**CFS POLICY PROCESS ON THE DEVELOPMENT OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION**

**TEMPLATE FOR SUBMISSIONS**

FROM: WORLD OBESITY FEDERATION

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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| Para 6: The list of concerns here are fine, except that they miss the **loss of nutritious food supplies** – this is a catch-all phrase to mean the loss of biodiversity in food supplies, loss of culinary skills in domestic food production, and lost healthy dietary patterns (e.g. through uptake of formula baby milk, the use of which reduces breastmilk supply). |

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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| Para 33. Without further qualification, this definition looks outdated, and will hamper any discussion of the new agenda issues concerning sustainable supply systems and nutrition in all its forms (including overweight/obesity).  I urge you to consider adding the explanatory text from para 8 of the CESRC comment 12, namely:  ***The Committee considers that the core content of the right to adequate food implies:***  ***The availability of food in a quantity and quality sufficient to satisfy the dietary needs of individuals, free from adverse substances, and acceptable within a given culture;***  ***The accessibility of such food in ways that are sustainable and that do not interfere with the enjoyment of other human rights.***  This will help you to justify the main thrust of the document, sustainability and protecting nutritional health, and especially the immediately following section on Guiding Principles for Reshaping or Promoting Sustainable Food Systems.  Para 36 (f): Perhaps add **nutritious** to the list here. Otherwise the principles are not meeting the criterion ‘satisfy the dietary needs’ stated in the right to food, above. |

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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| Para 43 (f): Schools are not the only public procurement opportunity, of course. In some countries there is no catering provided in schools, and in some countries school catering is outweighed by other services: social care, health, military etc. (Figures for the UK in 2010 show school catering at 29% of total public food procurement spending.) We note that this is explained more fully in Para 48 (b).  Para 43 (l): The elephant in the room in the list (a) through (k) is a significant missing item, namely the commercial practices of the larger food manufacturing companies promoting products we should be eating less of. Perhaps something could be added here about mechanisms to encourage support for sustainable and nutritious food systems in the private sector: this would include investment banks and funds, major producers, advertising agencies and fast service catering companies, and perhaps also the role of civil society in holding these actors to account.  Para 51 (a): Good to see these marketing policies here. You might add a reference to the WHO regional offices’ definitions of ‘less nutritious foods’ (i.e. nutrient profiling schemes) For reference, see page 4 of the WHO document here:  <https://www.who.int/end-childhood-obesity/publications/taking-action-childhood-obesity-report/en/>  Para 54 Something needs to be said here about the chain of production, and how the ‘consumer’ for farm outputs is often a wholesaler of food manufacturer, and the ‘consumer’ of food manufacturers’ products is often a retailer or caterer. Even the shopper may not be the final consumer. And in all cases, the intermediate consumer has criteria for making a purchase that are not necessarily best at promoting sustainable and nutritious food supplies. A simple free-market model where consumers determine the nature of the product, and suppliers talk of ‘consumer is king’ and ‘we only sell what the consumer wants’ is naïve in the extreme.  Therefore the paragraph here needs to recognise that the final consumer may have little choice in the nature of the product offered. Individual consumers’ choices cannot be expected to bring about change in food systems without the support of structural changes in governance, regulation and accountability.  That said, the role of social marketing and health education campaigns is important, though primarily as a means of gaining public support for regulatory action. |

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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| **No comments** |

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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| **No comments** |