**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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| Yes it does – however it would be advisable to draw attention to the **urgency** of the issue; given that the guidelines will be released later in 2020 – by when there will be only 10 years left for meeting the 2030 SDG targets; five years to meeting 2025 WHA targets and we will be already five years into the UN Decade of Action on Nutrition. Therefore, the urgency of following these voluntary guidelines cannot be emphasized enough. Moreover, SDG2 underlies several of the other – if not all – SGDs; therefore, achieving the SDG2 targets is crucial for the achievement of all targets.  Other important points that can be included regarding the current situation of malnutrition as follows;   * According to the latest SOFI (2019), over 820 million people suffer from hunger, corresponding to about one in every nine people in the world. This figure which has been stable or even increasing (depending on the region) is alarming as it means we are moving further away from reaching the SDG2 targets. The same report also stated that over 2 billion people do not have regular access to safe, nutritious and sufficient food - that is one in four people [[Ref](http://www.fao.org/state-of-food-security-nutrition/en/)]; Moreover over 3 million deaths (children under five) related to malnutrition with maternal and child undernutrition contributing to 45 percent of deaths in children under five [[Ref](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(13)60937-X/fulltext)] ; around 2 billion people suffer from micronutrient malnutrition [[Ref](http://www.fao.org/3/x0245e/x0245e01.htm)]. * Non-communicable diseases (NCDs) are on the rise and are estimated to cause almost 75% of deaths around the world. One of the major causes of NCDs is unhealthy diets and malnutrition [[Ref](https://globalnutritionreport.org/reports/global-nutrition-report-2018/)]. |

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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| Climate change adaptation and mitigation is mentioned on page 11. However, these overarching guiding principles (on page 8) could also include a principle on adopting climate-smart approaches/interventions, that would abate or alleviate the negative impacts of climate change not just on the availability of food but also on the quality of food. Recent evidence shows that by 2050, the increasing CO2 concentration will result in many crops – in particular, staple crops – grown under such conditions losing their nutrition levels by 3–17%. This increase in CO2 concentration could cause an additional 175 million people to be zinc deficient, and 1.4 billion women of childbearing age and children under five who live in countries with greater than 20% of anemia prevalence would lose >4% of dietary iron intake [[Ref](https://environment.harvard.edu/sites/default/files/smith_2018_impact_of_anthropogenic_co2_emissions_on_global_human_nutrition.pdf)]. Therefore, technological solutions (such as micronutrient enriched, biofortified staple crops) and policies for adopting these should be encouraged. |

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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| Potential policy entry points include:   * Food-based nutrition interventions such as fortification – included under “processing and packaging” and biofortification included under “production system” are both proven to be cost-effective and scalable interventions for improving micronutrient intake. They are also equitable (corroborating with point 11) since staple foods are consumed by all members of a family – regardless of age or gender – unlike other nutritious foods (such as animal source foods which may be allocated to male members). * Rural smallholders – as both producers and consumers of food – are vulnerable to malnutrition. Their inclusion was highlighted in the previous CFS recommendations, but they seem to be missing from these guidelines. Given that the majority of the food in developing countries is produced by smallholders, and that majority of the population in developing countries reside in rural areas, rural smallholders could be centralized for policy entry points. Potential policies could include subsidized seeds of improved, nutritious varieties of crops (such as biofortified crops), linking smallholders to public food procurement. * On page 10, under the policy-relevant areas, biofortification could be given as an example of sustainable and nutrition-sensitive agricultural production models. Globally 21 countries have now included biofortification in their national policies [[Ref](https://www.harvestplus.org/knowledge-market/in-the-news/catalyzing-biofortified-food-systems-2018-annual-report)]. For further evidence on biofortification see [here](https://www.harvestplus.org/evidence-document). * On page 12, under Handling, Storage and Distribution heading, practices, and technologies to retain and/or add nutritional value can be included among the policy-relevant areas. * On page 13, biofortification could be included under the Supply of Nutritious Foods heading: Policies pertaining to input access/availability, extension services, and incentives (e.g., tax breaks or subsidies, guaranteed procurement schemes) could be implemented to stimulate the production of nutritious biofortified staple crops. * Agree with the sentence “Actions should be taken to make nutritious food affordable for all population groups” on page 15. Since the poor don’t tend to have access to diverse, healthy diets and since most of the calories consumed by the poor come from staple crops, improvement of these staple crops to delivery other nutrients (such vitamins and minerals) through biofortification or fortification, is a low hanging fruit for increasing the nutrient intake of these populations. * On page 17, under food quality improvements title, biofortification can be included alongside fortification as another evidence-based cost-effective and scalable intervention for improving the nutritional quality. |

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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| * One promising tool for improving food systems through their main building blocks (i.e., staples) is the substitution of conventional staple crops with their biofortified (i.e., enriched with micronutrients by using conventional plant breeding methods) counterparts. Biofortification is a low hanging fruit that requires minimum behavior change; is cost-effective and has been proven to improve not just nutrition but also health outcomes [[Ref](https://www.harvestplus.org/evidence-document)]. * With regards to challenges, constraints, and trade-offs, the reciprocal relationship between climate change and farming practices, urbanization, disparities, and equity issues and equitable distribution and access to food and technology are the prominent ones. * An ideal food system should be sustainable, resilient, equitable, and climate-smart throughout a productive whole value chain, that contributes to biodiversity, environment, and it should promote improved health and nutrition for all. |

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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| * Agree with the principles explained in Section IV. Specifically, the forum mentioned in paragraph 59 would be very helpful for the stakeholders to learn best practices from each other. * In addition to these principles, it is important to have the guidelines referred to/endorsed by important international platforms such as G20 where commitment/buy-in by national/multilateral leaders could be ensured. |