is one of its five cross-cutting focus themes, which guide the Programme towards the achievement of its goal. The SFS Programme promotes an approach that supports diets that are healthy and that fully consider the socio-economic and environmental outcomes of food consumption.