

Comments on the Voluntary Guidelines on Food Systems and Nutrition

The following comments are made jointly by the World Obesity Federation and the Lancet Commission on Obesity.

1) Action on obesity should be prioritised within the guidelines

World Obesity welcomes the new Voluntary Guidelines on Food Systems and Nutrition (*the guidelines*). As highlighted in the background section, malnutrition in all forms is one of the world's major challenges and obesity is rising fast among all age groups. It is estimated that 2.7 billion adults will be overweight and over 1 billion affected by obesity by 2025. No country is on track to meet its obesity targets and urgent action is required to reverse the worrying trends. Obesity also affects children including under 5's, school aged children and adolescents; especially those in low- and middle-income countries where the disease is rising fastest. World Obesity's 2019 Global Atlas on Childhood Obesity found worrying trends in the predicted data if urgent actions in food systems and beyond are not taken.

Recommendation for paragraph 4 of 1.1: add "*Most of the world's population live in countries where overweight and obesity affects more people than underweight, and there is an especially worrying rising prevalence of overweight in school-aged children and under 5's.*"

2) The guidelines are an opportunity to focus on double and triple duty wins

As they currently stand, *the guidelines* arguably fail to sufficiently address the double burden of malnutrition, and the range of interventions that exist to tackle all forms of malnutrition via food and health systems. The Lancet Commission on Obesity report '*The Global Syndemic of obesity, undernutrition and climate change*'¹, of which World Obesity was a partner, explores the interactions between three epidemics we face globally – undernutrition, obesity and climate – and the interconnections between nutrition, agriculture and nutrition. We recommend that *the guidelines* take a more 'syndemics approach' to food systems and nutrition, recognising that the same systems that cause malnutrition in all forms also impact on climate change and thus need for triple win policies, something which would be well received by policymakers looking to address two or three of these overlapping problems. The Global Syndemic report shows, for instance, how some of the same actions to tackle undernutrition can also tackle overweight and obesity, and also beneficial impact climate change too. For example, as both maternal underweight and overweight are associated with poor outcomes, maternal nutrition interventions represent a double win to help prevent all forms of malnutrition in mothers and children. The need to address the double burden was emphasised in a recent WHO-Lancet series², and in the UNICEF's 2019 State of the World's Children report³.

Recommendation for paragraph 5 of 1.1: "*Malnourished (including underweight and overweight) mothers are more likely to have low-birth-weight babies with higher risk of becoming malnourished children and adults.*"

Recommendation for paragraph 6 of 1.1: please add "*The new reality is that undernutrition and overnutrition are interconnected; double-duty actions that simultaneously*

¹ <https://www.thelancet.com/commissions/global-syndemic>

² <https://www.thelancet.com/series/double-burden-malnutrition>

³ <https://features.unicef.org/state-of-the-worlds-children-2019-nutrition/>

address more than one dimension are more cost effective, efficient, and likely to mobilize broader support.

3) Voluntary guidelines should be converted into legal obligations

The current food system is a major cause of the rising obesity epidemic. Guidelines to help shape this system towards better health outcomes are essential. However, based on previous experiences, the voluntary nature of *the guidelines* may be a limiting factor; voluntary guidelines have been shown to be weak levers for change against commercial interests. Legally binding actions, for example those based on human rights legislature, or packaged under a framework convention should also be considered. *The guidelines* should reference obligations in national and international law more explicitly.

Recommendation for 1.3 (para 25) Add line: *“In order to be fully effective the guidelines will need to be converted into law. Voluntary guidelines have shown to be weak levers for change in the current food system where power is not distributed equally between public and private entities”.*

Recommendation for 3.1.2 a): This section should clearly talk about incorporating the guidance into legislation and regulation, national goals and targets, and monitoring systems. For example: “States should align policies that affect nutrition across sectors, ministries and agencies, and ensure that these guidelines are enshrined into new and existing legal frameworks and institutional capacities to ensure impact and protection against commercial interests.”

4) Accountability mechanisms are key

Whether legally binding or not, voluntary guidelines will only ever be as strong as the accountability mechanisms behind them. With or without the law, there is a key role for civil society in ensuring the actions outlined in *the guidelines* are acted on by governments. Echoing other NGOs’ concerns, World Obesity is worried that the conflict of interests is not sufficiently addressed in *the guidelines*, which currently do not fully describe or recognise the challenges around commercial influence. The Lancet Commission on Obesity recognises the need for national policies to be underpinned by Healthy Sustainable Dietary guidelines as a crucial ‘triple duty win’ for addressing undernutrition, overnutrition and climate change; however, their report also notes the failure of guidelines in many contexts to deliver healthy diets, due to pressure from strong food industry lobbies, especially the beef, dairy, sugar, and ultra-processed food and beverage industry sectors. Instituting accountability mechanisms, monitoring and evaluation is not only the responsibility of the State, all actors including the private sector have a role to play in creating a transparent, accountable and democratic food system.

Recommendation for 3.1.3 a): “States should institute strong and transparent accountability mechanisms that pertain to different food system actors, especially those commercial entities whose interests may undermine health and nutrition goals.”

5) Policy coherence and multi-sector actions

The guidelines outline parts of the Global Syndemic narrative (in the rationale) but fails to capture the full concept of an underlying global economic system that is creating wealth for some not health for all. Acknowledging the root causes of the current food system’s failings is essential to the vision: only actions that are based on the idea of sustainable economic prosperity. Policy incoherence is a key concept here. As mentioned above, these guidelines should be focused on ‘triple duty’ governance levers. Recognizing the role of parts of the

private sector in transforming food systems, the goal of reducing commercial influence (for example, marketing to children of unhealthy products) must also be integrated if outcomes are to be improved. Building on multi-sectoral actions and coordination will be essential but “inclusive dialogue” must be managed to ensure vested interests do not influence public policy.

Recommendation for 3.1.1 a): “States should facilitate a range of dialogues and consultations, ensuring the appropriate participation of a range of stakeholders working with or in food systems, including national and international organizations from civil society, indigenous people, the UN, donors and national researchers. All dialogues and consultations should be sensitive to conflicts to interest, ensuring that the policy making process is not undermined by vested interests and that all engagement is in line with the core business models of each stakeholder”

6) Affordability, accessibility and availability of healthy food

These guidelines risk being undermined if healthy and sustainable food options remain less affordable, accessible and available compared to less healthy and sustainable food options. As highlighted in UNICEF’s 2019 State of the World’s Children report, in many countries the healthy option for families is out of reach which exacerbates all forms of malnutrition. *The guidelines* should place more emphasis on the issue of access to healthy foods, and the strategies needed to achieve this, by both government and industry actors.

Recommendation for 3.1.3 a): “States should implement ~~consider~~ pricing policies 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 or unhealthy fats).

7) Transformation is required

In order to shift the food system towards healthier and sustainable models, bold government action is required. Yet, as highlighted by others in the CSM, *the guidelines* fail to address the transformation required at all levels. Despite the aspiration for a systemic approach, the word *transformation* is only mentioned once in the current draft.

General recommendation: add the concept of “transformation” to the guiding principles.

8) Human rights and human experience

The guidelines recognise that “People, both individuals (rights-holders) and members of institutions (duty-bearers), are at the centre of food systems, acting as drivers and experiencing outcomes”. However, focusing on people-centred knowledge is not the same as being truly people centred. No recognition is given to the importance of lived experience in shaping and implementing guidelines.

Recommendation for 3.4: Expand section 3.4 to focus beyond people-centred information, on people -centred implementation.

9) Nutrition education should include food system sustainability components

In order to maximise the potential of citizens' role in transforming food systems, people-centred nutrition education and information should be underpinned by sustainability components. Human health promotion activities such as nutrition counselling should always cover healthy and sustainable diets.

Recommendation for 3.4: All efforts to educate and inform people about nutrition and food systems should reference climate change and the issue of food system sustainability.