
We would like to thank the FAO for the opportunity to submit comments to this online discussion. For your background information, USCIB is the American affiliate of the International Chamber of Commerce (ICC), the Business and Industry Advisory Committee (BIAC) to the OECD, and the International Organisation of Employers (IOE). As such, we work closely with intergovernmental bodies, including the OECD, WTO, ILO, UN bodies and vis-à-vis foreign business communities and their governments. In addition, we would like to highlight that USCIB is a membership based organization which operates under bylaws that provide the framework under which we consult with our own stakeholders. Our processes are transparent. We provide views and inputs which are built through a consultative process and reflect a consensus among our large membership. We therefore hope that the FAO reads this submission within this context.

The questions below are extremely broad and encompass themes which are complex. Although an online consultation will solicit some input, we would like to suggest that the FAO create a more targeted approach to engaging with stakeholders, including the private sector. We recommend a formal consultation with stakeholders, including the private sector, to have a more robust and complete discussion on these important issues related to nutrition.

Prior to responding to the questions below in more detail, USCIB would like to underscore the following:

- An effective nutrition policy must be developed using evidence-based science;
- The private sector can play an important role in achieving a more nutrition-enhancing food system by innovating and investing in the food and agricultural sector;
- Food systems should place emphasis on food safety, quality and assurance, with regard to the product itself;
- Preservation of natural resources to continue to grow food is necessary for nutrition;
- Empowering women and girls is important; and
- Effective and efficient nutrition policies require coordination across government ministries working with the private sector and civil society.

Policy issues: What policies can make agriculture and food systems more nutrition-enhancing? What are the knowledge gaps in policies associated with nutrition-enhancing agriculture and food systems?

With regards to these aforementioned questions, we would like to highlight the International Life Sciences Institute (ILSI) related work on building an effective nutrition policy. ILSI is a nonprofit, worldwide organization whose mission is to provide science that improves public health and well-being to states. To build an effective nutrition policy there should be a high probability for the effectiveness of nutrition-related interventions with low probability for unintended consequences. To achieve this balance, it is important to have an adequate level of scientific evidence.
The data essential for developing and implementing effective nutrition strategies include: knowledge of what a population is eating, knowledge of nutritional and health status of the population and key subpopulations, behavioral changes important to successful implementation and program evaluation of outcomes.

While having the correct data is crucial, it is equally important to have the right institutional arrangements in place to best support coordination and implementation of effective nutrition strategies. Effective and efficient nutrition policies require coordination across government ministries working with the private sector and civil society.

The private sector can play an important role in achieving a more nutrition-enhancing food system by innovating and investing in the food and agricultural sector. In addition though, meeting the growing challenges of the future, such as constrained resources, greater demand, and of course health-related challenges, will require policies that promote innovation and efficiency across the supply chain, from production to distribution and consumption.

With regards to distribution and consumption, it is particularly important to reduce waste and post-harvest losses, and lower costs of storage, transportation, and processing which can reduce costs and help to make foods more available. These actions would help to improve food access and food products.

USCIB believes that the private sector know-how in the areas of innovation, science and technology, as well as good production and management practices, can be increasingly harnessed through effective partnerships with research institutions, farmers, policy-makers, and civil society. The private sector plays a critical role in further strengthening markets, economic growth and livelihoods. While private sector involvement is key, there is also a need for government collaboration particularly in helping to ensure greater policy coherence such as reducing barriers to trade.

**Programme issues: What do nutrition-enhancing agriculture and food systems look like? What have been the success stories and lessons learned from programmes at country level? How can we monitor the impact of such programmes on food consumption and nutrition?**

To answer the questions above, we would like to highlight the following areas that need to be further addressed to provide an adequate response:

**Food, Diversity, Safety and Quality Assurance**

It is important to understand what the population is eating. Essential nutrients for humans are provided across the diverse pattern of foods which means that diversity is essential for good nutrition. Therefore, promotion of good nutrition is not a simple matter of emphasizing approaches that “one size fits all.”

Additionally, due to ecological, economic, cultural or special physiological needs, human diets may require specific interventions that complement the nutrient gaps that may occur. Therefore, it is
desirable to have nutrition interventions such as biofortification, food fortification, products formulated to satisfy nutritional requirements of specific groups of the population and food supplements.

Equally important is to ensure a population has access to food products that are safe. Food systems should place an emphasis on food safety, quality and assurance, with regard to the product itself. Likewise, food companies should provide the necessary information to ensure foods are delivered and prepared in a safe manner.

Nutrition Education

Nutrition education is another important area to address. It is important to provide the necessary facts which are focused on evidence-based science so consumers can make the appropriate decisions for their families. For this reason, we believe that international (evidence-based) standards such as CODEX, provide consumers with the right information/environment to make choices. Subjective standards are not helpful to the consumer.

Sustainable Agricultural Production

Preservation of natural resources to continue to grow food is necessary for nutrition. USCIB urges the FAO to promote food systems that protect natural resources especially since there are continuing challenges that the agriculture industry must face such as population increases, climate change, and water availability. As such, USCIB would like to highlight the importance of careful end-to-end management throughout the whole supply chain – from soil quality, water preservation, productivity/yields, to building climate change resilience, fortification, R&D, and post-harvest losses.

In this area, private sector plays an important role in research and development, technologies, innovation, and supply chain management. This includes working with smallholder farmers who are key players in helping to ensure a more sustainable, productive, and equitable agricultural development. Nestlé’s Rural Development Framework is an example of how the private sector invests in the development of farmers and their livelihood. In fact, nutrition is identified as one of the priorities.

In addition, we would like to also include an example of how one company places strong emphasis on environmental conservation and performance. Coca Cola’s Sustainable Agriculture Guiding Principles set expectations for ingredient suppliers to address sustainability challenges specific to agriculture, including areas such as workplace and human rights, environment, and farm management systems.
Empowering Women and Girls

Another crucial issue includes ensuring the empowerment of women and girls both economically and socially. These members of society have an important role in the decisions made at the household level with regards to food and nutrition. Therefore, we believe that it is important to promote policies that help women become farmers, traders and business owners. Equally important is that these members of society are educated and properly informed to make healthy choices for their households. The private sector can play a crucial role in empowering women and girls. Nestlé’s Action Plan on Women in the Cocoa Supply Chain reflects the company’s commitment to addressing this important issue.


Partnerships: How can we work across sectors and build strong linkages between food and agriculture, social protection, employment, health, education and other key sectors? How can we create sustainable partnerships? How can we build effective governance for nutrition?

With regards to partnerships, the areas that the FAO questions refer to are very broad. We recommend that the FAO be more precise in outlining what type of partnerships and linkages it is interested in. Prioritizing the areas in which FAO is interested in creating partnerships with various stakeholders would be a more effective manner to obtain input.

In light of the question, however, USCIB would like to highlight the work that the food and beverage industry has engaged with the WHO’s 2004 Global Strategy on Diet, Physical Activity and Health (Global Strategy) and most recently the WHO Global Action Plan on NCDs (2013-2020) and the monitoring framework. Cooperation between governments and the food and beverage industry is necessary to the adoption of a multi-sector approach to addressing nutrition challenges. For example, many food and beverage companies have already partnered with the WHO, its regional offices, Member States and the wider public health community to deliver positive outcomes with regards to diet, physical activity and health. Some of the steps include:

- Reformulating existing products and developing innovations that offer healthier options for populations;
- Providing populations with clearer information about the nutritional composition of foods and beverages;
- Adopting voluntary measures on the marketing and advertising of food and beverages particularly to children and
- Promoting greater physical activity, sports and healthier lifestyles.

For more information about how the food and beverage industry has worked with the WHO, please refer to https://www.ifballiance.org/ and to a 3rd party report by Accenture https://www.ifballiance.org/sites/default/files/AccentureMonitoringReport2012FINALDecember2012.pdf

On the question of governance, we would recommend that the FAO clarify what is meant by that term. For example, we would like a clarification on who or whom would be governed? And on what legal basis would those entities be governed?