**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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| * Thank you for the opportunity to submit comments to the online submission.
* In addition to the comments put forth below we want to acknowledge our support of the CSM contribution as well as the proposed submission from FIAN Colombia.
* With regard to Chapter 1, it is important that the background and introduction to the document firmly anchor the Guidelines within the CFS mandate and specify/reiterate the CFS’s objective to contribute to the progressive realization of the Right to Food.
* In terms of the causes of malnutrition mentioned in Chapter 1 it is key to acknowledge the shift in consumption practices from unprocessed and minimally processed foods to ultra-processed foods, typically high in salt, sugar, saturated and trans-fat. This transformation is not remarked on in the document, yet it is essential to characterize the dietary changes that have been experienced in Mexico, and in the Latin American Region, more generally, and this shift has been a major contributor to increasing BMI and chronic diseases. The consumption of ultraprocessed products is likely to reach 50% of dietary intake (as it already is in Canada, the USA and the UK) before the Decade of Action on Nutrition ends and within the timeline of the 2030 Agenda if measures are not taken. (PAHO, 2019).[[1]](#footnote-1) It is essential to mention this shift in Chapter 1 to adequately reflect the realities faced in Mexico, the region and globally, so that solutions to address it can be remarked on later in the Guidelines.
* As a corollary to above, it is key to emphasize that the shift towards the production of inexpensive ultraprocessed food have led to a degradation and replacement of traditional, indigenous cuisines, traditional culinary techniques and unprocessed or minimally processed foods. Alongside changes in the types of foods produced and consumed, there are have been changes in the modes of eating, the practice of sharing a meal have been replaced with convenience and ready-to-eat foods.
* Chapter 1 fails to acknowledge the critical role played by the agro-industrial complex and the transnational food and beverage industry in contributing to the rise of all forms of malnutrition, its role has been documented by the UN Special Rapporteur for the Right to Food, in iPES reports as well as in the recent Lancet report on Global Syndemic of Obesity, Undernutrition & Climate Change. The background to this document would be remiss if it did not include an acknowledgement of how the reach and concentration of transnational food corporations, their political influence, and coordinated obstruction of nutrition and food systems policies have been a central detriment to the realization of the right to food, has led to broken food systems that contribute to all forms of malnutrition and that pose serious governance challenges.
* In point 10 it is important to emphasize that to foster policy change and to bring about the food system change that is necessary for health, environmental and social wellbeing, ample civil society participation is required, and insights and attention to those suffering from all forms of malnutrition is essential at all phases of change, from policy design to implementation and evaluation.
* The focus of Chapter 1 needs to not only be on reducing all forms of malnutrition but also creating food systems that contribute to food sovereignty and therefore food systems that value food as more than just a commodity that acknowledge foods’ cultural dimensions and centrality in social life and the importance of food systems that build on traditional knowledge and contribute to biodiversity, and that guarantee sustainable livelihoods and respect workers’ rights. The vision for the document should incorporate the concept of food sovereignty as an outcome to which it aims to contribute.
* Similarly, Chapter 1 should not only focus on human health outcomes that result from dominant food systems but also their environmental and climate impacts such as the intensive use of pesticides and chemicals that damage land, ecosystems and biodiversity and their social consequences that result when food producers’ livelihoods are challenged and their rights violated.
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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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| * We re-iterate the concern highlighted in the CSM contribution that it is essential that the guiding principles of the document promote a human rights framework and the progressive realization of the right to food and similarly acknowledge the indivisibility of human rights and the understanding that the right to food is indivisible to all other rights and cannot be achieved without the realization of women’s, children’s, peasant and indigenous rights, as well as the right to water, land, seeds, and the rights of all marginalized and disadvantaged groups. A guiding principle must be the progressive realization of these rights.
* Similarly, informed civil participation must be a central tenet of the guidelines. Work towards ensuring sustainable, healthy and just food systems must be realized vis-à-vis active participation of civil society, especially those most affected by all forms of malnutrition.
* Furthermore, a guiding principle must be to create food system transformation that seeks to restore power inequalities, and guard against conflict of interest and industry interference. Such interference is a major obstacle to government led action to creating sustainable, healthy and just food systems and therefore a guiding principle must be to rebalance power dynamics in decision-making and governance and ensure that actions are taken that are free from industry interference.
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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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| * We re-iterate the CSM’s vision for the “ideal” food system as one that not only promotes people’s health and well-being, but also preserves and contributes to the re-generation of nature and bio-diversity, is socially and economically just, appreciates and builds on diversity of cultures and knowledge systems, and contributes to the progressive realization of the RtF and related human rights. Similarly, we support their proposal regarding the five principal domains or policy entry points that should form the structure of Chapter 3: (a) Protection and regeneration of nature, b) Health and wellbeing, c) Modes of food production, exchange and employment, d) Culture, social relations and knowledge and the transversal domain of Governance).
* **In addition, we present here various examples of policies, interventions and initiatives that we believe should be considered and/or emphasized, specified in the Guidelines and that are relevant in the Mexican context and beyond to promote healthy, sustainable and just food systems, address all forms of malnutrition and promote healthy and sustainable diets:**
* The right to water and the importance of guaranteeing access to water in schools, home and public places is an essential element of healthy food systems, the installation of drinking water fountains in schools and public spaces is one way to guarantee this right that could be outlined in the Guidelines.
* The implementation of a 20% sugar-sweetened beverage tax, as recommended by the WHO (2017 “Taxes on Sugary Drinks: Why Do It?”) and the use of revenue to fund programs and policies to prevent obesity, chronic disease and to promote water access.
* That implementation of mandatory interpretive front-of-pack labelling that warns consumers of the levels of critical nutrients in their foods (added sugars, salts and saturated and trans fats), utilizing an evidence-based nutrient profiling system (WHO. Report of the Commission on Ending Childhood Obesity and PAHO. Plan of Action for the Prevention of Obesity in Children and Adolescents.)
* The restriction of food and beverage marketing targeted or attractive to children and adolescents (under the age of 18), including the prohibition of the use of all marketing tools (freebies, contests, use of celebrities and characters, etc) in all media channels, (Recommendations from a Pan American Health Organization Expert Consultation on the Marketing of Food and Non-Alcoholic Beverages to Children in the Americas).
* The restriction of the offer of ultra-processed foods and beverages in and around daycare centers and schools and promote the sourcing of food from local agro-ecological small-scale producers.
* The development of food-based dietary guidelines that promote dietary diversity should be established and utilized to inform food and nutrition policy, including school food policies.
* The integration the International Code of Marketing of Breastmilk Substitutes and subsequent resolutions into national legislation.
* The promotion of participatory educational campaigns, informed by those with traditional culinary and agro-ecological knowledge, should be promoted to re-value traditional, unprocessed/minimally processed, indigenous foods and to value the work of family farmers and to serve as a counterweight to the marketing and glamorization of ultra-processed foods. ( “Valor al Campesino”: <http://valoralcampesino.org/informate-conoce-el-campo-mexicano/>)
* The promotion of practices of agroecology--through the protection of human rights, the implementation of policies and financing--as a way to sustainably manage and defend the land and natural resources, to promote biodiversity and preserve soil health, and valorize small food producers’ work and lives, while minimizing water use, the use of chemicals and pesticides and effects on the climate.
* The promotion of small and medium sized farmers and producers, the promotion of public procurement programs that benefit these producers and the strengthening of local and territorial markets and autonomous links between small-scale farmers and organized consumers.
* A transversal action that cuts across the initiatives and policies mentioned above and already mentioned in Chapter 3 of the guidelines, is that of avoiding conflict of interest and industry interference in all policy design, implementation, monitoring and evaluation processes by ensuring robust governance mechanisms, ensuring government-led action, meaningful participation of civil society and those most affected by malnutrition.
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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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| * From the outset these guidelines need to be relevant and specific. They need to draw on existing UN documents but they also need to add to the body of literature by offering guidelines on topics that have not been articulated in other recommendations and documents. This is the primary way to make them useful for different stakeholders in different country contexts.
* After the development of the guidelines, there should be a permanent campaign to inform stakeholders of them and to help them to integrate these guidelines into their national plans and policies.
* The Regional Consultations should be well documented and their outcomes reflected in the text of the guidelines.
* There should be follow up with civil society members in each region to inform them of these guidelines and to “take stock” of the extent to which they have been implemented.
* Multistakeholder platforms that present conflicts of interest must be discouraged and all mention of multistakeholder platforms in the Guidelines should include a reference to the need to safeguard against conflict of interest (reflecting the text on conflict of interest in the ICN2 Framework for Action Document). This is essential to ensure that the Guidelines are properly implemented and utilized by stakeholders at the national and regional level.
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1. <http://iris.paho.org/xmlui/bitstream/handle/123456789/51094/9789275120323_eng.pdf?sequence=1&isAllowed=y> [↑](#footnote-ref-1)