

Global Dairy Platform (GDP) appreciates the opportunity to submit inputs for consideration by the Committee on World Food Security (CFS) in response to the call for comments on the “Voluntary Guidelines on Food Systems and Nutrition” Zero Draft.

GDP, a collaboration of dairy companies, associations, scientific bodies, and other global partners is committed to demonstrating dairy’s positive contribution to global food systems, healthy diets, and sustainable livelihoods.

The following responses are offered regarding the Zero Draft and highlight three main topics of importance within food systems: (i) access and affordability for all; (ii) regionally based, culturally informed solutions; and (iii) the importance of both animal and plant-sourced foods in a healthy diet.

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?**

Overall this chapter captures the majority of the issues that promote/lead to malnutrition. However, there are a couple of issues that could be more fully addressed concerning governmental roles in:

* + improving infrastructure that will allow agricultural products to more effectively reach all people in a region, a country, a continent. In regions where poor roads hinder transportation of goods, the best agricultural practices might still not be able to aid the majority of the people in that region.
  + taxation and regulation of both domestically produced and imported food stuffs. Government policies on these issues can greatly impact accessibility and affordability, which in turn can influence nutrition/malnutrition status, particularly in many developing countries.
* The chapter focuses primarily on malnutrition from the perspective of the consumer/individual. Very little is mentioned about other aspects of the food system, and the roles they can play in battling malnutrition (as well as addressing other SDGs besides hunger/malnutrition alleviation). For example, there are strong data indicating that livestock/dairy production plays a role in poverty alleviation, and that livestock ownership in developing countries improves nutritional outcomes for individual owners and those with whom they work.

(Reference “Dairy Developments Impact on Poverty Reduction” http://www.fao.org/3/CA0289EN/ca0289en.pdf)

2.  **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?**

The document indicates that guidelines need to conform to regional customs, beliefs, cultures, etc. In that regard, more can be said to differentiate the health/nutrition needs of people in developed vs. developing regions. Animal proteins (like most foods) may be overeaten in certain developed countries but the nutritional value they offer can help in the reduction of malnutrition in the developing world. The need for a more localized approach to nutritional practices should be accentuated more in the document.

The Guidelines point to the need to provide evidence-based information to stakeholders. It would be helpful if the committee outlined what constitutes “evidence-based”; will all published scientific data be considered as adequate evidence? Will certain types of research be stressed? Will research carried out in one geographic region be used as evidence that drives guidance in other regions? Who gets to choose the validity/suitability of studies used to generate guidance? What happens when there is a lack of scientific evidence? Finally, sustainable food system guidance is sometimes driven by emotional/anecdotal information, rather than science-based data. To what extent, if any, will this sort of information be viewed as “evidence?” It is imperative that policy-driven decisions be based on sound science and data gathering.

The Guidelines acknowledge the complexity of food systems (paragraph 20). However, per the HLPE Report of Food Security and Nutrition (Oct 2017), food systems encompass a broad set of activities including the production, processing, distribution, preparation and consumption of foods; the Guidelines barely address a number of these issues, focusing primarily on the consumption of foods at the individual level. We encourage the committee to expand the coverage of these important issues.

* In paragraph 24, innovation, technology and infrastructure are listed as three main drivers that will aid in implementation of the Guidelines. All these functions require financing. Who will pay for this? Consideration of the financial aspects of the Guidelines and how governments as well as the private sector can be integral seem warranted.
* The definition of a healthy diet (paragraph 32) has a Western/developed world slant:
  + Such guidelines have long stressed reduced consumption of dietary fat, sugar, and salt, and more fruits, vegetables and whole grains. Some data support this guidance (though not universally), particularly in Western populations. But what about in countries that for various reasons struggle to produce enough nutrient dense foods to satisfy their population demands, and those that import agricultural products, making animal proteins, fruits, vegetables, etc. less available or less affordable? What about people in hot regions who perspire more and may benefit from an increase in electrolytes (sodium, potassium) in their diet, or people who receive inadequate calories to support their energy needs who can benefit from added fat (and, yes, maybe some added sugar

as well) in their diets? In this regard, more and more health experts are stressing the need for healthy dietary patterns, rather than focusing on individual nutrient targets.

*(Reference: Astrup, A et al. BMJ* 2019;366:4137 doi: 10.1136/bmj.l4137 (Published 3 July 2019)

* + It is understood that these Guidelines are meant to be somewhat general and cannot cover the specific needs of individual demographic groups. However, by “laying down a marker” as to what constitutes a healthy diet, the Guidelines do not fully acknowledge the diversity of needs of people around the world based on economics, availability, lifestyle and cultural norms. Ideally, the Guidelines will allow for and encourage the definition of “healthy diets” to include countries’ own national dietary guidelines instead of solely being defined by a narrow set of indicators.
  + The document largely omits the need for potable drinking water/fluids globally. The committee highlights daily needs for energy, vitamins, and minerals. But in many regions, one of the most pressing nutritional need is adequate, safe, fluid intake. Beverages such as fluid milk can serve numerous nutritional needs (energy, fluids, vitamins, minerals, protein) and should be acknowledged in the document.

**3.   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?**

* The three primary entry points: supply chains, food environments, and consumer behavior seem all-encompassing. However, the factors outlined to help improve nutrition should be more balanced; there seems to be an undercurrent that favors plant-based rather than animal-based agriculture. For example, in paragraph H (Food Supply Chains), the document reads as follows:
  + *“Investment in research and innovation for commercial development of nutrient-dense foods and crops, such as fruits, vegetables and legumes, and bio fortified crops, could lead to improvements in productivity enabling better access to healthy diets and nutrition while minimizing their environmental impact.”*
  + Research on animal production practices is clearly omitted. Why is that? If developing nutrient-dense diets is truly the aim here, more research on livestock production seems warranted as well.
  + The document also neglects to consider the important role of livestock in a circular economy. In many countries Livestock provide draft power and are the primary source of fertilizer for crop production. Livestock also consume the byproducts from crop production and from the processing of plant produce for human edible foods. Additionally, livestock can graze and consume grass, straw and other biomass from marginal lands which is inedible by humans and as such convert this to highly nutritious human edible food stuffs.
  + While the document does mention that diverse food production (animal and plant) can serve as a hedge against global disasters (drought, famine, conflict, etc.), it could more definitively discuss the resilience of livestock against storms, floods, etc. While severe weather can potentially wipe out a crop for a season or longer, animals can be moved to shelter, fed alternative feed, etc., and better withstand climatic hazards that can devastate crops. Further, in times of conflict livestock are mobile and can be moved with their owners.
  + Finally, seeking ways to incentivize farmers to adopt new innovations and technologies should be highlighted as a means of increasing productivity and promoting more sustainable food production.

4**.  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 policymaking?**

* Encouraging an environment where all stakeholders, including farmers, the private sector, government, and academia have a seat at the policy table to assist in the development of a nation’s guidelines will help to strengthen the final product in most cases.
* Enhancing outreach and extension services to farmers, providing them with information and access to innovative production techniques and education about best practices, will enable farmers to improve yield and the environmental and economic sustainability of their farms.
* More public/private initiatives should be considered. Engaging industry as a part of the solution rather than viewing it as a part of the problem would spur more investments in research and technology, among other things, and hasten progress.
* Seeking alliances between government agriculture departments, universities, and industry can provide opportunities for more, larger grants to students and faculty to conduct targeted research on healthy crop and livestock production. Some programs like this do exist, but not enough.
* Alliances with companies working on technological solutions to global health problems should be considered. Local solutions to various food production-related issues is invaluable, but an acknowledgement that high tech, futuristic solutions are and can be developed to solved large scale undernutrition problems should be sought as well.
* Encourage collaboration globally among policy makers by proposing not only set topics for guidelines to consider but also set goals for these guidelines to achieve.

1. **How would these Voluntary Guidelines be most useful for different stakeholders, especially at national and regional levels, once endorsed by CFS?**

The document can more clearly highlight the complexity of the global food system, and the potential for unintended consequences when we generate policy changes without a complete understanding of the resultant outcomes.

For example,

* In a nutritionally challenged community which depends on animal protein sources, what would the consequences be if we enact guidelines that would scale back such high-quality protein and replace it with a lower quality source derived from plants?
* What would replace staple foods like potatoes in countries like Peru with a rich heritage of tuber consumption?
* What are the long-term consequences (good and bad) of growing crops organically in regions that have traditionally used pesticides?

Every action with respect to global nutrition change can produce another, often unforeseen or unintended outcome. We need to think these issues through carefully before enacting sweeping policy changes. Ideally, countries will make these trade-off decisions based on regional and population relevant science-based information.

Lastly, governments should be encouraged to monitor and measure the impact of voluntary guideline implementation to ensure they deliver intended outcomes, and not produce unintended consequences