

**Freshfel Europe contribution to the development of the Committee on World Food Security (CFS)  
Voluntary Guidelines on Food Systems and Nutrition: Zero Draft**

2<sup>nd</sup> September 2019

Dear FSN Team,

Freshfel Europe, the European Fresh Produce Association, endorses the Committee on World Food Security's initiative to develop Voluntary Guidelines on Food Systems and Nutrition. In regards to the guiding questions on the Voluntary Guidelines Zero Draft, Freshfel Europe would like to outline the following aspects for consideration.

Chapter 1 adequately reflects the current situation of malnutrition in relation to the UN's 2003 Agenda and emphasises the health, economic and social ramifications of malnutrition in all its forms. Nevertheless, a 'health-in-all-policies' should be underlined so coherent and holistic policies are achieved that result in effective and efficient outcomes. While attention should be brought to groups that are historically nutritionally vulnerable, it is equally important to focus efforts on whole populations, which are increasingly suffering from inadequate diet. 22 out of the current 28 EU Member States do not meet the WHO recommendations of consuming a minimum of 400g of fruit and vegetables per capita per day, with Europeans on average only consuming 353.07g of fresh fruit and vegetables per day<sup>1</sup>.

Chapter 2 provides a comprehensive list of guiding principles for the Voluntary Guidelines. It is especially important that a systematic, holistic, evidence-based approach is taken. In this way, and by using a multi-actor strategy, malnutrition in all its forms will be better prevented. In addition, the guiding principles should specifically target children. Dietary habits during childhood and adolescence highly inform diet choice during adulthood. Good dietary habits should be encouraged in children from an early age in order to shape future healthy eating habits which are essential for malnutrition prevention.

Chapter 3 covers a very diverse range of policy areas which influence the food system. However, the following additions should be considered:

- Point 43(f) 'Linking farm to school' should not merely advocate links between local farms but between the food system and school. Children should be encouraged to try a wide diversity of products to expand their healthy food palette and knowledge, not just those which are locally produced and likely consumed at home.
- Point 43(h) 'Agricultural research, innovation and development for healthy diets' should also cover research and innovation for the development of varieties to meet consumers' changing tastes and needs, for new plant health tools, and for methods to successfully promote and market healthy food products in a highly competitive food environment.

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<sup>1</sup> Freshfel Europe (2017), Freshfel Fruit and Vegetable Production, Trade, Supply and Consumption Monitor in the EU-28, Brussels: Freshfel Europe.

- Point 51(b) 'Transparency of information on labels' should include the facilitation of making claims about the 'healthfulness' of intrinsically healthy foods, such as fresh fruit and vegetables, to help consumers understand their important role in diet at points of sale. Further to this, nutrient profiles should also be implemented and linked to specific health benefits of products to help consumers understand nutritional composition of healthy products and their related health benefits.
- Point 55(c) 'Nutrition education' should incorporate compulsory nutrition training as part of the curriculum for undergraduate medical students so that they may offer basic nutrition and diet advice to patients. Medical professionals should also be offered nutrition focused training courses throughout their career, in particular nutrition application for malnutrition prevention. Nutrition education should also be available to adults. For example local community organisations/networks should offer food education sessions focused on nutrition education, where and how to access healthy food, and most importantly how to prepare and consume it especially through at-home preparation.

In regards to the development of the Voluntary Guidelines overall, we would like to refer you to Freshfel Europe's recently formulated Thematic Network Joint Statement on '[Stimulating fresh fruit and vegetable consumption for healthier European consumers](#)' (2018). This common position paper endorsed by 42 agri-food and health stakeholders is a joint call to action on ways to stimulate fruit and vegetable consumption to prevent the onset of non-communicable diseases. The Joint Statement puts forward 43 points of action to achieve a holistic multi-actor and multi-level approach to increasing fruit and vegetable consumption.

Thank you for this opportunity to contribute to the development of the Voluntary Guidelines and please do not hesitate to contact me if you have any queries.

Kind regards,

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