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?

CARE aims to tackle the inherent barriers in food systems that prevent people from overcoming persistent and intergenerational malnutrition and poverty. To overcome these obstacles and ensure that no one is left behind, we systematically analyze and work on food system dynamics to help assess how equity impacts and is impacted by nutrition. CARE places particular emphasis on addressing gender inequality.

Fundamentally, hunger, malnutrition, and poverty are not accidents – they are the result of systemic injustices that lead to social and economic inequalities at local to global levels. Unequal relationships in markets, in policy processes, and households – between the powerful and marginalized; between men and women, boys and girls, and among genders – determine who can access resources and who cannot, determining who is hungry and malnourished. Inequality governs who eats first and who eats last, least, and how well. Gender inequality, in particular, is a strong determinant of women’s nutritional status, influencing the roles of and respective labor distribution among men and women as well as the opportunities and resources available to them.

As we work through the various causes of malnutrition, we cannot ignore the rates of overweight and obesity that continue to grow in all regions, and disproportionately affect women and school-aged children¹. Poor quality diets are increasingly leading to compromised human health and are responsible for the unprecedented rise in nutrition-related noncommunicable diseases. The need to regulate the marketing of unhealthy foods, particularly to children, and the role of ready-to-eat foods in diets should be stressed. The environmental impacts of these industrially processed foods, as well as the considerable waste resulting from industrialized food chains, draw from the earth’s finite natural resource base. Paragraphs #10 and #11 speak of supporting the most vulnerable but it is people living in poverty that are most affected by these trends. Since the food supply is driven by market demand, the essential needs of the poor are not determining how resources are used - which foodstuffs are produced, under what conditions and for which markets.

In many countries – both high and low income – agricultural subsidies are disconnected from negative social and environmental externalities, which are key factors in food systems. Farm subsidies too often support a select set of commodities – staple crops – rather than more diversified food production. Unequal power in policymaking processes and vested political interests perpetuate these inefficient

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¹ In 2018, an estimated 40 million children under five were overweight. In 2016, 131 million children 5–9 years old, 207 million adolescents and 2 billion adults were overweight. About a third of overweight adolescents and adults, and 44 percent of overweight children aged 5–9 were obese. The economic costs of malnutrition are staggering. (SOFI, 2019)
mechanisms that, while intended in many cases to ensure support for farmers, undermine other goals of a food system.

We appreciate that power imbalance within our food systems is a sensitive topic but it cannot be ignored if we are to tackle the underlying problems. Governments need to be empowered to counter inappropriate marketing and sale of unhealthy foods, as well as be supported to redirect agricultural subsidies towards diverse and sustainable food production. Agricultural subsidies in the top 21 food producing countries total nearly 500 billion USD, representing an enormous investment opportunity to retool food systems to better support social, environmental, and health – including nutrition – outcomes.

For nearly 75 years, CARE has been fighting poverty and providing humanitarian relief in times of crisis. And in the last three years, the global community has watched the number of chronically hungry people increase, due largely to conflict and climate change. Both issues could be more explicitly discussed in Chapter 1 to reflect the fundamental barrier and threat they pose to food systems that deliver on nutrition. Acute and protracted conflicts are causes for hunger and starvation. Protracted crises make it more difficult to ensure access to adequate, nutritious food – diverse and healthy diets – among internally displaced people and refugees. Climate change will impact all aspects of food security. The most recent IPCC special report, Climate Change and Land, spells out clearly the threat that climate change poses to food systems and nutrition, including potential decreases in the nutritional value of foods. Other research reveals that climate-induced impacts on food production will negatively affect nutrition and health outcomes, leading to as many as 529,000 additional deaths. Malnutrition will also result from climate change impacts on access to clean water, hygiene and sanitation conditions, and poorer health and caregiving practices often due to displacement. On top of these impacts, more frequent and severe natural disasters will increasingly plunge individuals and communities into emergency situations, test their resilience, and push all people further into poverty, especially women and girls.

An inadequate micronutrient supply, whether because of inadequate access or availability or because of a lack of or misleading information on nutritious foods, leaves a third of the world’s population suffering from acute and long-term negative consequences on their health. We must better understand the interactions of acute and chronic malnutrition (wasting and stunting) as well as how to effectively address these. One question we ask is how do we fix the nutrient supply while preserving the world’s biodiversity and halting climate change, fostering development of nations and the most vulnerable – many of whom are food producers themselves?

Finally, to ensure meaningful improvement in nutrition outcomes at a population level, the multidimensionality of malnutrition could also be highlighted further. Cross-sectoral and holistic approaches are essential for meaningful improvement in nutrition outcomes. The intention to apply and implement a multisectoral approach to nutrition has been declared at the highest levels of nutrition leadership. Despite the recognized importance and desire to work multisectorally, the nutrition field has struggled to translate the current evidence base and the collective will into high quality and sustainable implementation and impact at-scale. Awareness of this need has stimulated interest in applying implementation science to nutrition, and a call for research and evidence that advances understanding of how interventions can work in ‘real-world’ setting should be prioritized.
2. 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?

We welcome the inclusion of systemic, holistic approaches; gender equality and women’s empowerment; the twin priorities of healthy people and healthy planet; the inclusion of capacity – both human and institutional as well as knowledge and awareness. We are also pleased to see the grounding of the guidelines in the right to food. However, the principles might be strengthened with the addition of inequality, writ large, in line with SDG10; an explicit reference to resilience, particularly in the face of increasing fragility, protracted crises, and more frequent and severe climate impacts. Further, inclusivity and participatory approaches should underpin the guidelines.

CARE’s She Feeds the World Framework\(^2\) and programming is based on an integrated model, involving interventions that incorporate gender, governance and resilience as a common approach, across six areas of change, each backed with evidence of success, and a range of toolkits and documents behind them. CARE’s vision for a just and sustainable food system is based on SuPER principles. SuPER Food Systems are:

- **Sustainable:** Grounded in healthy ecosystems, stable, accountable and enduring institutions and sustainable financing.
- **Productive:** Increases smallholder farmer’s production levels and the profit earned through intensification that increases returns on investment, including of labor, by farmers, results in nutritionally balanced diets, and is climate ‘smart’.
- **Equitable:** Enables equal rights, opportunities, resources and rewards for poor and vulnerable people, with a special focus on the needs and constraints of women, and supporting access to affordable nutritious food by rural and urban consumers. This includes equality within the household, within communities, and across local and global value chains.
- **Resilient:** Allows individuals, families, communities and systems to be able to withstand shocks and stresses, including climate impacts and other risks.\(^3\)

*She Feeds the World* builds on our 70 years of experience, in promoting an integrative approach to food and nutrition security, that not only promotes access to critical inputs like water, land, seeds and finance, and access to markets, but also includes an explicit focus on nutrition, safety nets and social protection in times of crisis, and puts women’s empowerment at the heart of everything we do.

One indicator of success that CARE has witnessed, especially in our work around *Shouhardo*, is the role of women. The meaningful engagement of women in decision making processes would help because links between food systems and household nutrition and health pass primarily through women. Increasing women’s access to resources and decision-making power is a first step, as well as reducing time and labor constraints.

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3. 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?

Regarding the entry points that are missing, the following suggestions could be considered by the drafting committee:

As mentioned in Q1, there is not nearly enough attention placed on power dynamics around marketing of unhealthy foods and drinks and consumers’ decision-making processes – and this is not limited to developed country contexts. It is not mentioned in Processing and Packaging section (Para 45) at all, although in many developing country contexts, shiny and colorful packaging of ‘snacks’ and ‘juice’ are perceived as better than traditional snacks.

There is a significant need to supercharge small and medium sized enterprises in developing countries to become more transformative for nutrition - making healthier options available and to help reach low income and rural consumers who purchase more food for their consumption than they grow. The private sector also needs to step up its innovations to deal with overweight and obesity challenge, especially in emerging markets. Engaging with private sector stakeholders to tackle food and nutrition security has become an important SDG delivery strategy. There is a call for actors in the food system and nutrition community to enact policies that harness the power of the private sector while protecting consumers.

Again, in Retail and Markets (Para #46), it is not only interactions in stores and markets that shape food systems that influence consumer behavior. The role of the local media, the availability of packaged products with little nutritional value, perception that new/modern is better, etc. all influence consumer behavior. ‘Policies that consider ways to restrict the marketing of….’ is a weak response. This is mentioned on page 16 but narrows the response to the International Code of Marketing of Breast-milk Substitutes and subsequent resolution, and relevant World Health Organization recommendations. Chapter 3 is presented as two separate sections that do not reflect current thinking in what shapes positive behaviors around all aspects of food and nutrition. This should be a much more holistic systems approach (household, community, food/water/health systems/policy, etc.) to how consumer behavior is influenced. For example, Food and Nutrition Education and Information lists SBCC as a policy area limited to ‘messaging.’ In fact, SBC (the C for communication is no longer used as it limits the scope) touches on education and information, social norms, values and tradition, gender dynamics, etc, and Nutrition Education targets schools, mother/child health care/adolescent girls without taking a more holistic approach, and identifying and influencing the other actors in the household, community, schools, markets, health centers, etc.

CARE was pleased to see the role of social protection schemes mentioned under the section on ECONOMIC ACCESS (AFFORDABILITY) but it would also be worth emphasizing financing schemes that empower small holders in Para 46.a. CARE has promoted Village Savings and Loan Associations (VSLAs) for over 25 years to enable women living in poverty to increase their financial skills, gain access to and control over resources, and generate economic opportunities and income. In 2009, CARE set out to scale up VSLAs and has since expanded access to this savings-led, community-based financial solution from an initial one
million members in 2008 to 6.7 million across 46 countries today. These members represent 317,335
groups of predominantly rural, poor women collectively saving and investing over $433 million per year.

With regard to production systems, attention should also be paid to inclusive and equitable access to the
techniques, resources, inputs, etc., among small-scale food producers as well as women and men.

Finally, with regard to policy coherence, it is vital that governments begin moving toward food systems
strategies and policies. Only through a food systems policy, crafted through an inclusive, participatory
process, can governments begin to grapple with the numerous dynamics and factors, outcomes and actors
within food systems. For additional information, see Rawe T, Antonelli M, Chatrchyan A, Clayton T, Fanzo
change: Local to global policy as a catalyst for change. CCAFS Working Paper no. 271. Wageningen, the
Netherlands: CGIAR Research Program on Climate Change, Agriculture and Food Security (CCAFS).

4. 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?

The existing knowledge and data irrefutably assert that we must move beyond nutrition-specific only
approaches to meaningfully tackle malnutrition. Taking into account the global challenges, like climate
change and rapid urbanization, the nutrition community is called to apply a nutrition-centered food
systems lens to sustainably impact malnutrition on an individual and population level. The importance of
the contribution of sectors, outside the traditional health field, to attend to the underlying determinants
of malnutrition is increasingly being recognized. The fact that nutrition programming needs to seek
creative ways to improve food systems, food quality, and nutrition behaviors; integrate nutrition into
other sectors; and change social norms around eating in addition to continuing to implement and scale up
established approaches to improve nutrition is widely understood.

Furthermore, regarding specific examples of policies, interventions, challenges, and trade-offs, a recent
CCAFS information paper, Transforming Food Systems under Climate Change: Local to global policy as a
catalyst for change, discusses these issues and references policy examples from a variety of countries. The
paper also discusses trade-offs, the challenge of inequality, and the importance of inclusive governance
and policy-making processes.

EXCERPT from a brief on the paper:

Feeding and nourishing a growing and changing global population in the face of rising numbers of
chronically hungry people, slow progress on malnutrition, environmental degradation, systemic
inequality, and the dire projections of climate change demands a transformation in global food systems.

1. **Three areas of policy change show potential to be catalytic**: Policy change is particularly
needed to: 1) reduce emissions and increase resilience, 2) tackle food loss and waste, and 3)
shift diets to promote nutrition and sustainability. Regulatory and financial policy and market approaches can enable action at the farm level and promote action across the supply chain. Tackling food loss and waste requires action and policy across the supply chain that addresses the drivers of unsustainable production and consumption. Food systems must respond to climate change and deliver on food and nutrition security. Policies must support diets for both people’s health and planetary health.

2. **Tradeoffs call for a multi-sectoral, food systems approach to policymaking:** Food systems cut across most sectors, demanding mutually reinforcing policies that avoid or minimize duplication or contradiction. A whole-of-government approach enables discussion and negotiation across sectors to inform shared goals and tough choices about priorities.

3. **Inequality in food systems demands transparent, inclusive policies and processes:** Inequality in food systems shapes who is hungry and malnourished and who is vulnerable to climate change. Policy must address inequalities to ensure that those left behind now are not left further behind in a transformation. Policy processes must engage the range of food systems actors, ensuring effective participation by marginalized groups. Leveraging policy to redress inequality requires pushing back on the vested interests who benefit from the asymmetries in food systems.

4. **Tackling gender inequality in food systems is a pre-requisite for transformation:** Gender inequality runs deep in food systems, with men and women playing different roles, experiencing climate impacts differently, and articulating different priorities. Addressing gender inequality in policy requires robust analysis through a gender lens to identify current barriers and manifestations of inequality. Gender-transformative policymaking should facilitate equal and effective participation of women and men, girls and boys.

Among the examples highlighted in the paper are Chile’s labelling and marketing law, France’s food waste law, and dietary guidelines from The Netherlands, among others.

In addition, reflecting the importance of multi-sectoral policy approaches, and as highlighted in the CCAFS paper:

The experience of Peru in reducing child stunting demonstrates the value and potential impact of multi-sectoral, multi-level policy planning and implementation. After nearly a decade of little to no progress, between 2005 and 2010, child stunting in Peru dropped by five percentage points overall and ten percentage points in rural areas. An IDS paper argues that the critical factors in Peru’s success under its coordinated National Strategy for Combating Poverty and Chronic Child Malnutrition, CRECER, included 1) the high-level leadership of the Office of the Prime Minister, 2) the horizontal coordination across numerous ministries and alignment of social programs with the national nutrition strategy, 3) the vertical integration of national, regional, and municipal government efforts, and 4) donor support and civil society advocacy for the first three.

5. **How would these Voluntary Guidelines be most useful for different stakeholders, especially at national and regional levels, once endorsed by CFS?**
Building on the efforts of other CFS Voluntary Guidelines, the Voluntary Guidelines for Food Systems and Nutrition should serve the achievement of food and nutrition security for all and support the progressive realization of the right to adequate food in the context of national food security.

The VGs on Food Systems and Nutrition should provide concrete guidance on how to ‘activate’ the recommendations available in the #12 HLPE Report. The roles and responsibilities of the actors within the food system should be made explicit at national level so that everyone understands their contribution and what to expect from others.

Trainings on the role of food systems to deliver healthy diets should be made available, as should national monitoring and evaluation of its implementation so that course correction can be made as the results become available. These lessons should be fed back into the CFS process so that all stakeholders are able to learn from each other’s context specific challenges and achievements.

Food systems – from producer to consumer – are created by a multitude of decisions from individuals, companies and governments about what and how to produce, process, market and consume; all of which have a positive or negative impact on the environment. Guidance on how to make investments with long-term beneficial nutrition and health outcomes is key.

Civil society actors are best placed to assist. Harnessing the power of advocacy, CARE has elevated the role of advocacy as a core program strategy and is intentionally strengthening its advocacy efforts at local, national and global levels, to better understand and address structural causes of poverty, discrimination and hunger. Working alongside other civil society actors and social movements, we can raise awareness about the importance of healthy diets at a national level and shed light on those actions are contrary to the globally agreed nutrition targets and goals.