**CFS POLICY PROCESS ON THE DEVELOPMENT OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION**

**TEMPLATE FOR SUBMISSIONS**

1. **Does Chapter 1 adequately reflect the current situation of malnutrition and its related causes and impacts, particularly in line with the goals and targets of the 2030 Agenda? What are the underlying problems that currently hinder food systems to deliver healthy diets?**

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| **To the list of sectors listed under item 12, add environment and planning sectors.**  **Paragraph 15** makes it clear that the document is framed around nutrition as the outcome of needed transformations in the food system rather than environmental, economic and social impacts. Assuming this is a conscious decision, it may be useful to make it explicit.  **Paragraph 16:** Why the “particular attention to target 2.2” of SDG 2? I believe SDG target 2.1, access to food, is equally important, and in fact arguably the target most closely associated with the Right to Food. |

1. **What should be the guiding principles to promote sustainable food systems that improve nutrition and enable healthy diets? What are your comments about the principles outlined in Chapter 2? Are they the most appropriate for your national/regional contexts?**

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| **Paragraph 20:** I suggest the following edit:  The Voluntary Guidelines are expected to build understanding of the complexity of food systems with the intention to promote policy coherence, provide actionable recommendations, and foster and guide dialogue among different institutions and sectors.  **Paragraph 36:** These guiding principles are no doubt the result of much discussion and negotiation, so I can only humbly offer my comments. Some of them seem to be more actions than guiding principles, for example nutrition education. Another guiding principle to potentially consider is “Shed light on power imbalances: promote awareness of power imbalances throughout the food system that pose challenges to transformations aimed at improved nutrition and environmental, social and economic sustainability.”  **Paragraph 41:** Similarly, I feel “address power imbalances” is missing from this list of “cross-cutting factors”, e.g. issues related to globalization and concentration of markets, foreign direct investment, and the power of multi-national companies.  **Paragraph 43, item h:** I suggest using “nutritious foods” in place of “nutrient-dense foods”, and I favor excluding “bio fortified crops” (which I presume refers to GMO crops) due to lack of consensus on the wisdom of promoting their use.  **Paragraph 46:** This is not my area of expertise, but the two policy-relevant areas seem very limited, especially in light of all the relevant drivers described in the introductory paragraph. |

1. **In consideration of the policy areas identified in Chapter 3 and the enabling factors suggested in paragraph 41 of the Zero Draft, what policy entry points should be covered in Chapter 3, taking into account the need to foster policy coherence and address policy fragmentation?**

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| The distinction between policy areas and policy entry points is unclear to me.  However, food and nutrition policy governance is key to fostering policy coherence. Ideally, an intersectoral governing body exists composed of empowered representatives of relevant government ministries (Agriculture, Health, Social Protection, Education, Planning) and civil society organizations, as per the example of the National Food Security and Nutrition Council (CONSEA) in Brazil. The CONSEA advised the National Inter-Ministerial Food and Nutrition Security Chamber (CAISAN). Such institutional arrangements promote alignment of sectoral policies and strengthen the link with national government planning and budget processes. |

1. **Can you provide specific examples of new policies, interventions, initiatives, alliances and institutional arrangements which should be considered, as well as challenges, constraints, and trade-offs relevant to the three constituent elements of food systems presented in Chapter 3? In your view, what would the “ideal” food system look like, and what targets/metrics can help guide policy-making?**

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| The institutional arrangement in Brazil, described in the response to Q3, is not new but was very successful, although it has been in legal limbo since a new president took office.  Among the many potential trade-offs to be studied is the possible trade-off between availability of enough nutritious food and environmental sustainability. We are only beginning to understand the environmental impacts of food production, distribution, processing and food loss and waste. However, it is also possible that there are opportunities for synergies – i.e. policies that contribute simultaneously to increased availability of nutritious foods and environmental sustainability.  The discussion of targets and metrics promises to be a challenge. Some of the SDG targets and indicators should be considered, as they are based on valid methodologies and produce indicators that are comparable across countries. But it might be useful to develop a set of recommended indicators that includes internationally comparable indicators as well as indicators that are country-specific and do not need to be cross-country comparable, for purposes of national-level monitoring and policy.  I attended a presentation about a web-based food systems dashboard being developed in collaboration with GAIN, Johns Hopkins University, Michigan State University, University of Michigan, FAO, Tufts University, and University of Washington. A compendium of indicators for monitoring urban food systems policies, developed in the context of the Milan Urban Food Policy Pact, is also expected to be published by the end of the year. FAO’s *Compendium of indicators for nutrition-sensitive agriculture* is also a good reference.  The process of defining indicators is as important as the resulting indicator framework, however; although it may take more time, if the process is characterized by active participation of key stakeholders, the relevance and usefulness of the resulting indicator framework will be increased. |

1. **How would these Voluntary Guidelines be most useful for different stakeholders, especially at national and regional levels, once endorsed by CFS?**

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| The guidelines should be widely disseminated internally in FAO and staff should be encouraged to use them in their work at regional and national levels, helping governments to understand them and apply them in their agriculture, food security and nutrition planning. They should also be broadly disseminated among other development partners, donors, policy communities and civil society organizations. |