CFS policy process on the development of the Voluntary Guidelines on Food Systems and Nutrition

Collection of contributions received

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# Topic note

Combatting malnutrition in all its forms – undernutrition, micronutrient deficiencies, overweight and obesity – is among the most pressing global challenges that countries face today. Urgent actions are needed to address these challenges and the negative impacts associated with malnutrition.

Fostering discussion and debate around policy and institutional reforms are key to promoting sustainable food systems that improve nutrition and enable healthy diets.

The Committee on World Food Security (CFS) is undertaking a policy process which will lead to the development of Voluntary Guidelines on Food Systems and Nutrition. The preparation of the Voluntary Guidelines is informed by the scientific evidence provided by [CFS High-Level Panel of Experts on Food Security and Nutrition (HLPE) Report on Nutrition and Food Systems](http://www.fao.org/3/a-i7846e.pdf) launched in October 2017.

The Voluntary Guidelines are intended to be a reference document that provides guidance to governments, as well as to specialized institutions and other stakeholders, on appropriate policies, investments and institutional arrangements needed to address the key causes of malnutrition in all its forms.

A comprehensive and systemic approach will be followed with a view to addressing policy fragmentation between relevant sectors with special emphasis on the food, agriculture and health sectors, while also addressing livelihood and sustainability challenges.

Following the endorsement by the Committee in 2018 of the Terms of Reference which include the main topics and issues to be addressed by this policy process, a [Zero Draft of the Voluntary Guidelines](http://www.fao.org/fileadmin/templates/cfs/Docs1819/Nutrition/CFS_Zero_Draft_Voluntary_Guidelines_Food_Systems_and_Nutrition.pdf) has been prepared and circulated as the result of an inclusive process that involved a wide range of stakeholders.

The Zero Draft is made up of four chapters. The first one provides the context, the objectives and purpose as well as indications on the nature of the Voluntary Guidelines while the second deals with key concepts concerning food systems and nutrition and guiding principles. Chapter three includes descriptive text intended to inform the preparation of the Draft One of the Voluntary Guidelines. The language of this chapter does not represent suggested text for the Voluntary Guidelines but initial ideas regarding the issues and topics to be covered. Therefore, CFS stakeholders are not expected to provide proposals of amendments of the current text of Chapter 3 during the regional consultations. Both the current structure and content of Chapter 3 will change in the next version of the Voluntary Guidelines, based on the inputs received during the e-consultation. This will be an opportunity for CFS stakeholders to suggest the most appropriate policy areas and interventions to reshape and promote sustainable food systems that improve nutrition. The fourth and final chapter includes provisions regarding the implementation of the Voluntary Guidelines and the monitoring of their use and application.

The e-consultation outcomes will contribute to the preparation of the First Draft of the Voluntary Guidelines, which will be negotiated in spring 2020. The final version of the Voluntary Guidelines will be then presented for consideration and endorsement by the CFS Plenary at its 47th Session in October 2020.

Through this e-consultation, CFS stakeholders are kindly invited to answer the following guiding questions using the proposed template:

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

# Contributions received

## Sofia Boujida, Morocco

A- Focus Monde rural, basé de fourniture d’aliments sains nutritifs :

1- promouvoir la recherche au niveau rural (lien entre pratiques agroécologiques durables et la recherche et résultats sur les apports en nutriments)

2 - inclusion financière du monde rural

3- Rapprochement université et monde rural

4- éducation financière et nutrition du monde rural

5- Focus sur les activités, sujets traités et impacts des ONG ou associations locales dans le développement des régions (actions de forestation, de gestion des bassins versants, gestion de l’eau, gestion des sols, niveau de renforcement des capacités)

6- promouvoir l’économie circulaire, d’utilisation des déchets comme source de nutriments

B- Action de recensement des pratiques agricoles durables et les diffuser au niveau national et régions, les digitaliser

C-Actions gouvernementales également pour limiter l’utilisation des pesticides, promotion des investissements ( économie circulaire, traitement des eaux usées, privilégier les eaux non conventionnelles)

## Florence Egal, Food Security and Nutrition expert, Italy

Thank you for this opportunity to contribute to a most interesting process.

General comments :

In the context of Agenda 2030, we cannot afford to loose any more time. Limiting the VGs to healthy diets (e.g. para 18 p.4), rather than sustainable diets means we are missing a major opportunity to explicitly address livelihoods and environmental issues. Sustainable food systems should be designed to deliver sustainable diets; and sustainable diets can provide the entry point to reorient failing food systems

What do we intend by evidence-based practice? For decades «evidence-based in the nutrition world has been equated to biomedical research. We need - and lack – practice-based evidence on successful practices at local/territorial level.

Catering should be explicitly mentioned as it is a key source of livelihoods, in particular for women and youth, it influences people’s diets (chefs are playing a key role in promoting diets), and together wih public procurementy, it provides an excellent entry point to integrate relevant food supply chains (see para 29., p. 6)

In the guiding principles, we may want to make more explicit reference to governance. In this perspective the work carried out on urban-rural linkages <https://urbanrurallinkages.files.wordpress.com/2019/07/url-gp.pdf> and territorial approaches <https://collaboratif.cirad.fr/alfresco/s/d/workspace/SpacesStore/6daa60e1-d89e-4a59-9bfd-ff5f66a93130/TP4D_vENG.pdf> could be useful.

On section III, we should not parcel out the food systems approach into three “constituent elements” (i.e. sub-systems which are actually not even complementary). This will eventually allow institutions to remain within their comfort zones and pay lip service to the need for an integrated vision (as has been the case for decades). We should avoid introducing and/or supporting yet more jargon and potentially confusing concepts (e.g. food environment)

It is regrettable that the importance of a territorial (bio-regional) approach and related traditional diets for sustainable food systems is not acknowledged. The importance of local markets as a key element of local economies should be spelt out.

Food safety and quality standards, and related legal and regulatory tools and procedures should be reviewed in terms of local relevance and impact on sustainable development (including environment and social justice)

The work carried out by the CFS in other work areas (e.g. on the Urbanization and Rural Transformation working group) could provide useful insights.

Specific comments

I 1 para 6 p. 2

This paragraph should come higher up: understanding the causes of malnutrition is essential to understanding food systems and provide a planning basis.

What about inadequate food–related practices (not limited to child feeding)? Changes in such practices are often responsible for changes in nutritional status.

P. 7, para 32 : according to this definition contaminated foods could contribute to healthy diets?

P. 8, para 36

b/ Sustainable development can best be addressed at local/territorial level. The order should be reversed with national and international institutions explicitly facilitating local action

c/ the present focus on « healthy diet , healthy planet » by and large disregards the social dimension, which is essential to sustainable development

e/ should aim to sustainable dietary practices and start with consumers. Only a demand driven approach can help correct the dysfunctions generated by the classical supply-driven approach

g/ capacity building should explicitly mention interdisciplinary (in particular food and health) and inter-institutional collaboration

p. 10, para 43,

this looks very much so far as a business-as-usual shopping list (and this is probably unavoidable if we keep these three distinct sections)

f/ the title should be reworded: schools have a key role to play to promote sustainable diets and sustainable food systems, this of course is not limited to production.

I of course remain available for any clarification or further discussion.

## Dick Tinsley, Colorado State University, United States of America

I have carefully reviewed the Zero Draft and would like to offer the following comments for consideration.

1. First is what I consider a major omission in the total effort for improved nutrition which I will provocatively refer to as the Genocide Omission. I hope the title gets your attention.

I come from an agronomy perspective with a primary concern for farmers to be able to produce the crops needed for a quality diet. In this regard I think we have done an excellent job of determining what constitutes a quality diet but have implied that accepting or rejecting a quality diet is 100% discretionary to the individuals and households. I seriously doubt this and think most decisions are highly compromised. Thus, the important concern now is to integrate the recommended improved diet into the economic situation of the beneficiaries. Unfortunately, most of the people with suffering severe malnutrition are poor with their economic opportunity heavily dependent on hard manual labor and proportional to the ability to undertake that manual labor. However, in your Zero Draft no mention is made of the dietary needs to optimize economic opportunities. I think this needs to be corrected.

As best I can estimate this, to do a full day of manual labor, be it agronomic field work or other manual labor, requires a diet of at least 4000 kcal/day. Any think less and the economic opportunity and ability to produce or purchase the recommended quality nutrition will be compromised. The calorie needs are rarely included in any nutritional reports I have seen. The best I have seen is dismissing the need by comparing it to an “active” person requiring 2800 kcal/day. This would be a FAO office worker with healthy exercise regime such as taking an extended lunch break for a walk around the Forum, Circus Maximus, and perhaps out to the Colosseum and back. Far short of what is needed for a full day of manual labor.

As this applies to smallholder agriculture there is suppressing little referenceable data available on the calories available to smallholder famers. The limited data I have found indicates between 2000 and 2500 kcal/day. Allowing 2000 kcal/day for basic metabolism and recognizing that hard manual labor such as land preparation with a hoe will require 300+ kcal/hour, the work day can be limited to a couple diligent hours perhaps paced over a couple more. The result will be a prolonged crop establishment period extending to 8+ weeks with declining potential yield as the delay progresses. The end result is if relying on manual labor you will never be able to cultivate enough land in a sufficiently timely manner to meet food security needs. Thus, improving quality nutrition will be impossible as basic economics of survival will force you to concentrate on high calorie crops. The bottom line will be if you want food security and quality nutrition the key will be facilitating smallholders access to mechanization, so they can get their crops planted in a sufficiently timely manner to have a chance at food security.

Please review the following webpage from the <https://smallholderagriculture.agsci.colostate.edu/> website I manage.

<https://smallholderagriculture.agsci.colostate.edu/integration-an-under-appreciated-component-of-technology-transfer/>

<https://smallholderagriculture.agsci.colostate.edu/calorie-energy-balance-risk-averse-or-hunger-exhasution/>

<https://smallholderagriculture.agsci.colostate.edu/ethiopia-diet-analysis/>

<https://smallholderagriculture.agsci.colostate.edu/1028-2/>

<https://smallholderagriculture.agsci.colostate.edu/affordability-of-improved-nutrition-while-optimizing-economic-opportunities/>

2. Part of the above concern is to look more at household needs than individual needs. That to improve the nutritional need of children, adolescent girls, nursing mothers s etc. who cannot be fully involved in economic activities someone in the household needs to be involved in heavy manual labor. To do this you need to aggregate the dietary needs for the entire household. The tendency is to look mostly at individuals.

3. The other concern is administrative overhead you are proposing in the Zero Draft. Please note that most of the countries you are concentrating on are what I refer to as Financially Suppressed Economies in which about 80% of earnings or food production is used just to feed the family. Thus, there is essentially no discretionary funds to provide a tax base for government to obtain the revenue to provide the services you are proposing. No taxes, no services. To expect a government to provide services beyond what they have the financial resources to fully fund, including the operations funds for officers to move about and diligently do their jobs, can quickly become a disservice to the general population. Too often it results in services being declared as provided based on the “honor/gratuity/baksheesh” system. This would limit the reliability of the service as I think is the case of the certified seed program in Keno, Nigeria. Unfortunately, no service is better than an unreliable service. Please be careful with the administrative overhead you are suggesting are affordable to host countries or make some notations about the financial viability of providing these services.

It should also be noted that administrative costs are far more associated with the number of people you must deal with rather than the volume. Thus, supervising food safety for large farms marketing produce in large 18-22-wheel trucks may be cost effective as was shown some 20 years go for the insecticide contaminated watermelons in Kern County, California. But would be prohibitively expensive for each ox-cart of produce being marketed by individual smallholders. Please be cautious with these administrative concerns.

Please review the webpages:

<https://smallholderagriculture.agsci.colostate.edu/financially-suppressed-economy-2/>

<https://smallholderagriculture.agsci.colostate.edu/financially-stalled-governments/>

<https://smallholderagriculture.agsci.colostate.edu/impact-of-financially-stalled-government-limited-variety-improvement-seed-certification/>

<https://smallholderagriculture.agsci.colostate.edu/informal-income-opportunities-seed-fertilizer-voucher-program-of-afghanistan/>

Thank you,

Dick Tinsley

## Thatchinamoorthy C, Annamalai University, India

Agriculture and Nutrition are interrelated. Agriculture is the most direct route to improving the diet of a person ensuring year-round access to adequate, safe and diverse nutrient-rich food. Nutrition is a basic human need and a prerequisite to a healthy life. Food security is a matter of utmost importance for every country for sustaining the developments and for attaining the future growth of society, maintaining political stability and living beings as a whole. Food and nutrition security are two sides of the same coin, however, the ways of achieving these two are different. Food security can be achieved by increasing food production and consumption of staple food. Nutrition security implies physical, economic and social access to balanced diet, clean drinking water, safe environment, and health care for every individual. Nutritional issues in India are complex and require all sectors to play. In this context, this paper focuses on the role of nutrition extension strategy, and its role in delivering nutrition solution. Extension strategy was evolved with the sample objectives of creating opportunities for knowing, discussing and action upon, in order that most of the unsolved problems can be solved, finally effecting a positive in the behaviour and practice. Some nutrition extension strategies for enhancing nutritional security such as, coordination and management of cross-sectoral policy, capacity building and nutrition planning and implementation, increasing and diversifying food supply through agro-ecological zonal farming systems based on comparative advantage analysis. Increasing food processing, preservation capacity, food standard and quality control, promoting accessibility to affordable and nutritious foods through the development of support physical infrastructure, improving domestic market access, promoting good health through improved nutrition and preventive care practices, promoting proper food and nutrition practices through information, education and communication, Improving food security and nutrition through effective research and development programme. We hope that, these extension strategies may be promoting in the nutritional security, in near future.

Identified Strategies

* Coordination & management of cross-sectoral policy & data base management.
* Capacity building & decentralization of the food & nutrition planning & implementation.
* Increasing & diversifying food supply through agro-ecological zonal farming systems based on comparative advantage analysis.
* Increasing food processing, preservation capacity, food standard & quality control.
* Promoting accessibility to affordable & nutritious foods through the development of support physical infrastructure.
* Improving domestic market access & export competitiveness through market integration & private sector participation.
* Improving nutrition status & social equity through gender mainstreaming & affirmative action support.
* Strengthening disaster management, food reserve & food monitoring mechanisms.
* Promoting good health through improved nutrition & preventive care practices.
* Promoting good nutrition & healthy lifestyles through improved health care & sanitation practices.
* Promoting proper food & nutrition practices through information, education & communication.
* Improving food security & nutrition through effective research & development programme.

## Thomas Oelholm, Norwegian Refugee Council, Norway

Below, moslty provides feedback from a humanitarian/crisis context perspective.

Crisis, food insecurity and food systems

Crisis due to conflict, climate or disaster caused by impact due to weather/geological causes should be distinguishable and be treated as impacting food systems in differing ways, yet be able to clearly state that these do not happen in isolation, but often are combined or amplifying each others impact. They should preferably not be treated as one system of impact but as a set of systems amplifying impact on food systems, food security and nutrition.

Complex crises are often prolonged and can last decades. In such type of contexts alternative food systems emerge under the influence of humanitarian actors, parties to a conflict etc. Such type of aid and/or political driven food systems are often social, environmental, political and economical compromised thereby undermining the ability to provide and enabling environment that can promote sustainable food systems, leaving the most vulnerable to food insecurity and malnutrition behind. A majority of people living in acute and/or chronic food insecurity and malnutrition live in or locations vulnerable to the combination of fragility, conflict and climate change. It is hence critical that the guidelines bring to attention the necessity for all stakeholders to face the conundrum and not only treat the crisis dimension as part of the political and economic domains, but also the social, climatic and environmental domains.

Guiding principles

Suggest to add

1. Paragraph C: “processing” to food production and consumption. Sustainable processing is as important as its production;
2. Paragraph F: clarification required - "sustainable vs resilient" -if something is sustainable does this implies that the food system being resilient. A resilient food system does nevertheless not imply it being sustainable, depending on the context and what being resilient to (e.g. persistence).
3. The guiding principles should preferable include a specific paragraph on minimise food waste and recycling of food waste and its by-products where waste can't be avoided;
4. The principles should have a statment that highlights the importance to protect local food systems. Larger/national/regiona/global food systems should not undermine them but support and strengthen them, yet prevent local food system becoming overly reliant on these larger food systems as this will undermine sustainability.

Further feedback

It is recommended to avoid referring to the term “resilient” unless directly associated to specific context. This is to avoid mixing up the distinguishable difference of a sustainable food system vs. a resilient food system.

Systemic food assistance should not only fill systemic gaps and reduce impact, but also address risks and hazards to prevent future crises and impacts. The guidelines will need to respect what the humanitarian mandate is and what it is not. It should not be a humanitarian responsibility to provide “sustainable” development assistance but enable pathways towards sustainability as fast as possible. Thus, the guidelines should where possible try to take into account the HDP nexus and NWOW developments, help clarifying what role the humanitarian, development and governance actors should take on before, during and after crisis in enabling, promoting and operationalizing sustainable food systems, primarily benefitting the local level and the local communities.

## Samuel Cauper Pinedo, Association Indigenous Center for Sustainable Development, Peru

¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030?

Rpta: la malnutrición y las causas, se refleja en el escenario de los pueblos indígenas para lograr metas 2030, un desafío y retos, es promover la política pública “Programa nacional de nutrición rural”, en base a programas de seguridad alimentario de producción agrícola (Productividad) en terrenos de las comunidades, más la capacitación nutricional según la intercultural de los costumbres y realidad alimentación de los pueblos indígenas.

¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?

Rpta: Las dietas saludables en los pueblos indígenas, básicamente son de origen de carnes, pescados y productos agrícolas “legumbres y menestras”, estos tres componentes lo complementan con ingredientes que se adquieren de tiendas comerciales “aceites y condimentos”. Por lo tanto los problemas subyacentes es la deficiencias y faltas de intervenciones de programas nacional alimenticias integral, asistencias técnicas y capacitaciones de seguridad alimentarias intensivas, para minimizar el problema de carencias alimenticias.

¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?

Rpta: Losprincipios rectores son “Asistencia alimentaria y nutricional de niños, niñas, mujeres”. Mi opinión es buscar propuesta integrador horizontal con las bases organizados, para funcionamientos de los principios rectores. No son más apropiados, porque se necesita primer a organizar los grupos.

## Dick Tinsley, Colorado State University, United States of America

Just a brief question. I recall the main documents mentioned concerns for saturated and trans fats, etc. If you are in economic environment where you need to exert more calories than you have access to, as most smallholder farmers are, will consuming saturated or trans fats be a problem, or will the need to energy result in their being quickly consumed? I think the concern for saturated or trans fats are more a concern of the obese than the starving.

## Manuel Moya, International Pediatric Association. TAG on Nutrition, Spain

Dear Sir, Dear Madam,

Please find attached my comments on this interesting document .

Yours Faithfully

Manuel Moya

Catedrático E de Pediatría/ E Professor & Head

FAO: Global Forum on Food Security & Nutrition member

Academician of the Real Academia de Medicina

University Miguel Hernández. Edificio Balmis

**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?**

Certainly.

1.BACKGROUND &: 2 Terminology, before malnutrition I’d suggest to add ‘the old and confusing term’; 4 Overweight &, after under-five I’d add ‘although already coexisting with overweight in LMIC’; 6 Malnutrition, after socioeconomic status I would add ‘and processed food vigorous marketing’

2. OBJECTIVES &: I’d suggest a new order: 20, 21, 22 and 23 are purposes whereas the rest could be objectives.

3. NATURE: OK

Comment: Guideline implies recommendations with a certain base out of rule concept, therefore some of the items that could be considered unworkable, should perhaps reassessed.

**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?**

1 KEY CONCEPTS. OK, only in 32 c) and d) and in the light of evidence I’d firmly consider the Astrup A et al article on the new approach of the WHO guidelines on saturated fat (BMJ 2019; 366: 14132) according to the new and solid results.

2 GUIDING P: 36, to leave only c), d), e), f), and g) could make clearer this idea.

**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?**

1 PRODUCTION SYS. OK, only in 43 policy-relevant c) genetic , I’d include genetic enriched foods (ie lysine in cereals)

2 Handling; 3 Processing & P: ok

(Comment. In my opinion the covered important subjects would be difficult to improve at least in my medical point of view.)

2.1 AVAILABILITY & P. 48 c) systemic food Assistance: is it appropriate its location here?

2.2 ECONOMIC ACCESS 50, perhaps redundant with policy-relevant [ a) to c) ]; 2.3 PROMOTION & ADV: OK and OK.

3 CONSUMER BEHAVIOUR. 55 perhaps mention adaptation according to socio-economic level and being basic.

C III, in summary bright and useful

**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 policy-making?**

1. Alliances are necessary but with a long-term duration idea. This requires a stable support, ie health visitors- school masters...‘Joint ventures’ can be ok but not looking for too short-term issues.

2. Na intake perhaps deserve a specific item because the greatest risk of CVD. See Flint AC et al. Effect of systolic and diastolic blood pressure on cardiovascular outcomes. N Eng J Med 2019; 381(3): 243-51. This was carried out on more than 1.3 million of people and see the reaction of food industry (Henney JE et al in the same weekly copy of N Eng J Med but in page 201

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

1 These Voluntary Guidelines should focus also at the step of stakeholders with specific actions out of their complete panorama seen at zero draft.

2 In my opinion stakeholders may require a perhaps reward such as scientific or altruistic recognition of their role

## Anthony Fardet, INRA, France

In a recent paper we elbaorated the three golden rules for protecting human health, animal biodiversity and welfare, and envrionment in all their dimensions:

Fardet A E Rock, Reductionist nutrition research has meaning only within the framework of holistic thinking. Advances in Nutrition 2018;9:655–670.

In details:

Rule 1: “Végétal” for Plant: consuming at least 85% calories from plantbased foods, limiting animal-based foods to 2-3 servings a day;

Rule 2: “Vrai” for Real: consuming at least 85% from real foods, limiting ultraprocessed foods to 1-2 servings/day;

Rule 3: “Varié” for Varied: varying real foods within cereals, legumes, vegetables, nuts, fruits, meats, fish, eggs and dairy.

Then, when possible, eat organic, local and seasonal.

This dietary pattern is closed to flexitarian diet, and in agreement with recommendations from FAO, EAT-Lancet commission, and French Agrimonde-Terra reports. It can be declined locally for each world region according to agricultural context. Within these rules, limiting animal-based and ultra-processed foods is a strong lever for human health, animal welfare and preservation of environment. Eat varied allows stimulating biodiversity. Notably, the production, transformation, and distribution of ultra-processed foods is particularly deleterious to the all planet.

tending towards the 3Vs golden rules should allow respecting both health, animal biodiversity and welfare, environment, small farmers, socioeconomics, and culinary traditions.

We think this a simple lever to improve food system sustainability.

## Siripen Iamurai, Objectif Science Organization, Geneva, Switzerland

Cartoon Animation to support Zero Hunger

One of the way to promote UN SDG topic2 to achieve the goal of Zero Hunger by using the cartoon media to deliver the knowledge to the new generation via theirs the most favorite media, which’s are suitable for their ages by physical to gain this knowledge into their mind in which might be generated to the long time memory.

We will be launching in the series of cartoon animation of which created by several concept of reservation of food environment and resources. Not only to promote this knowledge media to the young children in research operations in many countries, but they are submitting into the many film festivals 2019 in many counties. To extent more opportunities to access to out of target audiences to gain the knowledge which are delivered, now the 1st episode are launching in the name of “To Soil” and “To Soil Solution”, the primaries basic of planting process to produce the safety food for human and friendly environment to support sustainable agriculture.

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Cartoon%20Animation%20to%20support%20Zero%20Hunger.docx>

## Kivumbi Earnest Benjamin, Heal the Planet Global Organisation-HTP, Uganda

I am worried about GMOs and certain fertilisers that are not friendly to soil. How can we embrace GMOs which can not grown again by themselves. This is a major threat and some research link them to obesity, diabetes and cancers. [www.healdeplanet.org](http://www.healdeplanet.org)

## Chris Vogliano, Massey University, New Zealand

Dear Colleagues,

Please find my attached comments on V0 of the Draft Voluntary Guidelines. Hope these help.

Best wishes,

Chris

**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?**

Chapter 1 discusses the primary causes relating to malnutrition in a short and succinct fashion. It would help improve the scope of the chapter to include information regarding declining agrobiodiversity’s role in micronutrient inadequacy, as well as the rise of ultra-processed foods.

It may also help strengthen the five main categories towards delivering healthy diets (HLPE) by considering the inclusion of nutrition education, indigenous knowledge, and market forces (ie: adverts).

**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?**

Again, including indigenous knowledge transmission/preservation would be helpful for certain contexts. Additionally, ensuring that any approach considers cultural considerations and community inclusion for maximum benefit (versus only a top-down approach).

**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?**

Production systems: Comprehensive list. Would consider the inclusion of equitable livelihoods for all farmers, fair labour practices, and ethical treatment of livestock.

Handling storage and distribution: Food loss is more applicable here, as food waste typically happens at the end of supply chains (retail, consumer).

Retails and markets: include considerations for CSA (community supported agriculture) models, at home meal delivery services (blue apron) etc.

National Food Based Dietary guidelines: Could mention consumer education and promotion of sustainable food systems here.

**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 policy-making?**

Chile’s child marketing policies recently enacted are an excellent example of reducing children’s exposure to unhealthy advertisements.

The partnership between Unilever and WWF for their promotion of neglected and underutilized species (NUS) is an great example of alliances to promote food that’s good for people and the planet.

Ideal food systems would not only include caloric and economic considerations, but also nutrient-sensitive and ecologically minded considerations when making any future decisions. Metrics could include soil health indicators, nutrient densities, GHGe, etc.

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

If they were tied to a variety of implemented examples to help illuminate challenges and successes of each strategy. It might be helpful to create this document into a user-friendly format that asks a few introductory questions and leads the stakeholders to the correct sections.

Hope this helps!

## Vincent Gitz, CIFOR - Center for International Forestry Research - CGIAR Research Program on Forests Trees and Agroforestry (FTA), Indonesia

Dear CFS,

Thank you for the opportunity to contribute. Please find attached the contribution of the CGIAR Research Program on Forests, Trees and Agroforestry (FTA), using the template (contribution attached).

Looking forward to the developement of these important guidelines.

Best regards

Vincent Gitz, Director, FTA

The following submission has been prepared by the Forests, Trees and Agroforestry research program of the CGIAR (FTA) during its nutrition priority workshop. It builds upon the HLPE reports on Sustainable Forestry for Food Security and Nutrition (2017) and on Nutrition and Food systems and on other scientific publications, with main references listed in the end of this contribution.

**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?**

**General comments:**

* Chapter 1 adequately reflects the global current situation of malnutrition, proximate causes and impacts. There could be value in better showing that situations vary a lot between countries and groups. For instance the specificities of small island states, land locked countries, mountainous areas, as well as of indigenous and traditional food systems need to be mentioned.
* The food system dimension should be better framed; The underlying problems that currently hinder foods systems to deliver healthy diets are not described. It could be done by referring to the HLPE report. Different perspectives on why the food systems is failing are not addressed. Environmental focus needs to be highlighted, forests, oceans, natural resources etc.. It could include the parallel often made between planetary and human health. Nor is mentioned the critical role of investment by the private sector.

**1 and 4**: Too strong focus on nutrition and too little focus on diets, on foods, particularly in 1 and 4. E.g. It is not mentioned in number 4 that too little consumption of fruits and vegetables is also leading to diet-related non-communicable disease. Not only overweight and obesity is leading to NCD;

**7**. Could also be mentioned the effects of global changes, such as the impacts of deforestation on the diets of forest dependant populations, including indigenous peoples.

**9**. Missing drivers of negative behaviour, private sector should be mentioned

**10**. Technological processes/changes is missing;

**11**: This paragraph could deserve some rewording, in particular to distinguish people with high nutrient requirements and people that have low access/are more vulnerable.

**12**. Wording could be improved:, e.g. income is not a sector, gender is not a sector; there are no policies on income. Other sectors should be added – land use planning. The different agriculture sectors should be explicitly mentioned, like forestry, fisheries;

**18**. Could be added the need to ensure that it is sustainable.

**20.** add “diversity and” before “complexity”.

**24**. This paragraph would be better placed earlier in the text, for instance between paras 9 and 10.

**26**. Community based organizations could be added.

**28**. footnote 13 need to be corrected, the reference is HLPE. 2014. Food losses and waste in the context of sustainable food systems.

**32.** Focus on nutrient adequacy, but not much on diversity,

**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?**

Page 8: Guiding principles

The guiding principles contain principles that are more objectives, like c), d) and f) and others that are more means of interventions like a), b), e), g). There could be value in reorganizing the list. It would be good to add a guiding principle on “coordinated action” between different categories of actors, including partnerships.  
a) replace “maximize outcome”by “optimize outcome”   
 add “with particular attention to the trade-offs involved”

b) Replace “policies” by “policies and measures”.

d) Could be enlarged to vulnerable and marginalized groups, with “Equity and inclusiveness” as an objective.

e) Nutrition knowledge is an activity rather than a principle.

g) Capacity-building is again an action rather than a principle. With e) could be gathered under an aspect of integrated learning that also addresses learning loops

**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?**

General comments:

The organization of this part, by component of the food systems, risks not hide the links between them. In a determined food system, they interact and determine each other. It should be highlighted in the beginning and the end.

It also risks hiding the diversity of food systems, their specificities, specific constraints, challenges and opportunities. It should be emphasized in the beginning of the part, making explicit reference to the typology of food systems. It could mention the need to take into account the specificities of small island states, land locked countries, mountainous areas, as well as of indigenous and traditional food systems. It could also explicitly mention the need to build upon traditional healthy diets.

In general, this part seems to be very urban food systems oriented. It should recognize that in spite of growing urbanization an important part of the population, and an important of the undernourished and malnourished are rural. Rural food systems deserve equal attention, particularly those that are isolated, marginalized and/or confronted to changes in land use and diets. Solutions are likely to be very different from those for urban areas.

When “agriculture” covers also forestry, fisheries and aquaculture, as per FAO’s definition, there would be value in making it explicit for those who are not accustomed to FAO’s definition.

43. The list of policy relevant areas could be better organized, thematically and logically.

a) should explicitly mention agoecology and agroforestry.

b) add “for the different categories of the population”.

c) should explicitly mention agoecology and agroforestry.

Replace “crop varieties” by “plant species and varieties”.

Policy-relevant areas that refer to sustainable and diverse food production systems should be more explicit. They should for instance consider the inclusion of tree-based systems which provide direct and indirect benefits: around 74% of fruit produced globally are harvested from trees[1], which also produce nutritious leafy vegetables, nuts, seeds and edible oils. Surveys show that tree cover is positively associated with dietary diversity and fruit and vegetable consumption (Ickowitz et al. 2014). Moreover, the deep and extensive roots of trees make them more drought tolerant than annual crops, meaning they can provide food in dry periods when other food sources are not available (Jamnadass et al. 2011; Kehlenbeck et al. 2013). Tree foods have thus the potential to complement and diversify the predominantly staple-based diets of rural households through the year.

d) Need to integrate, either in this item or in the previous one the definition of agrobiodiversity:

“The variety and variability of animals, plants and micro-organisms that are used directly or indirectly for food and agriculture, including crops, livestock, forestry and fisheries. It comprises the diversity of genetic resources (varieties, breeds) and species used for food, fodder, fibre, fuel and pharmaceuticals. It also includes the diversity of non-harvested species that support production (soil micro-organisms, predators, pollinators), and those in the wider environment that support agro-ecosystems (agricultural, pastoral, forest and aquatic) as well as the diversity of the agro-ecosystems.” (FAO. 1999a. Agricultural Biodiversity, Multifunctional Character of Agriculture and Land Conference, Background Paper 1. Maastricht, Netherlands. September 1999.)

The title of this section could be “sustainable management and use of forests, aquatic resources and other wild resources to better cover their multiple contributions to food security and nutrition:

* As a direct source of food, not only complementary, but in many cases fundamental, see the HLPE report on fisheries and aquaculture for the contribution of aquatic resources to the nutrition of small island states, and of various categories of population and the HLPE report on sustainable forestry for FSN on the contribution of forest foods to forest dependent people.
* As a source of income (see the HLPE reports mentioned above)
* As providing other ecosystem services that are essential to all agriculture activities

e) could explicitly mention food trees and vegetables for which both knowledge and conservation efforts are lagging behind staple crops.

g) Women & gender issues are only discussed with reference to production systems, but they cut across the different aspects including marketing, distribution, availability, accessibility, and particularly social norms and values.

h) after “fruits”, add “nuts”. Need to also make explicit reference to the potential of numerous indigenous vegetables and tree crops, including so called “orphan crops” that need to be characterized, domesticated, and made available.

**47**. Misses the cultural and social dimension of the definition of “food environment” as it figures in para 30.Replace the last line by “towards food environments that are conducive to healthier diets and more sustainable food systems”.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

[1] Data for 2016, http://www.fao.org/faostat/en, accessed on 14 April 2019.

**48.** a) Important to consider also the specificities of food deserts and food swamps out of urban areas. Rural food systems deserve equal attention, particularly those that are isolated, marginalized and/or confronted to changes in land use and diets. Solutions are likely to be very different from those for urban areas.

**49**. first line, add “and isolated populations”.

**50.** c) social protection programs should be based on traditional diets that are supportive of local cultural food practices; risk of changing food cultures particularly with subsidies or in-kind transfers of staple foods.

**51.** Communication about food does not arrive in a vacuum. Need to relate it to Food Culture.

Labelling is not onlyfor young people; labeling of unhealthy foods is important for all segments of the population particularly with respect to sugary beverages and processed meats. Important also to communicate appropriate information about unpackaged food to avoid creating biases.

**52** B. or in 55. Idea for policies to improve desirablility of healthy foods such as ‘chef manifesto’ ; having celebrities market healthy foods.

**53**. Could link to sustainability in all its dimensions.

**55.** b) should be put first as the FBG should guide all actions towards consumers.

**56**. a) add “globalization”.

**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 policy-making?**

There are numerous examples of policies, interventions, initiatives, alliances and institutional arrangements which should be considered both in the HLPE report and in the consultations conducted for it.

Several types of initiatives are of particular interest:

Those that build upon national and local identity, food culture and specific food system including the revitalization of the Mediterranean diet, the Nordic diet initiative, the promotion of traditional and healthy diets and traditional foods in China, Korea, Japan.

Measures that support local food systems.

Measures that build upon traditional practices, like the community freezer program in inuit communities of Canada.

Initiatives that builds upon local agrobiodiversity to promote more diverse and nutritious diets. For instance:

* In Kenya, Bioversity International and its partners focused on conservation, capacity building and raising awareness of the nutritional and culture values of traditional vegetables. Demand for leafy vegetables in Kenya now outweighs supply, with an astonishing 1 100 percent increase in sales in just two years. Incomes have increased too, particularly where farmers have been successfully linked to markets, with women, the main producers of leafy vegetables, the main beneficiaries. In almost 80 percent of households surveyed, it was the women who kept the cash from the sale of leafy vegetables and who decided how
* it would be spent – mostly on more and better food and schooling for the children (Bioversity International, 2010).
* In Marrakech, the Global Diversity Foundation is restoring a school garden with the help of the staff and students of the Lalla Aouda Saadia School. The garden, which features both ornamental and edible plants, draws on Morocco’s rich cultural history. The project, which aims to reach 1 300 schoolgirls, will provide nutritious food for the students while teaching them about the environment and food traditions. The students take part in field research by interviewing Marrakech herbalists about important cultural recipes. http://tinyurl.com/6k6367p
* In the Federated States of Micronesia (FSM), a shift from traditional to imported foods over the past three decades has brought serious health problems to the region. Prior to the 1970s, there were no documented instances of vitamin A deficiency in FSM. By 2000, over 50 percent of all children under the age of five were deficient in vitamin A, a condition that often leads to childhood blindness and early death. The Island Food Community of Pohnpe initiated a “Let’s Go Local” campaign to promote important elements of nutrient analysis and conservation. It is particularly concerned with promoting foods that are rich in provitamin A carotenoids, especially beta-carotene. It has seen a significant increase in the consumption of indigenous bananas, taro and green vegetables in the target communities. www.islandfood.org/index.htm

Measures that promote diverse indigenous foods through the creation of new value chains, thus both improving the food security and nutrition of small producers by adding a new source of income and the nutrition of urban consumers by providing a new source of nutrient rich foods; like for instance Son tra in Vietnam. Son tra is an indigenous wild fruit tree species that grows naturally in forests around the Himalayas. In 2013, researchers from the World Agroforestry Centre (ICRAF) teamed up with the National Institute of Medicinal Materials in Hanoi, Vietnam, and identified in son tra fruit essential bioactive substances of polyphenols (key human dietary antioxidants) and triterpene acids, which have anti-inflammatory and antitumor properties. FTA helped domesticate the tree and expand the market for son tra, developing and commercializing novel products to overcome difficulties in consuming it fresh, allowing prices to be maintained, while supply increases because more farmers are growing the fruit. For farmers growing son tra alongside other crops, this has led to increased farm livelihoods and resilience to crop price shocks. Read more at blog.worldagroforestry.org/6625

As mentioned above, and shown by some of the examples above, the analysis of constraints, trade offs and synergies needs to be done in the food system, it cannot be reduced a priori to one of the components. More over it is generally in the system as a whole that actors need to be coordinated and need to find their own interest to act. One critical point to consider is the question of food prices. Some authors insist on the need for prices to be low, to facilitate access of the poorest to food. However, most of the poorest are food producers. On the contrary low food prices do not enable food producers to have a decent income that would them to have a diversified and healthy notr to invest for future food production. Therefore access of the poorest to food should be assured by other means than a low price, like for instance social protection and ultimately poverty eradication to which a healthy and remunerative food sector is a key contributor.

The ideal food system is well envisioned by the HLPE definition of sustainable food systems: “A sustainable food system (SFS) is a food system that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations are not compromised.” Meaning that it provides healthy diets for all, including the poorest, while providing enough income to food producers that they themselves can benefit from a good standard of living conducive to health and good nutrition and can invest for future food production, while sustainably managing the natural resources on which food production depends.

With the adoption of the SDGs the global community has already a clear set of targets and indicators to orient its action. However, it may be necessary to identify, for a determined food system, what are the priorities, the most critical points to address and to select specific targets and indicators reflecting these priorities.

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

These Voluntary guidelines could, along with a strong evidence base, ground a shared understanding of the situation of a specific food system, what needs to be done and how it can be achieved.

They can facilitate the implementation of FBDGs as well as the design of policies and measures that support their implementation.

They can guide the action of public authorities responsible for the design and implementation of policies related to food systems.

They can facilitate collective and coordinated action of diverse categories of actors.

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## Esther Yeboah Akoto, Kwame Nkrumah University of Science and Technology, Ghana

Dear Committee,

I have also taken a critical review of the zero draft. It appears great to make the next stage. I only found an error (peoples instead of people).

It is great to progress to the next level.

Thank you

Esther Yeboah Akoto

In-document comments:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/CFS_Zero_Draft_Voluntary_Guidelines_Food_Systems_and_Nutrition1.pdf>

## Sonia Blaney, Professeur de nutrition, Canada

Bonjour,

Ci-joints mes commentaires insérés dans le document ci-joint.

Sonia Blaney

Template: <http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/MZ841_CFS_Food_Systems_Nutrition_Zero_Draft_fr_SBlaney.pdf>

## Makhosi Mahlangu, African Food Revolution, Italy

We have been researching what our forefathers consumed previously and have found that Indigenous African Foods offer a possible solution to alleviate the food crisis in Sub-Saharan Africa.

There has been very little research on Indigenous African Foods from a nutritional value perspective. We are currently working on the characterization of common indigenous foods from Zimbabwe with emphasis on the protein, vitamin, oil, carbohydrate, and mineral content. Many indigenous recipes that were used previously have slowly become extinct and the African Food Revolution is working on research and documentation of Indigenous African Foods.

We firmly believe that with local resource management, a food secure Africa is attainable. [www.africanfoodrevolution.org](http://www.africanfoodrevolution.org)

## Erand Llanaj, Department of Preventive Medicine, Faculty of Public Health, University of Debrecen, Hungary

**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?**

Chapter 1 addresses more or less the current situation. However, it would be great if the call and description be more dramatic in the sense that show how food systems now face severe biophysical constraints on achieving food security and optimal, healthy and sustainable nutrition, with increases in agricultural production  slowing because of climate disruption, yields and nutritional quality of crops being threatened by the loss of pollinators, growing atmospheric CO2 concentrations, fertile soil being lost to both wind- and water-caused erosion, salinization, and nutrient depletion, groundwater supplies for irrigation are increasingly limited as a consequence of overpumping and contamination of aquifers, excessive applications of pesticides and fertilizers have contributed to dangerous levels of exposure to toxic substances, pollinators are declining rapidly as a result of climate disruption, poisons in the environment, and habitat destruction as a result of changing land-use practices. So the attempt to frame the issue of food security and healthy nutrition as either “the solution lies in more equitable distribution of food” or “there are too many people and not enough planet,” miss an essential factor that links these two viewpoints: achieving the forms of governance needed to more equitably distribute resources becomes ever more difficult on a more crowded and degraded planet. Meeting the challenge of food security and optimal and sustainable nutrition demands a revolutionary change in food systems, necessarily one as far-reaching as a combination of the agricultural revolution, now 10 millennia in the past, with the industrial revolution and the multiple transitions to more democratic governance that started three centuries ago. So the drama should be in the sense that the problem is very very serious - not that it is not presented that way, but there is always some room for increasing importance.

**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?**

Policy makers around the world should be urged to move food and nutrition to the top of their political agendas. Anything less is a recipe for disaster and a balanced diet must be in line with changes in our food systems - both in the demand and supply side! If we look closely at our diets, most of us will realize plenty of our food does not fit this criteria. EAT-Lancet report made an effort, but your efforts can amplify and solidify action within the Decade of Action on Nutrition Framework. Governments should assume responsibility for the international impacts of their food systems policy decisions. The food sovereignty of other countries should be respected. Policies should enable self-supply of the population with healthy food and should promote the protection of resources, the climate, biodiversity and animal welfare. Strengthening rural structures, local economies, labor rights and small-scale food producers, establishing public programs that provide locally produced food, applying stringent standards for food labeling and the regulation of unhealthy products and paying special attention to the first 1,000 days of life as the starting point of a good and healthy well-being are core elements of such a political framework. Breastfeeding!!!

**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?**

Nutrition sensitive policies should aim to improve the underlying determinants of nutrition outcomes through targeting dietary quality, household food security, income generation and women’s empowerment (very important!!!). Some entry points can be inspired by the  'Strengthening Nutrition Action: A Resource Guide for Countries Based on the Policy Recommendations of the Second International Conference on Nutrition (ICN2)' themes. Some language can be added for the demonstrated potential of how nutrition-sensitive interventions influence and improve intermediate outcomes such as dietary diversity, women’s empowerment and the consumption of environmental-sustanable and healthy foods - this in return can help identifiy the needs to continue supporting and conducting research and scaling up actions in theses critical areas to support efforts to meet the globally agreed sustainable development goals. Chapter three can create a vision and help policy makers looking forward to the future governments, international donors and development organisations and how they should be encouraged, nudged and supported to implement nutrition-sensitive agriculture interventions and strategies to achieve their development goals related to the food security, healthy and sustanable nutrition, as well as eradicate poverty and achieve SDGs.

**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 policy-making?**

Oh boy, this is a great question! In order to have sustainable, equitable, and healthy food systems for the future it would be required to integrate analytical methods and approaches from a range of disciplines, as well as effective intersectoral policy analysis and multi-stakeholder engagement, including private sector - which to be honest I am not fan of! My take is that if we have a 'population health - centered' food system we can be able to address food systems challenges, especially as nutrition-related NCDs such as obesity, diabetes, cardiovascular disease, and some forms of cancer are major contributors to the global burden of disease. If we can shopw governments and people how changes in food system will be translated in changes in health, perhaps we can have some leverage and create some hope! For metrics, traditionally, components of production and consumption systems can be used to assess or improve the efficiency of a particular element or activity within the food system, based on the assumption that this will also improve the efficiency of the whole system - very important principle to keep in mind! Food systems approach must identify, analyse and assess the impact and feedback of the systems different actors, activities and health and nutrition outcomes to help identify intervention points for enhancing health and nutrition sustainably.  Therefore considering the bigger picture of the food system that it is not only a sum of the basic elements of how we get our food from farm to table, but also all of the processes and complex infrastructure involved in producing, bringing and distributing food for a specific population. I do not know if I make sense!

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

To be honest voluntary guidelines alone will be insufficient to improve food environments and food systems, but with the endorsement of CFS and other organizations more attention will be paid to reducing social, cultural, political and economic barriers that can help develop leadership and capacity to ensure the sustainable changes expected for food systems to achieve SDGs. Apart from serving as referecne point this may be the value! I hope for the best.

In-document comments: <http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/CFS_Zero_Draft_Voluntary_Guidelines_Food_Systems_and_Nutrition_Erand%20Llanaj%20input.pdf>

## Tim Lobstein, World Obesity federation, United Kingdom

Thanks for the opportunity to comment. The draft is an excellent start. We have commented in the template about the need for a greater focus on food sytems producing obesity and climate crisis, and the role of the commercial sector.

Tim Lobstein for World Obesity Federation

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?**

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).

**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?**

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.

**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?**

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.

**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 policy-making?**

No comments

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

No comments

## Jesús Guzmán Flores, Centro de Estudios para el Desarrollo Rural y la Soberanía Alimentaria, Mexico

Estimado CSA

Agradezco el espacio para poder opinar sobre el borrador cero de las Directrices Voluntarias sobre los Sistemas Alimentarios.

Considero de la mayor importancia tener en cuenta a los sistemas alimentarios de los pueblos indígenas en la formulación de las directrices voluntarias; por lo que anexo mis opiniones y sugerencias en el formato del proceso normativo.

Saludos

**1. ¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030? ¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?**

En el caso de los Sistemas Alimentarios de los Pueblos Indígenas, hace falta mencionar lo siguiente:

* La ocupación de sus territorios de los pueblos indígenas para el desarrollo de proyectos de explotación minera e hidrocarburos y de construcción de presas, afectan a sus sistemas de producción de alimentos y por ende la obtención de dietas saludables.
* También la promoción para que los productores indígenas reconviertan sus sistemas de policultivo hacia el monocultivo de especies comerciales (café, caña de azúcar, hule y palma de aceite, entre otros) limitan la producción de las múltiples especies que proporcionaron alimentos para sus dietas tradicionales.
* La inducción por la publicidad y la oferta amplia de alimentos ultraprocesados, han contribuido a la modificación de las dietas, provocando malnutrición en la población indígena y rural en general.
* Los tratados comerciales contienen disposiciones para ampliar los plazos y derechos de la propiedad intelectual, que de manera específica en lo que se refiere al libre acceso a las semillas, implica adoptar la UPOV 91, la cual contiene disposiciones que limitan el derecho que tienen los productores indígenas y campesinos en general, de producir, guardar e intercambiar las semillas de las especie que les pueda ser útil para su alimentación, ya sea de especies nativas o exóticas que adaptan a los ecosistemas en donde se ubican sus unidades productivas.

**2. ¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?**

Los sistemas alimentarios de los pueblos indígenas se caracterizan por el amplio uso de la agrobiodiversidad de los ecosistemas en que su ubican, tienen una alta capacidad de adaptación a cambios en el clima y en los sistemas socioeconómicos donde se desenvuelven y, las tecnologías que utilizan, en general, son de bajo impacto con el medio ambiente. Además, la distribución y el consumo de alimentos, guardan una estrecha relación con su cultura y se orientan a la atención de las necesidades de alimentación de la totalidad de los integrantes de las comunidades indígenas.

Por lo anterior estimo conveniente se incluya como principio rector:

**Atención especial a los sistemas alimentarios de los pueblos indígenas.** Garantizar que los pueblos indígenas mantengan sus sistemas alimentarios, a partir del respeto y su protección, así como proporcionar apoyos para su mejora.

Estimo conveniente que en el apartado 1 de los conceptos clave relativos a los sistemas alimentarios y la nutrición, en el párrafo 33 se amplié el alcance del derecho a la alimentación, considerando el derecho a producir directamente sus alimentos, pues en el caso de los pueblos indígenas y comunidades campesinas, todavía la producción para el autoconsumo, continúa siendo una de las principales características de sus sistemas alimentarios.

Considero que los principios rectores propuestos son útiles para la definición de las directrices voluntarias para que los sistemas alimentarios de los pueblos indígenas sean sostenibles, aporten a dietas saludables y mejoren la nutrición de los indígenas.

**3. Considerando los ámbitos normativos identificados en el capítulo 3 y los factores propicios sugeridos en el párrafo 41 del borrador cero, ¿cuáles son los primeros pasos normativos que deberían analizarse en el capítulo 3, teniendo en cuenta la necesidad de fomentar la coherencia de las políticas y abordar su fragmentación?**

En el caso de México, que tiene reconocida en su Constitución Política el derecho a la alimentación adecuada, se estima que la aprobación de una ley reglamentaria, puede ser un instrumento normativo que de coherencia y evite la fragmentación de las políticas públicas. Pues las propuestas que se han realizado hasta el momento, se orientan a establecer disposiciones generales para todos los elementos que conforman el sistema alimentario mexicano, con sus diferentes modalidades, para que sean el eje de la garantía del derecho humano a la alimentación y a la nutrición saludable.

Las directrices voluntarias deben insistir en la importancia de legislar para el reconocimiento del derecho a la alimentación de acuerdo a los marcos normativos de cada país.

**4. ¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?**

Aunque no es un ejemplo nuevo, se tiene una experiencia exitosa en materia de seguridad alimentaria, que se considera conveniente exponer. Esta se realizó a principios de los años ochenta del siglo pasado y consistió en ejecutar un programa de abasto para garantizar la disponibilidad y accesibilidad de alimentos en las áreas rurales, con prioridad en los territorios de los pueblos indígenas de México.

El programa tuvo como estrategia para su realización el considerar la participación de las comunidades que se beneficiaría con los servicios de abasto alimentario. Esta participación se iniciaba con el pedir el consentimiento de la comunidad para la instalación de los centros de distribución de alimentos y de otros bienes de consumo generalizado; de otorgarse el consentimiento, se establecían compromisos de participación de aportaciones de la comunidad para la instalación, operación, vigilancia y evaluación de los centros de distribución y del programa en su conjunto.

La propuesta de participación comunitaria y el esquema de corresponsabilidad gobierno-comunidad en la operación y evaluación del programa, ha sido la base para que cuarenta años después, el programa continúe.

Lo anterior, nos permite proponer los siguientes principios rectores, al menos para los pueblos indígenas, el **consultar de manera previa a los beneficiarios sobre las acciones públicas dirigidas a la mejora de los sistemas alimentarios** y, el **considerar esquemas de corresponsabilidad en la realización de esas acciones públicas.**

En la transformación de los sistemas alimentarios consideró que los principales desafíos son: la mejora y fortalecimiento de los sistemas alimentarios con base en las condiciones de cada una de las regiones de los países; que se reconozca la diversidad de sistemas de producción de alimentos y que promueva su reconversión a sistemas más sostenibles en sus dimensiones ambiental, económica y social; que se garantice la inocuidad de los alimentos y su calidad nutritiva; que promueva esquemas de distribución eficientes que faciliten la accesibilidad de los alimentos y que se orienten a distribuir la producción de cada región y, de manera fundamental, que se apoye a que las dietas incluyan componentes frescos y con el balance que permita superar la malnutrición.

Los indicadores sobre el estado de salud y la nutrición de la población considero que son los fundamentales para definir las prioridades de las políticas, así como, para medir los resultados de su ejecución.En México se realiza una encuesta nacional de salud y nutrición que aporta elementos fundamentales para conocer cuál es la condición que tiene su población en esas materias.

**5. ¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?**

Primero, que se realice una amplia difusión de las Directrices voluntarias, de sus objetivos y de los impactos que se esperan si los países las aplican.

Segundo, difundir las experiencias de su aplicación en los países, resaltando no solo los logros, sino también los retos que afrontaron y como los superaron. Para lo anterior propongo que este foro global cuente con un espacio de intercambio de experiencias sobre la transformación de los sistemas alimentarios**.**

## Gédéon Bakerethi, WWF RDC, Democratic Republic of the Congo

Nous devons ajouter aussi ,la problématique de l'utilisation des emballages non biodégradable(sachet) utilisés en afrique dans les marchés pour faciliter le tansports des aliments dont la gestion devient aussi une menace dans les bonnes pratiques de recyclages des dechets.

Des alternatives doivent etre développés et vulgariser pour la reduction de l'utilsation des emballages non biodégradable dans le menage.

Par exemble:

Utilisation des emballages à papier

Des paniers à usage multible,

Des emballages réutilisable,...

Gédéon Bakerethi WWF RDC

## Corné van Dooren, Netherlands Nutrition Centre, Netherlands

Dear all,

I welcome the initiative for those guidelines.

My first comment is about the name: guidelines are by definition voluntary, so it is not necessary to include 'voluntary' in the title.

Background and rationale.

The focus is on health, missing in 9. a delivering of healthy diets and reduce their impact on the planet, and in 10. diets that meet the planetary boundaries.

One of the objectives (18.) should include the discourage of overconsumption and the prevention of obesity.

21. Not only issues on genetic resources, but also natural resources and minerals.

Key concepts: please add the FAO (2010) definition on sustainable diets.

Overall add healthy and sustainable diets (36e, 41, 43b)

43b: minimizing the inputs, but also the outputs (pollution, greenhouse gas emission, etc).

43c: Sustainable use of agro diversity, does also mean fitting into local climate, soil and water resources. Missing the issue of soil degradation,

43i: Climate change also affects the harvests and yields.

44. About food waste. For consumers proper cooking, preparation and shopping is also crucial. Policy relevance in more higher income countries has to focus on the issue of food waste in households (as main waster) by policies on smart shopping, storing and preparing.

45. Packaging should also refer to the importance to reduce the impact on the environment and the promotion of recycling.

46b focuses on the production of local foods. This should include foods in season accomplished with some food from other regions with the lowest impact on the environment.

Restrict the marketing of products high in saturated fats, added sugar and salt. Essential fatty acids should be promoted, as well as fruits with natural sugars.

51b. There should also be transparency on environmental labels, including independent audits and high standards.

55b. Please add as example on food based dietary guidelines, that more and more countries include guidelines on sustainability issues, i.e. promoting fresh, local and seasonal products and not ultra processed foods and promoting a balance between protein from plant-based sources and animal-based sources.

55.c Nutritional education could include production methods, school gardens and increasing connections between producers and consumers.

## Yvonne Colomer, Triptolemos Foundation, Spain

Dear Sirs,

We are very glad to participate in this forum on food loss and waste reduction in Europe and Central Asia.

One of our concerns on this issue is the lack of rigorous data and its relationship to the specific stages of the process.

On this we have published the work "Food availability databases: statistical gap and proposals for improvement" that we attach:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Quaderns%20agraris%20num%2046%20BASES%20DE%20DADES%20DE%20DISPONIBILITAT%20ALIMENT%C3%80RIA_0.pdf> .

Best wishes

Yvonne Colomer

## Rosemary Navarrete, Private Sector Mechanism, Italy

On behalf of the Private Sector Mechanism, we would like to highlight the Policy Recommendations attached, which were compiled with the aim of ensuring the Voluntary Guidelines on Food System and Nutrition are both implementable and transformative. We look forward to participants' feedback and thank the secretariat in advance for their consideration.

**PSM Policy Recommendations for CFS Voluntary Guidelines on Food System and Nutrition**

Key Policy Recommendations:

1. **Join Up Policies**: Strengthen the **integration** of nutrition within national policies, programs and budgets through enhanced coordination across sectors, including agriculture, environment, energy, water, sanitation and hygiene (WASH), health, education, fiscal policies, economic and social development.

2. **Food Losses and Waste**: To reduce **food losses and waste**, Policies must focus on educating all food systems stakeholders to prioritize the reduction of food loss and waste, improve public and private infrastructure for wellfunctioning and efficient food systems by investing in storage facilities, food processing and packaging, energy availability, transportation, access to telecommunication and other infrastructure and closing the data gap by improving data collection and analysis for accurate assessment of the scale of losses at national and local levels.

3. **Address Climate Change**: Stimulate the development and adoption of innovative practices to support the transition of all forms of agriculture systems to become **climate-smart** which anticipates the impacts of, adapt and build resiliency to and mitigate climate change including focusing on creating economic benefits to encourage efficient and sustainable use of new technologies and key resources across food supply chain with a focus on developing countries and SMEs.

4. **Link Smallholders to Markets**: Support value chain development that links smallholder farmers, and the informal food production sector, directly to the formal **food processing and packaging sector** thus providing smallholder farmers’ increased income, improving the accessibility of **local & traditional** food supply whilst improving and safeguarding food safety and nutritional value of foods

5. **Women’s Empowerment**: Improve nutritional outcome by enhancing **women’s** rights and empowerment in agriculture– including contributing to decision-making, facilitating women’s access to opportunities to generate income, increasing their participation in decisions on the use of household income, reforming to support land ownership, access to finance and promote a more equitable division of time and labour needed to ensure better nutrition.

6. Capacity Building: Support building and mobilizing sufficient resources in all sectors to formulate coherent policies and design, implement and monitor investments aimed at healthy food systems across sectors including investments in human and institutional capacity at all levels, and particularly in developing countries. 7. Investing in Nutrition: Increase responsible and sustainable investment in nutrition, especially at country level such as investment in school nutrition programmes to create demand for nutritious foods and build healthy eating habits from a young age; generate additional resources through innovative financing tools; engage development partners to increase Official Development Assistance in nutrition and foster private investments as appropriate.

8. **Data Collection & Monitoring**: Policies should be drafted based on data and sound science on food systems and nutrition. This requires funding for data gathering, analysis, research, developing metrics and reporting data and in particular on the diets of the population, on a disaggregated data as well the quality of food environments. Support follow-up and review mechanism for monitoring data within countries and across regions.

9. **Food Safety**: Integrate food safety policymaking with agriculture and nutrition policymaking to achieve greater policy coherence to deliver safe and adequate quality food with a focus on strengthening research on foodborne diseases, harmonization of food safety policies at global level, supported by national/local monitoring and control systems, building human, institutional and systemic capacities and appropriate actions in the consumer, trade and market and food production domain.

10.**Facilitate Trade in Food**: Enable movement of food through trade to help further food & nutrition security and dietary diversity, address climate change and extreme weather, reduce poverty, advancing broad-based and sustainable economic growth, supporting jobs, raising living standards, expanding the variety of products available to consumers, and helping people everywhere get accessible safe, affordable, nutritious food

11. **Consumer Education and Marketing**: Support to empower individuals to make informed choices by providing an enabling environment, strengthening health literacy through education, and implementing population-wide and targeted mass and social media campaigns that educate the public about healthy and balanced sustainable diets, and reduce sedentary behaviour. Endorse a responsible approach to food and beverage marketing to children, through a variety of approaches, including self- and co- pg. 3 regulatory measures, as well as regulatory frameworks, appropriate to the specific national context.

12.**Labelling**: Recommend a evidence-based front of pack **labelling** system that clearly provides information required to select products at the time of purchase or consumption, ensuring that: consumers are transparently informed of nutritional information and companies are motivated to improve product formulation. 1

3. **Evidence based Policies**: Ensure all **economic** incentives and disincentives to promote healthy diverse diets are science and evidencebased with continuous monitoring of indented outcomes.

14.**Innovation**: Encourage governments to create an enabling environment and invest in research and innovation that support product transformation to protect or add nutritional value along food chains such as reformulation, fortification, and biofortification.

15.**Inclusion**: Encourage policy measures and instruments that empower *farmers* including in developing countries to produce and deliver safe, affordable, and nutritious food. Special attention must be given to the needs and involvement of **youth**, our farmers of the future.

16.**Technology Development & Adoption**: Promote and foster the development of innovative technology to support the food system transformation in particular technologies that support sustainable food production, improve food safety, support capacity building, consumer education, improve productivity and infrastructure.

17.**Partnering for Outcomes**: Support multi-stakeholder **partnerships**, including public-private and private-private partnerships for improved nutrition while giving due regard to managing conflicts of interest, through due diligence to accelerate progress and reduce all forms of malnutrition These types of partnership could be vital in sharing experiences, technologies and knowledge, and in mobilizing domestic and foreign public and private resources.

## Juliana Sánchez Castellanos, Fundación Gaia Amazonas, Colombia

Adjuntamos el documento con las contribuciones generadas por nuestro equipo.

Agradecemos el habernos tenido en cuenta y quedamos atentos,

Juliana Sánchez Castellanos

Asesora en Género

Fundación Gaia Amazonas

**1. ¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030? ¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?**

**Los aportes a continuación están relacionados con los sistemas alimentarios indígenas amazónicos**, en la medida en que, como lo señala el Equipo de Pueblos Indígenas de la FAO, hasta el momento las directrices voluntarias sobre los sistemas alimentarios y la nutrición son muy detalladas sobre su dimensión comercial, pero no atienden las particularidades de los sistemas alimentarios indígenas y los conocimientos tradicionales sobre los que estos se sustentan, los cuales presentan, como dicho equipo subraya, “importantes contribuciones conceptuales que no se han incluido en este borrador”, y que han demostrado, en una realidad evidente de cambio climático, “ser sostenibles, resistentes y adaptables”.

Entre estas contribuciones conceptuales, y con el ánimo de complementar las enunciadas en los comentarios del Equipo de Pueblos Indígenas de la FAO desde nuestra experiencia en el acompañamiento a las poblaciones indígenas en el nororiente amazónico, destacamos las siguientes:

* Los sistemas alimentarios indígenas se enmarcan en un sistema más amplio de manejo territorial del cual depende el balance ecológico.
* Las actividades asociadas al alimento no son solo técnicas que conducen a resolver necesidades materiales, sino que son un entramado de prácticas, saberes y comportamientos en las que se repiten interacciones con seres no humanos (plantas, animales y minerales) y otras entidades (dueños espirituales de los elementos de la naturaleza), integrando conocimientos, saberes y prácticas que son propios de mujeres y hombres, de manera complementaria e interdependiente.
* Los sistemas alimentarios indígenas amazónicos se fundamentan en la relación interdependiente entre la memoria, la producción y la nutrición. La memoria conecta al sujeto con el colectivo del que hace parte, en cuanto es la herencia de ese entramado de conocimientos, saberes y prácticas asociados a la recolección, caza y pesca y a la producción del alimento cultivado (desde la selección del suelo, a la identificación de las semillas, siembra, manejo de la cosecha, y transformación de los alimentos). Esa memoria se mantiene en el hacer del día a día, y en el retorno constante a las historias de origen, de donde surgen las pautas para el manejo de dicho sistema. Esto es memoria en palabra, relato y acción. Esta memoria está también relacionada con el sistema de parentesco y la organización social de los pueblos indígenas en el caso amazónico, donde el conocimiento chamánico para el manejo del mundo se hereda por vía paterna, y las semillas y manejo de las mismas se heredan por vía materna.
* La producción del alimento es vista como una relación de filiación con la tierra cultivada, de alianza entre el cazador y su presa, y de reproducción de unas pautas de manejo y de un sistema de vida (Descola, 2012).

En esa medida, el Informe del Grupo de Alto Nivel de Expertos en Seguridad Alimentaria y Nutrición se fundamenta en un marco conceptual que no es suficiente a la hora de caracterizar los sistemas alimentarios existentes en el mundo. La tipología que propone el GANESAN (sistemas alimentarios tradicionales, sistemas alimentarios mixtos y sistemas alimentarios modernos) describe fenómenos sociales limitados, y existentes únicamente en culturas modernas y occidentales, donde la naturaleza es entendida como un medio (un objeto-recurso susceptible de ser explotada) y las colectividades humanas en tanto sujetos que se apropian de ella para vivir. Tal como se señala en los comentarios del Equipo de Pueblos Indígenas de la FAO, esta tipología contempla sistemas antropocéntricos, y deja por fuera un abanico enorme de maneras de relacionarse con el ambiente y concebir el alimento y la nutrición.

En coherencia con lo anterior, el capítulo 1 de las Directrices Voluntarias sobre los Sistemas Alimentarios y la Nutrición no refleja la situación actual de malnutrición y las causas y efectos relacionados. Es importante entender que la definición de “nutricio” no es un universal, ni la biomedicina es el único conocimiento legítimo a la hora de catalogar una dieta como saludable o no. De manera análoga existen diferentes nociones sobre la salud y la enfermedad, sustentadas en diversas maneras de concebir el cuerpo y la naturaleza. Estas nociones se enmarcan, a su vez, en una concepción holística de manejo territorial, abarcando la integralidad de las interrelaciones (ecosistémicas, sociales y de orden espiritual) en pro del bienestar de la gente y su entorno.

Asimismo, los indicadores y métricas empleados para medir la malnutrición, desnutrición y carencia de micronutrientes pertenecen a una epistemología particular, la moderna occidental, y por ende resultan hegemónicos y poco descriptivos al ser usados para comprender sistemas alimentarios indígenas, y coloniales a la hora de emplearse en la formulación de estrategias de intervención en contextos socioculturales diferenciados. De igual manera, es necesario formular políticas que contribuyan a dejar de construir periferias en contraposición a centros de conocimiento y poder; un buen paso al respecto sería dejar de asociar “tradicional” con “precario”, pues los sistemas alimentarios indígenas no son sistemas de subsistencia, todo lo contrario, se caracterizan por su diversidad, variedad y abundancia.

Al formular marcos conceptuales diferenciados e incluyentes es posible que las políticas derivadas sean menos asistenciales y más interculturales e inter-epistémicas, menos deterministas y más holísticas, contemplando la necesidad y pertinencia de defender los derechos territoriales de las colectividades indígenas, promoviendo una participación política efectiva de estos grupos, y favoreciendo esquemas de gobernanza no hegemónica que los incluyan de manera real. Lo anterior entendiendo que el tema de la alimentación está atravesado por la cultura, los sistemas de producción, la distribución de la tierra y, debe agregarse, la legitimación de ciertas formas de entender y estar en el mundo por sobre otras posibles. Más que diseñar intervenciones que coordinen diferentes sectores, se deben favorecer acciones que den lugar a las diferentes agencias de los pueblos indígenas, trascendiendo la retórica del re-conocimiento y el multiculturalismo (reconociendo derechos a la vez que se imponen límites para su ejercicio efectivo) (Bonilla, 2006; Abello, 2012: 114; Lopera y Dover, 2013: 82; Hale, 2005: 14), y abogando por generar las condiciones para que sus epistemologías y lógicas de acción sean realmente consideradas en la formulación de políticas a diferentes escalas.

En lo que respecta a los objetivos y metas de la Agenda 2030, estos son de difícil cumplimiento en la medida en que no se garanticen mecanismos de salvaguardia de los sistemas alimentarios indígenas en tanto sistemas de uso de la biodiversidad, y de sus conocimientos asociados como patrimonio inmaterial de la humanidad. Al respecto, deben llevarse a cabo acciones afirmativas que garanticen la soberanía y autonomía alimentaria de los pueblos indígenas, en el marco de un respeto a su derecho a la autodeterminación y por encima de un enfoque que promueva la sola seguridad alimentaria (entendida en términos de acceso a los alimentos sin cuestionar su procedencia). Estrategias que promuevan el intercambio y recuperación de semillas y conocimientos de manejo ambiental deben primar por sobre estrategias que dependen de la articulación de las colectividades indígenas con el capitalismo, incluso si este es un capitalismo proteccionista y de Estado. La razón de esto es muy sencilla: en el momento en que la naturaleza se concibe como valor de cambio y se mercantiliza, la relación que establece cualquier grupo social con ella deja de ser biocéntrica y empieza a ser antropocéntrica, por lo tanto el sistema alimentario indígena se ve en enorme riesgo.

Los sistemas alimentarios no indígenas han fracasado a la hora de proporcionar dietas saludables porque no sostienen una relación con la naturaleza que se base en los principios de reciprocidad y equilibrio, frente a lo cual los sistemas alimentarios indígenas tienen mucha más claridad al respecto. En la misma línea la combinación de diferentes formas de consecución del alimento (por ejemplo la cacería, pesca, recolección y horticultura en el caso amazónico) y la diversificación de medios y técnicas redunda en la generación de intercambios ecológicos con la naturaleza que respetan los ciclos bio-geo-químicos de la misma. Desde esta perspectiva, los sistemas de conocimiento indígena son mucho más ricos y detallados en su lectura de las relaciones entre los diferentes seres vivos, y es sobre esta lectura que accionan, tanto a un nivel espiritual (que da cuenta del lazo místico y vital que une al hombre con la tierra de la cual depende su supervivencia) como a un nivel material.

El principal rasgo de los sistemas alimentarios indígenas es su heterogeneidad y su complejidad sistémica, pues ésta abarca prácticas forestales como las nombradas arriba, de tal forma que la unidad doméstica familiar indígena (sea la familia extensa como en el caso amazónico, o unifamiliar como en otros casos) cuenta con todo lo necesario -habitación, infraestructura, utensilios, alimento, salud, entre otros- para vivir gracias a su trabajo y a la reciprocidad que mantiene con la naturaleza. En este sentido la selva, en tanto paisaje antropogénico, se debe entender como un sistema integrado que, lejos de poder conservarse prístino e intocable, depende de la interacción del ser humano con su entorno como uno entre otros agentes parte.

**2. ¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?**

Los principios rectores propuestos en el capítulo 2, a saber: a) enfoque sistémico, integral y basado en hechos comprobados; b) políticas coherentes y específicas de cada contexto; c) personas sanas en un planeta sano; d) igualdad de género y empoderamiento de la mujer; y f) realización del derecho a la alimentación, son todos ellos pertinentes y adecuados al contexto nacional colombiano y al contexto local del noroeste de la pan-amazonía (zona donde la Fundación Gaia ha adelantado su trabajo de acompañamiento a gobiernos indígenas).

Sin embargo, los principios e) conocimientos y sensibilización sobre nutrición, y g) creación de capacidad, tal y como están descritos, no parecieran adecuados en términos culturales, ya que los sistemas alimentarios indígenas amazónicos se sustentan en una noción del cuerpo y lo nutricio diferente a la considerada por la OMS, a su vez anclada a una ontología en la que humanos y no humanos son agentes en el sistema de manejo de la biodiversidad, el territorio y el ambiente. Lo anterior es fundamental toda vez que el cuerpo humano es entendido como el producto de los conocimientos culturales adquiridos con el tiempo y compartidos por el grupo de parentesco o grupo étnico, lo cual está estrechamente ligado a un sistema de restricciones alimentarias periódicas y de transformación ritual física de los sujetos.

Los conocimientos sobre el alimento y la nutrición no son separables de los conocimientos asociados a la relación con la naturaleza, por ende la “creación de capacidades” sobre el tema no es pertinente y por el contrario riesgosa, en tanto los pueblos amazónicos cuentan con el conocimiento necesario para promover la producción y reproducción de sus colectivos sociales y culturales. De manera que introducir conocimientos otros es un sesgo cultural y puede resultar nocivo, a la vez que desconoce otras epistemologías. No obstante, sería útil pensar dicha creación de capacidades a nivel institucional y sectorial, sensibilizando a las entidades del Estado y al sector privado acerca de la importancia de los sistemas alimentarios indígenas y de las amenazas que estos enfrentan por la ausencia de políticas diferenciadas. En suma, es necesario considerar la salvaguardia de los conocimientos tradicionales asociados a los sistemas alimentarios indígenas y sus mecanismos de trasmisión como principio rector para promover sistemas alimentarios sostenibles, esto implica des-centrar nociones occidentales y modernas sobre el cuerpo, la salud, la enfermedad y la nutrición.

**3. Considerando los ámbitos normativos identificados en el capítulo 3 y los factores propicios sugeridos en el párrafo 41 del borrador cero, ¿cuáles son los primeros pasos normativos que deberían analizarse en el capítulo 3, teniendo en cuenta la necesidad de fomentar la coherencia de las políticas y abordar su fragmentación?**

Teniendo en cuenta que el objetivo último de estas directrices es generar ciertos pasos normativos para orientar reformas políticas e institucionales, con el fin de propiciar sistemas alimentarios sostenibles que mejoren la nutrición y permitan introducir dietas saludables, y considerando que los ámbitos normativos relacionados con el tema son del plano internacional, regional, nacional y subnacional, sugerimos lo siguiente:

* Considerar un enfoque sistémico, multi-actor y multiescalar que tenga como base acuerdos voluntarios de conservación y ordenamiento territorial de base local y se desarrolle progresivamente, desde un enfoque bottom-up, hacia un ámbito regional, nacional y supranacional.
* Considerar aspectos formales e informales de las políticas, inversiones y mecanismos institucionales, generando acciones afirmativas -conducentes a salvaguardar los sistemas alimentarios tradicionales- a diferente escala. Esto significa trascender el ámbito de lo puramente legal, y abordar lo cultural y socialmente legítimo, indagando por metodologías de construcción participativas como la memoria social, la investigación endógena y la elaboración de sistemas propios de seguimiento y monitoreo.
* Considerar en la planificación, diseño, implementación, seguimiento y evaluación de las diferentes políticas y mecanismos institucionales una perspectiva de género situado culturalmente (acorde a las particularidades de las relaciones y categorías de género propias) que dé directrices claras y concretas para articular los intereses de las mujeres de base local, detentoras y transmisoras del conocimiento complejo sobre los Sistemas Alimentarios Indígenas.
* Reconocer los procesos territoriales propios y autónomos en materia de conservación y ordenamiento territorial.

Con base en las anteriores recomendaciones generales vislumbramos los siguientes pasos normativos (especialmente concebidos para los sistemas alimentarios indígenas):

1. Caracterización participativa de los territorios y las territorialidades en tanto escenarios de implementación de futuras políticas, teniendo en cuenta que los mismos son susceptibles de trascender los límites político-administrativos nacionales y subnacionales. Esto incluye una definición de escala, identificación de presiones y amenazas, y caracterización de redes y actores (y agentes que, como los comerciantes, no inciden directamente en la formulación de políticas pero sí en las decisiones de los alimentos que se ofertan en un territorio) completa y etnológica basada en la investigación colaborativa e intercultural.

2. Caracterización del tipo de gobernanza que predomina en el territorio donde se implementará la estrategia de conservación y salvaguardia de Sistemas Alimentarios Indígenas (si es pública, privada, comunitaria, o compartida), con el fin de involucrar, de ser pertinente y necesario, otros actores y acuerdos que puedan aportar a su sostenibilidad.

3. Identificación de estrategias situadas de salvaguardia y conservación de los sistemas alimentarios indígenas en tanto sistemas de uso de la biodiversidad. Lo anterior acorde al contexto biocultural, y teniendo en cuenta tanto la base normativa nacional como los pasos normativos 1 y 2 señalados arriba. Esto implica considerar estrategias de conservación complementarias a las puramente ambientales (como los sistemas de parques nacionales) o las eminentemente culturales, entendiendo las estrategias complementarias de conservación en tanto arreglos institucionales fundamentados en acuerdos sociales (Matallana et al., 2019: 26), donde la gente hace parte integral de los procesos.

4. Implementación basada en articulación entre instrumentos de planeación, gestión y manejo territorial y ambiental locales comunitarios e instrumentos de planeación, gestión y manejo territorial y ambiental tanto de entidades territoriales vecinas como de entidades e instituciones subnacionales, nacionales y supranacionales. Esta implementación debe considerar la articulación con las políticas organizativas de las mujeres, de existir una organización de mujeres, o los intereses y necesidades de ellas, de no haber una estructura organizativa formal.

5. Favorecer la integración y la cooperación regional para la salvaguardia de sistemas alimentarios.

**4. ¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?**

Es pertinente considerar, en el marco de los sistemas alimentarios indígenas y en complemento a lo ya señalado en el reporte del Seminario de Expertos de Alto Nivel sobre Sistemas Alimentarios Indígenas 2018, la formulación de políticas y programas relativos a los siguientes aspectos:

* Salvaguardia de los sistemas de conocimiento tradicional, lo cual incluye el fortalecimiento de la transmisión intergeneracional de conocimiento. Al respecto, esto complementa el punto 55-c relativo a la educación nutricional, revalorizando en los espacios educativos los conocimientos tradicionales relativos al cultivo de alimentos propios y pautas culturales de cultivo.
* Ejercicio real y efectivo de los derechos territoriales de los pueblos indígenas y reconocimiento de sus sistemas propios de ordenamiento territorial y ambiental.
* Fortalecimiento de la economía local y regional, promoviendo el intercambio y mercado justo de alimentos producidos en entornos vecinos.
* Complementando el punto 46-b relativo al suministro de alimentos nutritivos, incentivar la compra, por parte de los comerciantes que inciden en los entornos alimentarios, de productos locales, esto en el marco del comercio justo. A su vez, y al ser estos comerciantes agentes decisorios respecto a la gama de alimentos que ofertan en centros poblados conexos a territorios indígenas, crear en dichos comerciantes capacidades que tengan en cuenta mínimos nutricionales.
* Apoyo a iniciativas que permitan a las comunidades reemplazar alimentos introducidos de afuera, y cuyo aporte no es significativo en términos de nutrientes, por alimentos producidos localmente (p.e. producción propia de miel en lugar de azúcar).
* Promoción de comidas escolares propias del entorno cultural. Esto implica la certificación de productos provenientes de los sistemas tradicionales de cultivo para su consumo en instituciones públicas en Territorios Indígenas.
* Registro y protección de los sistemas alimentarios indígenas en sus componentes material e inmaterial.
* Formulación de planes de estudio de educación intercultural con componentes basados en los sistemas alimentarios indígenas.
* Construcción de estrategias agro-ecológicas complementarias para comunidades sedentarizadas con población creciente, y para sistemas de cultivo que sufren el impacto del cambio climático. - Promoción de sistemas indígenas de monitoreo y seguimiento ambiental y su articulación con sistemas multinivel y multitemporales.
* Protección de territorios donde existen sistemas alimentarios indígenas en estado de riesgo crítico (por medio del otorgamiento de derechos de propiedad colectiva sobre la tierra, p.e.).
* Reconocimiento real y efectivo del derecho al consentimiento previo, libre e informado sobre políticas y programas que afectan territorios y sistemas alimentarios indígenas.
* Viabilización de cadenas de producción y valor con enfoque diferenciado. En el marco de estas, los costos de certificación deberían tener en cuenta los beneficios ambientales y sociales de la producción sostenible.

Por su parte, y entre los desafíos que implica considerar los sistemas alimentarios desde un enfoque holístico, diferencial y situado, se listan entre otros los siguientes:

* Trascender un abordaje centrado en el concepto de seguridad alimentaria y abordar el tema desde la autonomía alimentaria, entendida como el “[...] derecho que le asiste a cada comunidad, pueblo o colectivo humano, integrante de una nación, a controlar autónomamente su propio proceso alimentario según sus tradiciones, usos, costumbres, necesidades y perspectivas estratégicas, y en armonía con los demás grupos humanos, el medio ambiente y las generaciones venideras” (Morales González, 2009). Esto lleva a reconocer que la nutrición implica a su vez decisiones de los sujetos en cuanto actores -y no agentes pasivos- de su propio bienestar.
* Contemplar un enfoque diferencial y situado a la hora de caracterizar la población de bajos ingresos. En el caso de los pueblos indígenas, los ingresos no son un indicador pertinente de desnutrición. El hecho de que no tengan ingresos constantes no significa, per se, el que no tengan acceso a alimentos nutritivos. En el caso de los pueblos indígenas del nororiente amazónico colombiano, por ejemplo, la pobreza no refiere a la ausencia de dinero para comprar alimentos, sino a la falta de un espacio propicio de cultivo. Esto lleva a considerar, no medidas asistencialistas, sino de fortalecimiento de los sistemas ancestrales de cultivo, cuya eficacia en el caso amazónico es demostrada por los altos índices de conservación de un territorio que es frágil en términos de fertilidad del suelo.
* Considerar los impactos generados, en los pueblos indígenas, por los productos que vienen de afuera, los cuales evidencian una problemática relevante: la de las basuras como consecuencia de la introducción de un pensamiento de orden económico que induce a nuevas formas de consumo, incrementando la dependencia a productos externos, y la consecuente acumulación de empaques plásticos y residuos en territorios que no tienen la capacidad de tratarlos. Lo anterior termina por afectar los suelos y fuentes hídricas de las que dependen los sistemas alimentarios indígenas (ACIMA y Gaia, 2019: 192).
* Relacionado con lo anterior, el punto 53-b, relativo a las mejoras de la calidad de los alimentos, se queda corto al no considerar la calidad de los suelos y salud de los ecosistemas como algo que influye directamente en lo primero. Esto ocurre al desconectar el alimento de la tierra que lo produce. Hablar de sistemas alimentarios implica, en ese sentido, considerar la nutrición desde los suelos, lo cual implica, a su vez, un enfoque agro-ecológico de relación multiespecie, sistemas rotativos, modelos sostenibles de ocupación del territorio, ciclos adaptados a las condiciones locales, y relaciones justas.

Por su parte, el sistema alimentario “ideal” es aquel que considera toda la cadena de producción del alimento, no sólo la relativa a su comercialización. En ese sentido, la formulación de políticas debe estar orientada a la protección, preservación y salvaguardia del entorno en el que se generan y se mantienen los sistemas alimentarios indígenas.

Por último, valdría la pena mencionar que un gran limitante a la hora de salvaguadar los Sistemas Alimentarios Indígenas y sus conocimientos asociados son las relaciones de mercado imperantes y la globalización de la industria alimentaria que, acompañada de una falta de regulación fiscal y enmarcada en la celebración de tratados de libre comercio desventajosos para los países “en desarrollo” -muchos de ellos parte del grupo de países Megadiversos en términos biológicos y de mayor diversidad lingüística-, sobrepone intereses económicos a preocupaciones éticas. Las economías extractivas y la acumulación por desposesión representan también un grave riesgo para estos sistemas alimentarios indígenas.

**5. ¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?**

En el caso de los sistemas alimentarios indígenas, las Directrices voluntarias podrían ser más útiles al promover y esclarecer caminos que permitan establecer, a nivel nacional, sistemas de certificación diferenciada ancladas a cadenas de producción y valor justas y sostenibles. En cuanto al nivel regional, el marco de estas Directrices voluntarias debe adecuarse a las aspiraciones, necesidades y expectativas de las comunidades locales, respetándose los derechos adquiridos por éstas en virtud de la legislación nacional e internacional.

## Candida Dereck, Sobre la Alianza Mesoamericana de Pueblos y Bosques, Honduras

Buenas desde Honduras del pueblo indígena Miskitu le envió un saludo a la distancia, y mi contribución a la presente plantilla.

Candida Dereck

Comisión de Genero de las Mujeres Territoriales de la AMPB

**1. ¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030? ¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?**

Sim refleja adecuadamente, otras causas de la malnutrición que afecta a la salud de la población indígena y general; desnutrición en embarazadas, tercera edad y adolescentes que conlleva a anemia crónico. También causa enfermedades Crónicos como la Diabetes Miletes, hipertensión arterial, enfermedades de la piel, enfermedades cardiológicas, diarreas, parasitismo intestinal y artritis. Los efectos que deja a la población indígena, son problemas sociales, familiares, educativo y mortalidad por estos casos, los más vulnerables y afectados son las mujeres y niños, por el difícil acceso geográfico de asistir a centro de asistencia médica, por lo tanto acude a la medicina tradicional, que en estos casos no ayuda mucho, por cultura cuando esta con tratamiento en base a medicina tradicional le pruebe consumir algunos tipos de alimentos y esto conlleva aún más a la desnutrición.

Los problemas subyacentes: la falta de necesidades básicas en toda población indígena, extrema pobreza, falta de fuente de empleo, no hay mucho interés de parte de los gobiernos nacionales y central, la perdida de cultura, costumbres, tradiciones indígena, la optación de malos hábitos alimentarios perdiendo la comida tradicional, optan mucha comida occidental, el cambio climática afecta los suelos y pérdida de cosechas, mal uso de los recursos naturales y explotación, descombros, deforestación de parte de los terceros, (los colones que invade a los territorios indígenas) las ayudas no llega a los pueblos indígenas según asignado(mal manejo de los fondos indígenas). No hay proyectos de desarrollo económico, limitantes proyectos agrícolas y ganaderas, no hay seguimiento ni fortalecimiento de los proyectos. No hay proyecto de empoderamiento económico, ni de sostenibilidad.

**2. ¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?**

Principios Rectores: todas son relevantes pero también analizar los siguientes: Realizar trabajo con los líderes de cada pueblo indígena, Rescate o Fortalecimiento de la tradición, costumbres y cultura, saneamiento de los terceros para rescatar los recursos naturales y el suelo, monitorizar y vigilar con el cumplimiento y asignación de los fondos asignados a los pueblos indígenas para combatir el hambre, crear fuentes de empleo de porte de organización gubernamental y no gubernamental para que tenga ingreso económico, crear empleos o proyectos dirigidas a la mujeres con empoderamiento económico y sostenibilidad, crear plan estratégico para reforestación, conservación y uso correcto de los recursos naturales y el uso correcto del suelo, atreves de la educación promover la importancia del consumo de la comida tradicional y el uso de vegetales, promover a la población indígena la agricultura y ganadería y considerar como proveedores menor y menor en caso de comercialización, consumir lo que en el pueblo cosecha. Crear salud indígena y educación indígena basada en la alimentación, gobernanza territorial, equidad de género en acceso a las tierras economía, social y recursos naturales, Sistemas alimentarios tradicionales.

Los principios son aceptables ya que son muy relevantes y concuerda con la situación actual de la malnutrición de los pueblos Indígenas.

Todos son apropiados para los pueblos indígenas pero los más relevantes que apega a la situación actual de los pueblos son las siguientes: Promover políticas destinadas a mejorar los medios de vida, la salud y el bienestar de la población y a potenciar la sostenibilidad de la producción y el consumo de alimentos, así como la protección de la biodiversidad y los ecosistemas, promover la equidad de género, Reforzar la educación nutricional en los planos individual y comunitario, mejorar la accesibilidad de los pueblos indígenas a los servicios de salud, educación.

**3. Considerando los ámbitos normativos identificados en el capítulo 3 y los factores propicios sugeridos en el párrafo 41 del borrador cero, ¿cuáles son los primeros pasos normativos que deberían analizarse en el capítulo 3, teniendo en cuenta la necesidad de fomentar la coherencia de las políticas y abordar su fragmentación?**

Los primeros pasos normativos; gobernanza transparente y responsable de los sistemas alimentarios, igualdad de género y empoderamiento de la mujer, educación nutricional, inocuidad de los alimentos, pérdidas y desperdicio. Se necesitan nuevas políticas a fin de abordar la fragmentación normativa y diseñar intervenciones que deben coordinarse entre distintos sectores, como la salud, la agricultura y los sistemas alimentarios, la educación, el agua y el saneamiento, el género, la protección social, el comercio, el empleo y los ingresos, sectores todos ellos que abordan las múltiples causas de la malnutrición. Las políticas de adaptación al cambio climático y la mitigación, Los modelos agrícolas basado en tradición y costumbres indígena.

**4. ¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?**

El sistema alimentario lo ideal sería; Hacer un trabajo en equipo con las mujeres sobre la alimentación de la familia(la mujer es la juega el roll más importante dentro de la familia y el hogar con la alimentario diario, la siembra la cosecha, la conservación de la alimentación, el precio de la canasta básico y otros).

Rescatar la cultura los costumbres y la tradición alimentarios de los pueblos indígenas, rescatar, reforzar, fortalecer los modelos tradicional de la agriculturas, consumir la producción y las cosechas de la población indígenas, respeto al derecho indígena, al reconocimiento y protección de los valores prácticas, culturales de la población indígena por las organizaciones gubernamentales y no gubernamentales, la consulta libre previa informado sobre la nutrición/ alimentación, deberá respetar las OG Y ONG los costumbres y métodos tradicionales alimentarias de los pueblos indígenas. Promover la educación alimentaria tradicional.

El objetivo primordial es trabajar con los líderes de los pueblos indígenas especialmente con las mujeres sobre el tema de la alimentación. Los indicadores que debería de utilizar son a través de un análisis de la situación real de los pueblos para lograr datos relevantes de cada pueblo, la alimentación tradicional y lo que más se consume actualmente, a que se debió el cambio de hábitos alimenticios, la economía, lo que afecta los cambios climáticos, los efectos que hace los colonos/ los terceros, la extrema pobreza en que vive la población indígena.

**5. ¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?**

Socializar en todas las instancias indígenas, gubernamentales, no gubernamentales, donantes, interesados.

Gestionar proyectos alimentarios dirigidos a los pueblos indígenas y ejecutar.

Coordinar, gestionar, monitorizar, supervisar, ejecutar, dirigir, todas las directrices debe llevar a cabo en equipo logrando el mayor participación los pueblos indígenas con transparencia en toda las instancias.

Una vez aprobada hay que accionar de inmediato cumpliendo con los indicadores y dar un buen seguimiento para el cumplimiento. Que no queda plasmado y archivado como otros estudios.

## Peter Jackson, WorldFish, Cambodia

Thanks for the opportunity to contribute. in the attached, I've added brief suggestions about the value of:

* highlighting information (including specific statistics) about links between nutrition and economic productivity
* highlighting the role of (shifting) seasonality in food systems
* highlighting the importance of fisheries and aquaculture, including in specific areas (climate change, school feeding): “Fish is a vital source of nutrition and feeds more than 1 billion consumers to whom ﬁsh is a key component of their diets.” (World Bank, FAO, WorldFish, ARD. 2012: xviii)
* including a sub-section on water security for food systems. This could highlight the recommendations on Water for Food Security and Nutrition which were endorsed by the CFS.

**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?**

In terms of securing national governments’ political will to continue and expand their support for improved nutrition, it’s important to show links to economic productivity and opportunities. The text in paragraph 5 is useful in this regard. It may be useful to footnote a specific study which quantifies economic losses due to malnutrition (e.g. in Cambodia, one paper notes 266 million USD annually, 1.7% of GDP[[1]](#footnote-1))

**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?**

No comments on this section

**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?**

It may be helpful to acknowledge the critical role of seasonality in food systems – 1) (shifting) seasonality restricting the availability of specific foods at specific times, and 2) the importance of policy and production initiatives to increase the seasonal availability of nutrient-rich foods.

The importance of fisheries and aquaculture for food systems and nutrition could be more explicitly highlighted. Currently, fisheries and aquaculture are incorporated into agriculture (footnote 23). It could be argued that this has the effect of under-representing fisheries and aquaculture and privileging land-based food systems. Fish is very significant for global food systems, and for food and nutrition security: “Fish is a vital source of nutrition and feeds more than 1 billion consumers to whom ﬁsh is a key component of their diets.” (World Bank, FAO, WorldFish, ARD. 2012. Hidden Harvest: The Global Contribution of Capture Fisheries. Pg. xviii. Available from: http://documents.worldbank.org/curated/en/515701468152718292  
/pdf/664690ESW0P1210120HiddenHarvest0web.pdf).

Some specific suggestions (below) for explicitly mentioning fisheries and aquaculture in the main text of chapter 3 Chapter 3, Part 1:

(Pg 10-11) d) Sustainable use of forest, wildlife, aquatic resources

Promoting the sustainable use of forest, wildlife and aquatic resources, as part of the local agrobiodiversity, is of high importance as they offer important sources of complementary food and income. However, there are a number of challenges that include: inadequate resource governance, overharvesting and land clearing for agriculture, difficulties in securing access to natural resources including land, loss of traditional knowledge, and weak integration in market economies.

In Cambodia, there is high availability and high per capita consumption of fish. In addition, nationally, school feeding is shifting to a ‘home-grown’ model. It may be helpful to specify ‘fisheries’ for school feeding.

(Pg 11): f) Linking farms and fisheries to school

Linking farms and fisheries to school can improve the supply of nutritious foods to schools while creating opportunities for stable and predictable markets for local farmers.  This type of initiatives foster the integration of local farmers and fishers into school food supply chains. Food safety must be secured by applying hygienic practices in the processing and packaging of foods. […]

Climate change affects fisheries, and this could be explicitly noted:

(Pg 11): Climate change adaptation and mitigation

The world is experiencing climate change and variability, shifting seasons and increased severity and frequency of natural disasters with great impact on the agricultural output of low-resource regions, soil fertility, crop yields, ~~and~~ forest and animal productivity and fisheries. These trends may result in lower incomes, reduced climate resilience and decreased access to adequate supply of nutrient-dense foods. […]

In addition, given the cross-cutting importance of water for food systems (agriculture, fisheries and forestry), and future challenges related to water, it may be useful to have a separate sub-section on water security under Production systems > Policy-relevant areas. The recommendations on Water for Food Security and Nutrition, endorsed by the CFS, could be used to inform this sub-section.

**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 policy-making?**

No comments on this.

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

No comments on this.

## Francisco von Hildebrand, Fundación Gaia Amazonas, Colombia

Dando respuesta la convocatoria en la que se nos invita a participar en la consulta en línea para finalizar las Directrices Voluntarias sobre Sistemas Alimentarios y Nutrición, adjunto el documento con las contribuciones generadas por nuestro equipo. En copia Juliana Sánchez, asesora que va estar a cargo de la comunicación relacionada con este tema.

Agradecemos el habernos tenido en cuenta y quedamos atentos,

Francisco von Hildebrand

Director Ejecutivo

**1. ¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030? ¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?**

Los aportes a continuación están relacionados con los sistemas alimentarios indígenas amazónicos, en la medida en que, como lo señala el Equipo de Pueblos Indígenas de la FAO, hasta el momento las directrices voluntarias sobre los sistemas alimentarios y la nutrición son muy detalladas sobre su dimensión comercial, pero no atienden las particularidades de los sistemas alimentarios indígenas y los conocimientos tradicionales sobre los que estos se sustentan, los cuales presentan, como dicho equipo subraya, “importantes contribuciones conceptuales que no se han incluido en este borrador”, y que han demostrado, en una realidad evidente de cambio climático, “ser sostenibles, resistentes y adaptables”.

Entre estas contribuciones conceptuales, y con el ánimo de complementar las enunciadas en los comentarios del Equipo de Pueblos Indígenas de la FAO desde nuestra experiencia en el acompañamiento a las poblaciones indígenas en el nororiente amazónico, destacamos las siguientes:

* Los sistemas alimentarios indígenas se enmarcan en un sistema más amplio de manejo territorial del cual depende el balance ecológico.
* Las actividades asociadas al alimento no son solo técnicas que conducen a resolver necesidades materiales, sino que son un entramado de prácticas, saberes y comportamientos en las que se repiten interacciones con seres no humanos (plantas, animales y minerales) y otras entidades (dueños espirituales de los elementos de la naturaleza), integrando conocimientos, saberes y prácticas que son propios de mujeres y hombres, de manera complementaria e interdependiente.
* Los sistemas alimentarios indígenas amazónicos se fundamentan en la relación interdependiente entre la memoria, la producción y la nutrición. La memoria conecta al sujeto con el colectivo del que hace parte, en cuanto es la herencia de ese entramado de conocimientos, saberes y prácticas asociados a la recolección, caza y pesca y a la producción del alimento cultivado (desde la selección del suelo, a la identificación de las semillas, siembra, manejo de la cosecha, y transformación de los alimentos). Esa memoria se mantiene en el hacer del día a día, y en el retorno constante a las historias de origen, de donde surgen las pautas para el manejo de dicho sistema. Esto es memoria en palabra, relato y acción. Esta memoria está también relacionada con el sistema de parentesco y la organización social de los pueblos indígenas en el caso amazónico, donde el conocimiento chamánico para el manejo del mundo se hereda por vía paterna, y las semillas y manejo de las mismas se heredan por vía materna.
* La producción del alimento es vista como una relación de filiación con la tierra cultivada, de alianza entre el cazador y su presa, y de reproducción de unas pautas de manejo y de un sistema de vida (Descola, 2012).

En esa medida, el Informe del Grupo de Alto Nivel de Expertos en Seguridad Alimentaria y Nutrición se fundamenta en un marco conceptual que no es suficiente a la hora de caracterizar los sistemas alimentarios existentes en el mundo. La tipología que propone el GANESAN (sistemas alimentarios tradicionales, sistemas alimentarios mixtos y sistemas alimentarios modernos) describe fenómenos sociales limitados, y existentes únicamente en culturas modernas y occidentales, donde la naturaleza es entendida como un medio (un objeto-recurso susceptible de ser explotada) y las colectividades humanas en tanto sujetos que se apropian de ella para vivir. Tal como se señala en los comentarios del Equipo de Pueblos Indígenas de la FAO, esta tipología contempla sistemas antropocéntricos, y deja por fuera un abanico enorme de maneras de relacionarse con el ambiente y concebir el alimento y la nutrición.

En coherencia con lo anterior, el capítulo 1 de las Directrices Voluntarias sobre los Sistemas Alimentarios y la Nutrición no refleja la situación actual de malnutrición y las causas y efectos relacionados. Es importante entender que la definición de “nutricio” no es un universal, ni la biomedicina es el único conocimiento legítimo a la hora de catalogar una dieta como saludable o no. De manera análoga existen diferentes nociones sobre la salud y la enfermedad, sustentadas en diversas maneras de concebir el cuerpo y la naturaleza. Estas nociones se enmarcan, a su vez, en una concepción holística de manejo territorial, abarcando la integralidad de las interrelaciones (ecosistémicas, sociales y de orden espiritual) en pro del bienestar de la gente y su entorno.

Asimismo, los indicadores y métricas empleados para medir la malnutrición, desnutrición y carencia de micronutrientes pertenecen a una epistemología particular, la moderna occidental, y por ende resultan hegemónicos y poco descriptivos al ser usados para comprender sistemas alimentarios indígenas, y coloniales a la hora de emplearse en la formulación de estrategias de intervención en contextos socioculturales diferenciados. De igual manera, es necesario formular políticas que contribuyan a dejar de construir periferias en contraposición a centros de conocimiento y poder; un buen paso al respecto sería dejar de asociar “tradicional” con “precario”, pues los sistemas alimentarios indígenas no son sistemas de subsistencia, todo lo contrario, se caracterizan por su diversidad, variedad y abundancia.

Al formular marcos conceptuales diferenciados e incluyentes es posible que las políticas derivadas sean menos asistenciales y más interculturales e inter-epistémicas, menos deterministas y más holísticas, contemplando la necesidad y pertinencia de defender los derechos territoriales de las colectividades indígenas, promoviendo una participación política efectiva de estos grupos, y favoreciendo esquemas de gobernanza no hegemónica que los incluyan de manera real. Lo anterior entendiendo que el tema de la alimentación está atravesado por la cultura, los sistemas de producción, la distribución de la tierra y, debe agregarse, la legitimación de ciertas formas de entender y estar en el mundo por sobre otras posibles. Más que diseñar intervenciones que coordinen diferentes sectores, se deben favorecer acciones que den lugar a las diferentes agencias de los pueblos indígenas, trascendiendo la retórica del re-conocimiento y el multiculturalismo (reconociendo derechos a la vez que se imponen límites para su ejercicio efectivo) (Bonilla, 2006; Abello, 2012: 114; Lopera y Dover, 2013: 82; Hale, 2005: 14), y abogando por generar las condiciones para que sus epistemologías y lógicas de acción sean realmente consideradas en la formulación de políticas a diferentes escalas. En lo que respecta a los objetivos y metas de la Agenda 2030, estos son de difícil cumplimiento en la medida en que no se garanticen mecanismos de salvaguardia de los sistemas alimentarios indígenas en tanto sistemas de uso de la biodiversidad, y de sus conocimientos asociados como patrimonio inmaterial de la humanidad. Al respecto, deben llevarse a cabo acciones afirmativas que garanticen la soberanía y autonomía alimentaria de los pueblos indígenas, en el marco de un respeto a su derecho a la autodeterminación y por encima de un enfoque que promueva la sola seguridad alimentaria (entendida en términos de acceso a los alimentos sin cuestionar su procedencia). Estrategias que promuevan el intercambio y recuperación de semillas y conocimientos de manejo ambiental deben primar por sobre estrategias que dependen de la articulación de las colectividades indígenas con el capitalismo, incluso si este es un capitalismo proteccionista y de Estado. La razón de esto es muy sencilla: en el momento en que la naturaleza se concibe como valor de cambio y se mercantiliza, la relación que establece cualquier grupo social con ella deja de ser biocéntrica y empieza a ser antropocéntrica, por lo tanto el sistema alimentario indígena se ve en enorme riesgo.

Los sistemas alimentarios no indígenas han fracasado a la hora de proporcionar dietas saludables porque no sostienen una relación con la naturaleza que se base en los principios de reciprocidad y equilibrio, frente a lo cual los sistemas alimentarios indígenas tienen mucha más claridad al respecto. En la misma línea la combinación de diferentes formas de consecución del alimento (por ejemplo la cacería, pesca, recolección y horticultura en el caso amazónico) y la diversificación de medios y técnicas redunda en la generación de intercambios ecológicos con la naturaleza que respetan los ciclos bio-geo-químicos de la misma. Desde esta perspectiva, los sistemas de conocimiento indígena son mucho más ricos y detallados en su lectura de las relaciones entre los diferentes seres vivos, y es sobre esta lectura que accionan, tanto a un nivel espiritual (que da cuenta del lazo místico y vital que une al hombre con la tierra de la cual depende su supervivencia) como a un nivel material.

El principal rasgo de los sistemas alimentarios indígenas es su heterogeneidad y su complejidad sistémica, pues ésta abarca prácticas forestales como las nombradas arriba, de tal forma que la unidad doméstica familiar indígena (sea la familia extensa como en el caso amazónico, o unifamiliar como en otros casos) cuenta con todo lo necesario -habitación, infraestructura, utensilios, alimento, salud, entre otros- para vivir gracias a su trabajo y a la reciprocidad que mantiene con la naturaleza. En este sentido la selva, en tanto paisaje antropogénico, se debe entender como un sistema integrado que, lejos de poder conservarse prístino e intocable, depende de la interacción del ser humano con su entorno como uno entre otros agentes parte.

**2. ¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?**

Los principios rectores propuestos en el capítulo 2, a saber: a) enfoque sistémico, integral y basado en hechos comprobados; b) políticas coherentes y específicas de cada contexto; c) personas sanas en un planeta sano; d) igualdad de género y empoderamiento de la mujer; y f) realización del derecho a la alimentación, son todos ellos pertinentes y adecuados al contexto nacional colombiano y al contexto local del noroeste de la pan-amazonía (zona donde la Fundación Gaia ha adelantado su trabajo de acompañamiento a gobiernos indígenas).

Sin embargo, los principios e) conocimientos y sensibilización sobre nutrición, y g) creación de capacidad, tal y como están descritos, no parecieran adecuados en términos culturales, ya que los sistemas alimentarios indígenas amazónicos se sustentan en una noción del cuerpo y lo nutricio diferente a la considerada por la OMS, a su vez anclada a una ontología en la que humanos y no humanos son agentes en el sistema de manejo de la biodiversidad, el territorio y el ambiente. Lo anterior es fundamental toda vez que el cuerpo humano es entendido como el producto de los conocimientos culturales adquiridos con el tiempo y compartidos por el grupo de parentesco o grupo étnico, lo cual está estrechamente ligado a un sistema de restricciones alimentarias periódicas y de transformación ritual física de los sujetos.

Los conocimientos sobre el alimento y la nutrición no son separables de los conocimientos asociados a la relación con la naturaleza, por ende la “creación de capacidades” sobre el tema no es pertinente y por el contrario riesgosa, en tanto los pueblos amazónicos cuentan con el conocimiento necesario para promover la producción y reproducción de sus colectivos sociales y culturales. De manera que introducir conocimientos otros es un sesgo cultural y puede resultar nocivo, a la vez que desconoce otras epistemologías. No obstante, sería útil pensar dicha creación de capacidades a nivel institucional y sectorial, sensibilizando a las entidades del Estado y al sector privado acerca de la importancia de los sistemas alimentarios indígenas y de las amenazas que estos enfrentan por la ausencia de políticas diferenciadas. En suma, es necesario considerar la salvaguardia de los conocimientos tradicionales asociados a los sistemas alimentarios indígenas y sus mecanismos de trasmisión como principio rector para promover sistemas alimentarios sostenibles, esto implica des-centrar nociones occidentales y modernas sobre el cuerpo, la salud, la enfermedad y la nutrición.

**3. Considerando los ámbitos normativos identificados en el capítulo 3 y los factores propicios sugeridos en el párrafo 41 del borrador cero, ¿cuáles son los primeros pasos normativos que deberían analizarse en el capítulo 3, teniendo en cuenta la necesidad de fomentar la coherencia de las políticas y abordar su fragmentación?**

Teniendo en cuenta que el objetivo último de estas directrices es generar ciertos pasos normativos para orientar reformas políticas e institucionales, con el fin de propiciar sistemas alimentarios sostenibles que mejoren la nutrición y permitan introducir dietas saludables, y considerando que los ámbitos normativos relacionados con el tema son del plano internacional, regional, nacional y subnacional, sugerimos lo siguiente:

* Considerar un enfoque sistémico, multi-actor y multiescalar que tenga como base acuerdos voluntarios de conservación y ordenamiento territorial de base local y se desarrolle progresivamente, desde un enfoque bottom-up, hacia un ámbito regional, nacional y supranacional.
* Considerar aspectos formales e informales de las políticas, inversiones y mecanismos institucionales, generando acciones afirmativas -conducentes a salvaguardar los sistemas alimentarios tradicionales- a diferente escala. Esto significa trascender el ámbito de lo puramente legal, y abordar lo cultural y socialmente legítimo, indagando por metodologías de construcción participativas como la memoria social, la investigación endógena y la elaboración de sistemas propios de seguimiento y monitoreo.
* Considerar en la planificación, diseño, implementación, seguimiento y evaluación de las diferentes políticas y mecanismos institucionales una perspectiva de género situado culturalmente (acorde a las particularidades de las relaciones y categorías de género propias) que dé directrices claras y concretas para articular los intereses de las mujeres de base local, detentoras y transmisoras del conocimiento complejo sobre los Sistemas Alimentarios Indígenas.
* Reconocer los procesos territoriales propios y autónomos en materia de conservación y ordenamiento territorial. Con base en las anteriores recomendaciones generales vislumbramos los siguientes pasos normativos (especialmente concebidos para los sistemas alimentarios indígenas):

1. Caracterización participativa de los territorios y las territorialidades en tanto escenarios de implementación de futuras políticas, teniendo en cuenta que los mismos son susceptibles de trascender los límites político-administrativos nacionales y subnacionales. Esto incluye una definición de escala, identificación de presiones y amenazas, y caracterización de redes y actores (y agentes que, como los comerciantes, no inciden directamente en la formulación de políticas pero sí en las decisiones de los alimentos que se ofertan en un territorio) completa y etnológica basada en la investigación colaborativa e intercultural.
2. Caracterización del tipo de gobernanza que predomina en el territorio donde se implementará la estrategia de conservación y salvaguardia de Sistemas Alimentarios Indígenas (si es pública, privada, comunitaria, o compartida), con el fin de involucrar, de ser pertinente y necesario, otros actores y acuerdos que puedan aportar a su sostenibilidad.
3. Identificación de estrategias situadas de salvaguardia y conservación de los sistemas alimentarios indígenas en tanto sistemas de uso de la biodiversidad. Lo anterior acorde al contexto biocultural, y teniendo en cuenta tanto la base normativa nacional como los pasos normativos 1 y 2 señalados arriba. Esto implica considerar estrategias de conservación complementarias a las puramente ambientales (como los sistemas de parques nacionales) o las eminentemente culturales, entendiendo las estrategias complementarias de conservación en tanto arreglos institucionales fundamentados en acuerdos sociales (Matallana et al., 2019: 26), donde la gente hace parte integral de los procesos.
4. Implementación basada en articulación entre instrumentos de planeación, gestión y manejo territorial y ambiental locales comunitarios e instrumentos de planeación, gestión y manejo territorial y ambiental tanto de entidades territoriales vecinas como de entidades e instituciones subnacionales, nacionales y supranacionales. Esta implementación debe considerar la articulación con las políticas organizativas de las mujeres, de existir una organización de mujeres, o los intereses y necesidades de ellas, de no haber una estructura organizativa formal.
5. Favorecer la integración y la cooperación regional para la salvaguardia de sistemas alimentarios.

**4. ¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?**

Es pertinente considerar, en el marco de los sistemas alimentarios indígenas y en complemento a lo ya señalado en el reporte del Seminario de Expertos de Alto Nivel sobre Sistemas Alimentarios Indígenas 2018, la formulación de políticas y programas relativos a los siguientes aspectos:

* Salvaguardia de los sistemas de conocimiento tradicional, lo cual incluye el fortalecimiento de la transmisión intergeneracional de conocimiento. Al respecto, esto complementa el punto 55-c relativo a la educación nutricional, revalorizando en los espacios educativos los conocimientos tradicionales relativos al cultivo de alimentos propios y pautas culturales de cultivo.
* Ejercicio real y efectivo de los derechos territoriales de los pueblos indígenas y reconocimiento de sus sistemas propios de ordenamiento territorial y ambiental.
* Fortalecimiento de la economía local y regional, promoviendo el intercambio y mercado justo de alimentos producidos en entornos vecinos.
* Complementando el punto 46-b relativo al suministro de alimentos nutritivos, incentivar la compra, por parte de los comerciantes que inciden en los entornos alimentarios, de productos locales, esto en el marco del comercio justo. A su vez, y al ser estos comerciantes agentes decisorios respecto a la gama de alimentos que ofertan en centros poblados conexos a territorios indígenas, crear en dichos comerciantes capacidades que tengan en cuenta mínimos nutricionales
* Apoyo a iniciativas que permitan a las comunidades reemplazar alimentos introducidos de afuera, y cuyo aporte no es significativo en términos de nutrientes, por alimentos producidos localmente (p.e. producción propia de miel en lugar de azúcar).
* Promoción de comidas escolares propias del entorno cultural. Esto implica la certificación de productos provenientes de los sistemas tradicionales de cultivo para su consumo en instituciones públicas en Territorios Indígenas.
* Registro y protección de los sistemas alimentarios indígenas en sus componentes material e inmaterial.
* Formulación de planes de estudio de educación intercultural con componentes basados en los sistemas alimentarios indígenas.
* Construcción de estrategias agro-ecológicas complementarias para comunidades sedentarizadas con población creciente, y para sistemas de cultivo que sufren el impacto del cambio climático. - Promoción de sistemas indígenas de monitoreo y seguimiento ambiental y su articulación con sistemas multinivel y multitemporales.
* Protección de territorios donde existen sistemas alimentarios indígenas en estado de riesgo crítico (por medio del otorgamiento de derechos de propiedad colectiva sobre la tierra, p.e.).
* Reconocimiento real y efectivo del derecho al consentimiento previo, libre e informado sobre políticas y programas que afectan territorios y sistemas alimentarios indígenas.
* Viabilización de cadenas de producción y valor con enfoque diferenciado. En el marco de estas, los costos de certificación deberían tener en cuenta los beneficios ambientales y sociales de la producción sostenible.

Por su parte, y entre los desafíos que implica considerar los sistemas alimentarios desde un enfoque holístico, diferencial y situado, se listan entre otros los siguientes:

* Trascender un abordaje centrado en el concepto de seguridad alimentaria y abordar el tema desde la autonomía alimentaria, entendida como el “[...] derecho que le asiste a cada comunidad, pueblo o colectivo humano, integrante de una nación, a controlar autónomamente su propio proceso alimentario según sus tradiciones, usos, costumbres, necesidades y perspectivas estratégicas, y en armonía con los demás grupos humanos, el medio ambiente y las generaciones venideras” (Morales González, 2009). Esto lleva a reconocer que la nutrición implica a su vez decisiones de los sujetos en cuanto actores -y no agentes pasivos- de su propio bienestar.
* Contemplar un enfoque diferencial y situado a la hora de caracterizar la población de bajos ingresos. En el caso de los pueblos indígenas, los ingresos no son un indicador pertinente de desnutrición. El hecho de que no tengan ingresos constantes no significa, per se, el que no tengan acceso a alimentos nutritivos. En el caso de los pueblos indígenas del nororiente amazónico colombiano, por ejemplo, la pobreza no refiere a la ausencia de dinero para comprar alimentos, sino a la falta de un espacio propicio de cultivo. Esto lleva a considerar, no medidas asistencialistas, sino de fortalecimiento de los sistemas ancestrales de cultivo, cuya eficacia en el caso amazónico es demostrada por los altos índices de conservación de un territorio que es frágil en términos de fertilidad del suelo.
* Considerar los impactos generados, en los pueblos indígenas, por los productos que vienen de afuera, los cuales evidencian una problemática relevante: la de las basuras como consecuencia de la introducción de un pensamiento de orden económico que induce a nuevas formas de consumo, incrementando la dependencia a productos externos, y la consecuente acumulación de empaques plásticos y residuos en territorios que no tienen la capacidad de tratarlos. Lo anterior termina por afectar los suelos y fuentes hídricas de las que dependen los sistemas alimentarios indígenas (ACIMA y Gaia, 2019: 192).
* Relacionado con lo anterior, el punto 53-b, relativo a las mejoras de la calidad de los alimentos, se queda corto al no considerar la calidad de los suelos y salud de los ecosistemas como algo que influye directamente en lo primero. Esto ocurre al desconectar el alimento de la tierra que lo produce. Hablar de sistemas alimentarios implica, en ese sentido, considerar la nutrición desde los suelos, lo cual implica, a su vez, un enfoque agro-ecológico de relación multiespecie, sistemas rotativos, modelos sostenibles de ocupación del territorio, ciclos adaptados a las condiciones locales, y relaciones justas.

Por su parte, el sistema alimentario “ideal” es aquel que considera toda la cadena de producción del alimento, no sólo la relativa a su comercialización. En ese sentido, la formulación de políticas debe estar orientada a la protección, preservación y salvaguardia del entorno en el que se generan y se mantienen los sistemas alimentarios indígenas.

Por último, valdría la pena mencionar que un gran limitante a la hora de salvaguadar los Sistemas Alimentarios Indígenas y sus conocimientos asociados son las relaciones de mercado imperantes y la globalización de la industria alimentaria que, acompañada de una falta de regulación fiscal y enmarcada en la celebración de tratados de libre comercio desventajosos para los países “en desarrollo” -muchos de ellos parte del grupo de países Megadiversos en términos biológicos y de mayor diversidad lingüística-, sobrepone intereses económicos a preocupaciones éticas. Las economías extractivas y la acumulación por desposesión representan también un grave riesgo para estos sistemas alimentarios indígenas.

**5. ¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?**

En el caso de los sistemas alimentarios indígenas, las Directrices voluntarias podrían ser más útiles al promover y esclarecer caminos que permitan establecer, a nivel nacional, sistemas de certificación diferenciada ancladas a cadenas de producción y valor justas y sostenibles. En cuanto al nivel regional, el marco de estas Directrices voluntarias debe adecuarse a las aspiraciones, necesidades y expectativas de las comunidades locales, respetándose los derechos adquiridos por éstas en virtud de la legislación nacional e internacional.

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## Celia Acasio Rodríguez, CHIRAPAQ, Peru

Previo un saludo enviamos la contribución de CHIRAPAQ Centro de Culturas Indígenas del Perú a las Directrices Voluntarias sobre Sistemas Alimentarios y Nutrición.

**1. ¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030? ¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?**

1. El capítulo 1 refleja en parte la situación, debido a que los factores enumerados caen dentro de los aspectos coyunturales: centrarse en la situación actual de inseguridad alimentaria. Sin embargo, esta es el resultado de procesos estructurales que tienen que ver con el manejo del territorio, el empobrecimiento de grandes sectores de la población que en gran medida estuvieron ligados al ámbito rural y la producción de alimentos, la transformación de la geografía mediante la construcción de hidroeléctricas o la explotación de minerales e hidrocarburos y, en ese marco, la contaminación de tierras y aguas.

Lo señalado tiene que ver en la manera como se configura la actual la situación, en este sentido, los factores estructurales que tienen que ver con el reconocimiento o resarcimiento de derechos es un punto clave para dar inicio a cualquier proceso que garantice la seguridad alimentaria para lograr la soberanía alimentaria.

Un ejemplo. En el punto 11 se indica que entre las personas más vulnerables a la malnutrición “normalmente incluyen” a aquellas “que tienen menos control sobre sus opciones de alimentación” y se incluyen a los pueblos indígenas, entre otros. Si tenemos en consideración que la gran biodiversidad de plantas y animales ha correspondido a los procesos milenarios de adaptación, domesticación y diversificación emprendida mayoritariamente por los pueblos indígenas ¿a qué se debe su vulnerabilidad? ¿no sería más preciso atacar o afrontar las causales estructurales que los coloca en esta situación, al igual que a los pequeños productores agrarios y comunidades?

En este sentido proponemos agregar un punto referido a esta problemática:

*“ La malnutrición, en muchos aspectos, es el resultado de largos procesos de empobrecimiento y desconocimiento de derechos de sectores sociales que producían alimentos diversificados y como resultado de largos procesos de adaptación sin efecto residual en el medio ambiente. Entre estos productores, los pueblos indígenas son los más representativos y los que se encuentran entre los primeros sectores sociales con problemas de alimentación, ante la presión del mercado y la expansión de la propiedad privada o la explotación industrial de materias primas que afectan la calidad y propiedad del suelo y el agua o imponen hábitos alimenticios y precios que no hacen viable ni rentable la agricultura familiar comunitaria diversificada. Frente a este panorama, se requiere la promoción y afianzamiento de sus sistemas de producción de alimentos y el reconocimiento de derechos territoriales”.*

La vinculación entre lo propuesto y la Agenda 2030 es pertinente, sin embargo, falta un punto referente al objetivo 15 referido a Flora y Fauna Terrestres, señalando o precisando que esto no significa desalojar o impedir la práctica de sus sistemas de producción a los pueblos indígenas.

2. Entre los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables, tenemos que en el caso de los pueblos indígenas uno de los principales problemas es el desconocimiento de sus derechos territoriales, lo cual que impide el desarrollo integral de sus sistemas de producción de alimentos.

Unido a lo anterior, se encuentra el desprestigio impuesto en torno a los alimentos indígenas frente a los cuales los productos industriales cuentan con mayor reconocimiento o “prestigio”. Sin embargo, cuando algunos de estos productos alimenticios indígenas han sido reconocidos o empleados por la alta cocina o cualquier otro sector de “mayor” rango social, inmediatamente el alimento adquiere otro nivel y se pone fuera del alcance de la gran mayoría.

Así mismo, la relación costo/beneficio/rentabilidad para el agricultor. La industria alimentaria tiene la posibilidad de acaparar gran cantidad de insumos, ya sea a través de redes de acopio o mediante la monopolización de tierras. De ahí a estandarizar alimentos con altos contenidos de insumos químicos y crear alimentos mediante la investigación en patrones de sabores para delimitar gustos y preferencias forma parte de un proceso, que coloca a los alimentos primarios en situación de desventaja ya sea para su comercialización directa o posicionamiento en el gusto de la población.

**2. ¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?**

En líneas generales los principios rectores contenidos en el capítulo 2 son apropiados para nuestro contexto nacional y regional. Todos los principios son pertinentes, pero también bastante generales y claramente dan cabida a los sistemas industriales de producción y distribución de alimentos. De ahí que se haría preciso establecer un balance que permita, con nombre propio, dar cabida a otros actores y hacer hincapié en la necesidad de visibilizar su participación. De acuerdo a lo anterior sugerimos el siguiente principio:

“***Fortalecimiento de la producción diversificada, así como difusión de los aportes alimentarios indígenas o locales.*** *Promover una mayor diversificación y biodiversidad de alimentos basados en las tradiciones de producción local proporciona el acceso a fuentes de alimentación que pueden responder al cambio climático por una parte y a fortalecer y dinamizar la producción agrícola familiar-comunitaria. Así mismo, se precisa potenciar los conocimientos indígenas en cuanto a las propiedades nutricionales de sus alimentos*”.

**3. Considerando los ámbitos normativos identificados en el capítulo 3 y los factores propicios sugeridos en el párrafo 41 del borrador cero, ¿cuáles son los primeros pasos normativos que deberían analizarse en el capítulo 3, teniendo en cuenta la necesidad de fomentar la coherencia de las políticas y abordar su fragmentación?**

Entre los primeros pasos normativos sugerimos los de garantizar un marco normativo para la producción diversificada y el reconocimiento de los derechos territoriales, los cuales estarían contemplados dentro de la parte I referida a Cadenas de Suministro de Alimentos, específicamente en el punto 1 que trata de sistemas de producción.

Estamos conscientes de lo controversial que puede resultar para los Estados y la industria tratar estos temas, sin embargo, si tal como se plantea en esta sección se intenta abordar los factores que permitan asegurar la alimentación, estos puntos son cruciales.

En el punto h, referido a Investigación, Innovación y Desarrollo Agrícolas en Favor de las Dietas Saludables, sugerimos que el desarrollo comercial de alimentos y los cultivos bioenriquecidos, que son enunciados en el párrafo, no se basen en transgénicos o al menos en modificaciones genéticas que puedan resultar perjudiciales o restrictivas para la biodiversidad y la producción agrícola.

**4. ¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?**

Una de las primeras resistencias que podemos identificar es en cuanto al reconocimiento de los derechos territoriales indígenas por parte de los Estados y las empresas.

Otro desafío importante lo encontramos en el campo de las patentes, la biopiratería y los derechos de propiedad intelectual en cuanto al reconocimiento y aplicación industrial de alimentos o principios activos en plantas de uso indígena, los cuales no están contemplados en el documento y que permite por ejemplo que países como Australia y China produzcan mayores volúmenes y comercialicen a mayor escala la maca originaria y cultivada en la zona sur del Perú, entre otras plantas como por ejemplo la Uña de gato por sus usos medicinales.

Nuestro sistema alimentario “ideal” partiría del reconocimiento de derechos territoriales a los pueblos indígenas y la promoción e incentivo a sus sistemas de producción agrícola diversificada y la intervención de métodos y técnicas de otros sistemas de conocimiento que puedan potenciarlas y validarlas.

Esta diversificación productiva basado en alimentos originarios, deberían ser comercializados a un precio acorde con el trabajo y esfuerzo empleado, facilitándose su articulación a los programas sociales o apoyos alimenticios del entorno local, así mismo debe asegurarse el derecho al agua para la producción de estos alimentos y frenarse las iniciativas de privatización de los recursos hídricos.

La comercialización de alimentos debe articularse a un mercado que evite la menor intervención de intermediarios, quienes al final controlan el flujo de alimentos y por ende los precios, y recuperar la cultura de consumo estacionario de alimentos y no como sucede en la actualidad la demanda constante y permanente de alimentos, así estén fuera de estación. Dentro de esta cultura alimentaria se debe proseguir y profundizar en las iniciativas que apuntan a la reducción de los azucares, las grasas saturadas y el sodio. Una de las iniciativas en ese sentido, sería la articulación de la educación alimentaria a las escuelas tal como está propuesto en el documento.

Entre los indicadores, se tendría un “paquete” de alimentación formulado a partir de alimentos de estación y de acuerdo a cada región, lo cual tendría que ser una construcción ya de cada Estado y de acuerdo a su realidad.

**5. ¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?**

Consideramos que podrían ser más comprensibles, en cuanto a lo que proponemos, sobre la base de los principios de:

1. Recomposición de la producción y comercialización de alimentos, para su orientación a la diversificación de alimentos primarios.
2. Comercio justo y Estado de derecho, en cuanto al reconocimiento de los pequeños productores y pueblos indígenas que pueden mantener y sostener una producción diversificada con sostenibilidad del entorno natural, que al fin y al cabo contribuye a mitigar los efectos del cambio climático, por lo cual deben ser reconocidos en sus derechos territoriales y un pago adecuado a los productores agrícolas.
3. Justicia social, basada en el derecho a la alimentación y su articulación directa o con menos intermediarios entre el productor y el consumidor final.

## Diego Chiguachi / Gloria Eraso, Colombia

Cordial saludo, adjunto envío documento que recoje el análisis y aportes a las directrices voluntarias sobre sistemas alimentarios y nutricion.

Buen camino.

Textos Por Diego Chiguachi[[2]](#footnote-2) y Gloria Eraso[[3]](#footnote-3).

**1. ¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030? ¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?**

**El capítulo I refleja el contexto mundial. A continuación un aporte desde los pueblos indígenas de Colombia.**

El problema central dentro de los resguardos a abordar es la perdida de los saberes y medios materiales para que la producción alimentaria autónoma siga siendo la principal aportante de alimentos para los núcleos familiares. Problema que se refleja en alarmantes niveles de desnutrición que afectan de manera silenciosa pero contundente la pervivencia física y cultural de las poblaciones indígenas del país. El DANE[[4]](#footnote-4) tiene en cuenta la desnutrición o alguna deficiencia nutricional, como causa directa de muerte, y como una de las causas antecedente de estado patológicos importantes y que pueden aparecer en la causa de defunción como lo dicta la Clasificación Internacional de Enfermedades que pueden aparecer en el certificado de defunción del infante[[5]](#footnote-5)

Este fenómeno puede considerarse consecuencia de múltiples factores estructurales entre los que se encuentra principalmente: la disminución de áreas para el cultivo de alimentos autóctonos ricos en proteínas, vitaminas y minerales, la sustitución de la dieta tradicional por alimentos procesados de bajo valor nutricional, con riesgos potenciales para la salud del consumidor y que no contribuyen a dinamizar la economía local; y la falta ausencia de una política publica para manejo de la desnutrición indígena construida participativamente que posibilite la aplicación de un enfoque diferencial

Los anteriores factores estructurales han confluido para configurar un factor sociocultural igual de determinante que se refleja en la pérdida progresiva de los saberes ancestrales relacionados con la alimentación, de las semillas nativas, de las prácticas agrícolas tradicionales y sustentables así como de los hábitos y prácticas de cuidado que históricamente han pervivido en estas poblaciones. Y la más afectada por estas circunstancias ha sido la población infantil y joven de los pueblos indígenas.

**Situación nutricional actual en las poblaciones indígenas.**

Según el DANE en el censo general para el 2005 en Colombia existen 1.392.623 indígenas pertenecientes a 102 grupos étnicos[[6]](#footnote-6) de los cuales 50.5% son hombres y 49.5% son mujeres, el 7,5% de la población son niños entre 0 y 4 años, lo que corresponde aproximadamente a 97.500 niños. La relación niños mujer (RNM) indica cuantos niños hay por cada 100 mujeres en edad fértil, en comunidades indígenas este índice es de 62.2% en comparación en la población nacional por cada 100 mujeres en edad fértil hay 37 niños menores de 5 años.

De acuerdo a cifras oficiales existen elevados índices de desnutrición en diversas poblaciones indígenas de Colombia. La Encuesta Nacional de la Situación Nutricional en Colombia –ENSIN[[7]](#footnote-7)-.recoge información sobre el estado nutricional de la población indígena por indicadores antropométricos y bioquímicos, ingesta dietética, seguridad alimentaria en el hogar, lactancia materna, alimentación complementaria, actividad física entre otros. Sus resultados muestran la magnitud de la desnutrición infantil en Colombia y en especial el alto grado de vulnerabilidad nutricional de la población indígena comparada con otros grupos poblacionales. La prevalencia de desnutrición crónica[[8]](#footnote-8) –DC en adelante- en niños y niñas menores de cinco años a nivel nacional es de 13%, que corresponden a 212.000 niños. La prevalencia de DC en niños y niñas indígenas de esta edad es la más alta, con 29,5% lo que corresponde a 28.750 niños[[9]](#footnote-9), frente a un 10,6% en afrodescendientes y 12,6% en población mayoritaria. Lo mismo sucede con la prevalencia de DC severa de 9,4% en niños indígenas frente a 1,8% entre afrodescendientes y 2,4% en población mayoritaria. La prevalencia de desnutrición global[[10]](#footnote-10) –DG en adelante- en menores de cinco años a nivel nacional es de 3,4% (considerado a nivel internacional como una prevalencia baja) mientras que en los niños y niñas indígenas de la muestra, la prevalencia es más del doble: 7,5%. Si no se trata prontamente, la DG puede volverse DC.

Investigaciones realizadas por universidades reportan que estudio realizado por establecieron que entre 1998 y 2002 el porcentaje de desnutrición reportada como causa de muerte fue del 6,66 por ciento y como causa asociada del 7,45 por ciento, para un total de 14,11 por ciento [[11]](#footnote-11). A los datos anteriores habría que sumarle el subregistro, estimado en 32%, según lo anterior el Observatorio sobre Infancia Observatorio de Seguridad Alimentaria y Nutricional U. Nacional de Colombia estima en 3000 las muertes anuales de niños entre 0 y 5 años en Colombia[[12]](#footnote-12).

La desnutrición crónica ocasiona baja estatura y el bajo peso corporal, que marcan a los sobrevivientes de por vida, con un agravante: su cerebro es, literalmente, subdesarrollado, lo que aumenta su vulnerabilidad social. Difícilmente podrán tener buenos desempeños escolares, obtener trabajos bien remunerados y autonomía económica (Sarmiento, 2015)[[13]](#footnote-13). Por eso una tarea de nuestra guardia Indígena es recuperar semillas, porque con hambre no hay buen vivir, con hambre tampoco se lucha.

Las tendencias se mantienen en el grupo de 5 a 17 años. Mientras en promedio la prevalencia de la DC a nivel nacional es de 9,8%, la prevalencia en niños indígenas es de 29%, esto es casi cuatro veces la presentada en población afrodescendiente (7,7%) y tres veces la encontrada en los otros (10%). Para la DC severa, los datos son igualmente más graves para niños y niñas indígenas que presentan una prevalencia de 6,3%, frente a 0,8% en afrodescendientes y 1,3% a nivel nacional.

La ENSIN también informó sobre la prevalencia de anemia y encontró que en niños y niñas indígenas de 6 a 59 meses la presencia de anemia fue de 27,5%. En la muestra de niños indígenas de esa edad hubo una prevalencia de 33% y una diferencia significativa con el grupo de otros (26%), En niños y niñas de 5 a 12 años de edad, el estudio encontró que 8% tiene anemia y de éstos, 7,5% presentó anemia por deficiencia de hierro, sin diferencias significativas por edad, sexo ni etnia[[14]](#footnote-14). Los departamentos que presentan una prevalencia de DC superior al 20%, considerado a nivel internacional como prevalencia mediana, son Vaupés, Amazonas, La Guajira, Guainía y Cauca; todos con elevada presencia de población indígena.

Si bien la situación nutricional de los diferentes pueblos indígenas es similar, las cifras varían de región a región en los casos en los que se tenga acceso a esta información. Uno de los casos más graves es el de los niños y niñas indígenas del Chocó. Según la Organización Regional Embera Wounaan, la probabilidad de que un niño indígena en el Chocó muera antes de los cinco años de edad por enfermedades infecciosas y parasitarias es 60% superior al de un niño no indígena, y por desnutrición es 90% mayor.

Al respecto, es de mencionar que una de las dificultades para comprender y abordar este problema en sus reales dimensiones, es la falta de información completa y confiable sobre la situación nutricional de las poblaciones indígenas según cada región, comunidad y con énfasis en los diferentes grupos etarios. La gravedad de esta falencia reside en que la información faltante es clave para que tanto el Estado como organismos de la sociedad civil de orden nacional e internacional definan planes, programas y proyectos cuyos lineamientos sean pertinentes y respondan oportunamente a los contextos y situaciones particulares de las diferentes poblaciones.

En la actualidad no existe un perfil epidemiológico de las comunidades indígenas, no se sepa cuál es la incidencia de la desnutrición en los niños y niñas de cada una de ellas. Así mismo se desconoce la cobertura de los programas de salud y el impacto de otros programas preventivos ni se cuenta con información suficiente sobre la utilización de dichos servicios.

Un factor que acentua y favorece la desnutricion infantil indigena es la falta de entendimiento del Estado de las logicas indigenas. La agrobiodiversidad nativa constituye para nosotros los pueblos indígenas, un elemento central para prevenir el cambio cultural, pues garantizan la existencia de agro ecosistemas sustentables proveedores de alimentos seguros y nutritivos, medicinas a bajo costo. Desde el nacer del mundo como pueblos originarios humanizamos la naturaleza, domesticamos los cultivos que hoy nos alimentan, prueba de ello es la domesticación del maíz, donde su ancestro silvestre, *Betata* en Embera, es muy diferente al maíz que hoy conocemos.



Figura 1. Domesticacion del maiz. De izquierda a derecha: 1. Teocinte (ancestro del maiz) 2. Maiz sioux (Mexico) . 3. Maiz pollo . Garagoa. Boyaca. 4. Maiz pira. La Palma. Cundinamarca. 5. Maiz huevito. San Andres de Sotavento. Cordoba. 6. Maiz tacaloa. San Andres de Sotavento. Cordoba. 7 . Maiz amarillo grande. Guican. Boyaca. 8. Maiz Clavo. Mercaderes. Cauca. Fotografia. Federman Contreras.

Cuando cuidamos las semillas nativas se amplían las oportunidades de pervivencia para las generaciones presentes y futuras, al conservar activamente la diversidad cultivable de la que derivamos nuestro sustento, además favorecemos su diversificación.

Hoy Gobierno nos plantea un falso dilema. Distrae nuestra atención. Intenta conducir el debate hacia lo jurídico, sobre la calidad e inocuidad de las semillas. Para nosotros como pueblos indígenas aquello que está en riesgo es la ley de origen que está contenida en los alimentos y la existencia misma de las semillas nativas. Cuando recordamos nuestra ley de origen o derecho mayor, hablar de propiedad intelectual sobre la semillas es incomprensible, quien puede decir que el aire, el viento, el agua, en resumen la vida puede tener dueño? El asunto de la propiedad intelectual sobre las semillas pasa por lo jurídico, es mucho más que eso.

Está claro que la política Colombiana relacionada con la gestión de los recursos geneticos es, sino equivocada, por lo menos incompleta, pues restringe el transito libre de las semillas nativas a través de resoluciones como la 3168 y la ley 1032, desconociendo que el 75% de los alimentos son producidos por pequeños productores ancestrales, comunitarios e indígenas que prevalentemente usan semillas no certificadas, política que promueve la colecta y conservación *ex situ*, mas no establece mecanismos claros de reintroducción de semillas desde bancos de germoplasma hacia comunidades que donaron de buena fe sus semillas, a pesar de reiteradas peticiones de resguardos Indígenas como el caso de los indígenas Zenu de San Andrés de Sotavento quienes de la mano con el Ministerio de Cultura han solicitado reiteradamente muestras de los maíces colectados en su territorio a CORPOICA sin obtener respuesta, política que no financia adecuadamente la conservación de los recursos geneticos y hacen que Colombia no haya presentado información para el Segundo Informe sobre el estado de los recursos Fitogeneticos para la Alimentación y la Agricultura en el Mundo a diferencia de países como Ecuador, Guatemala, El Salvador, Chile, Nicaragua, Perú, Uruguay y Venezuela, política que no acata principios contemplados en el Protocolo de Cartagena como el principio de precaución, y conceptos de instancias nacionales como el Ministerio de Ambiente quien en 2007 determino que no se habían realizado suficientes estudios de bioseguridad y sugirió no autorizar la liberación de cultivos OGM en el país; hoy nos tiene muy preocupados la contaminación transgénica del maíz nativo en Colombia, demostrada por estudios de nuestra organización, la Universidad Nacional y la Red de Semillas Libres, por ello aportamos a este movimiento el Boletín “Situación del Cultivo de Maíz Transgénico en Colombia 2015” donde ubicamos de manera georeferenciadas cada hectárea de maíz OGM existente en el país y lo superponemos con las áreas de resguardos Indígenas

**2. ¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?**

Principio 1: Inclusión de la cosmovisión propia de los pueblos indígenas en los procesos de formulación de política pública agrícola, y en los programas de enseñanza universitaria.

Los pueblos originarios han sabido mantener sus generaciones fuertes y bien alimentadas desde el origen de los tiempos, diferentes usos y costumbres, custodiadas y transmitidas oralmente a través de su ley de origen, que impone tiempos de veda para la caza, la pesca o la restricción de acceso a lugares sagrados, que aseguran los nacimientos de agua, lugares de anidamiento y reproduccion de animales considerados sagrados, como el Condor de los Andes y el Oso Andino, entre otras. Todo este tejido cultural ha permitido la conservación ecológica de los ecosistemas, en Colombia la tercera parte de territorio nacional, esto es 32 millones de hectáreas están bajo el control de las Autoridades Indígenas y sus esquemas de Gobierno Propio, en estos territorios nacen la mayor parte de los ríos que abastecen de agua a las crecientes ciudades colombianas. Occidente tiene la necesidad de entender y poner en términos científicos, el porqué del éxito de dicha manera de habitar los territorios, todos los hallazgos reportados, se deben incorporar en los procesos de innovación, ciencia y tecnología que desarrollan los centros de investigación y formación, en la construcción del proyecto de Nación.

Principio 2. Respeto por parte de los Estados de los derechos territoriales de los pueblos originarios.

En 2018, el gobierno colombiano anuncio al mundo que el Parque Nacional Natural Serrania del Chibiriquete se ampliaba de 1.486.676 a 4.268.095 hectáreas, posterior al anuncio de la UNESCO de declararlo Patrimonio de la Humanidad. Posterior a ello el Gobierno informo de la llegada de recursos financieros para su cuidado, sumados a los ya cuantiosos fondos de cooperación ambiental internacional recibidos de países como Noruega, Alemania, y entidades como el Banco Mundial, Fondo Cooperativo para el Carbono de los Bosques, entre otros; para financiar programas como Bosques territorio de Paz, la Alianza contra la Deforestación y Visión Amazonia, Orinoquia Pacifico. Todos estos programas fueron formulados sin la participación de los pueblos que habitan dichos territorios, violando los principios de Consentimiento Previo, Libre e Informado. En nombre de la paz, y a expensas de los territorios que los pueblos originarios han sabido conservar y defender, se promueve una bioeconomia sin debatir aspectos centrales, puntos de desencuentro históricos, bien saben los pueblos indígenas que declaratorias de “Patrimonio de la Humanidad” limitan su ejercicio de Gobierno Propio, lo sucedido con Teyuna o Ciudad Perdida, copada hoy por turistas bajo la administración del Instituto Colombiano de Antropología e Historia, quien articula con empresas de turismo no indígenas, paradójicamente, la comunidad Wiwua, descendientes directos de los constructores de Teyuna, hasta hace muy poco debían contratar guías occidentales, para que, legalmente, se les permitiera la entrada con grupos de turistas a lo que desde siempre ha sido su territorio.

Es necesario que el Gobierno disponga su positiva voluntad para el fortalecimiento de gobierno propio de los Pueblos Indígenas en sus territorios y en protección de la biodiversidad que estos albergan. Las culturas originarias y las comunidades locales conocen y han contribuido eficazmente en la conservación dinámica de la biodiversidad, las acciones sostenibles en uso y aprovechamiento de la biodiversidad y una visión de largo plazo para el acceso a estos recursos genéticos y biológicos debe partir del respeto y las garantías para la participación plena y efectiva de las autoridades y de las organizaciones indígenas.

Investigación articulada con los compromisos internacionales de protección al conocimiento tradicional, y distribución justa y equitativa asociada al uso de los recursos geneticos.

Los Jaibanas del Pueblo Embera Katio, ubicados en las montañas donde nacen los ríos Sinu y San Jorge, conservan, entre sus conocimientos, cual es la combinación de plantas que permite en horas curar la picadura de una venenosa serpiente conocida como Mamba negra, no deben inyectar equinos y filtrar su plasma para obtener el suero antiofídico, como se hace en procesos de producción comercial. Dado que algunas de sus comunidades se ubican a días de camino de cualquier centro poblado, este Saber significa la diferencia entre la vida y la muerte para quien sufre un accidente de picadura; encontrar dicha fórmula, fue el resultado de cientos de generaciones que experimentaron con verdadera actitud científica tan delicado problema. Cuantas muertes humanas podrían evitarse difundiendo dicho conocimiento? Porque no se ha hecho? Increíblemente Colombia está 25 años rezagada frente sus vecinos latinoamericanos al no ratificar protocolos que obligan al Estado a diseñar rutas de distribución justa y equitativa de beneficios. Los Diagnósticos de Agrobiodiversidad realizados con apoyo del Ministerio de Agricultura y Desarrollo Rural, a partir de metodologías concertadas y controladas por las Autoridades Indígenas, son un paso en el camino correcto[[15]](#footnote-15).

Es muy necesario que el gobierno colombiano comprenda como una riqueza las diferencias culturales y fortalezca su gestión de la biodiversidad de la mano de los pueblos indígenas, en especial en temas como la protección a los conocimientos tradicionales y prácticas y en el acceso a los recursos genéticos de sus territorios, asuntos que son un núcleo esencial de sus culturas.

Agronómicamente existen diversas posibilidades de articular conocimiento tradicional y técnica, para afrontar retos que otrora no afrontaban los Sistemas Alimentarios Indígenas.

* Eficiencia energética: Elevar el rendimiento por unidad de área empleando métodos culturalmente apropiados que no comprometan la autonomía o los derechos colectivos, por ejemplo el mejoramiento Participativo sin involucrar leyes de UPOV,
* Recuperación de la fertilidad natural de los suelos: anteriormente la rotación de campos de cultivo solucionaba este aspecto fundamental en la sostenibilidad de los agroecosistemas indígenas, fenómenos históricos ubicaron a los pueblos originarios en tierras prevalentemente no aptas para agricultura, con problemas de pendiente, riego, vías e infraestrucutra; por lo tanto es necesario la promoción de métodos agroecologícos de manejo de la frtilidad, ganadería estabulada, métodos de diagnóstico sencillo como la cromatografía de suelos, etc.
* Para el caso Colombiano, establecer hoja de ruta para implementación de la política para la adquisición, manejo y entrega de recursos biológicos en Bancos de Germoplasma, con comunidades indígenas, a fin de reintroducir ecotipos de interés agrícola que han desaparecido en territorios indígenas.

El estado colombiano en virtud de su misión de garante del interés público debe apoyar la participación plena y efectiva de los pueblos indígenas y campesinos, en la elaboración de normativas y políticas que reconozcan sus formas de producción agrícola y las que regulen el acceso a sus conocimientos tradicionales sobre la biodiversidad. La participación exclusiva del sector privado agroindustrial en el diseño de estas normas, puede resultar en favorecimiento de interés privados por sobre el interés general y pone en riesgo la sostenibilidad ambiental y cultural de este recurso y de los pueblos indígenas.

Es necesario y coherente con la protección de la diversidad biológica, el reconocimiento legal para las semillas de la agrobiodiversidad colombiana. Deben formularse políticas de fomento y apoyo para los pueblos y comunidades locales que hacen conservación in situ de esta diversidad biológica. La normativa debe hacer el reconocimiento de los derechos indígenas y campesinos, favorecer la investigación participativa, la conservación y producción in situ de esta agrobiodiversidad, sin la imposición de protocolos técnicos homogéneos ni certificaciones externas, que no logran comprender la diversidad biológica, su conservación y reproducción y la realidad social del campesinado y de los pueblos indígenas.

**3. Considerando los ámbitos normativos identificados en el capítulo 3 y los factores propicios sugeridos en el párrafo 41 del borrador cero, ¿cuáles son los primeros pasos normativos que deberían analizarse en el capítulo 3, teniendo en cuenta la necesidad de fomentar la coherencia de las políticas y abordar su fragmentación?**

**Cumplimiento de los acuerdo de Paz. El pueblo Embera Katio de Quebrada Cañaveral a pesar de estar mencionados en el Acuerdo Genera Para la Terminación e Conflicto, no ha sido priorizada en las acciones de la Dirección para la Acción Integral contra Minas Antipersonas -DAMIA- FALTA COMPLETAR ESTA IDEA**

Colombia enfrenta el proceso de actualización del Plan Estratégico de **Ciencia, Tecnología e Innovación,** del Sector Agropecuario Colombiano, (2017-2027) –PECTIA-, en dicho proceso la Comisión IV trabaja en el eje transversal; “acceso a recursos genéticos, PI para el sector agroindustrial”, en la estrategia 1 se señala como propósito;

*Fortalecer y coordinar marcos políticos y normativos flexibles, que dinamicen y regulen los procesos de acceso a recursos biológicos, genéticos y de protección a la propiedad intelectual, para impulsar el desarrollo tecnológico y la innovación del sector.*

Y señala entre sus metas *”Optimizar los tramites y tiempos de respuesta y la protección del conocimiento tradicional”.*

La Organizacion Nacional Indigena de Colombia saluda que el proceso del PECTIA haya iniciado lo que han llamado “la gestión integral de la biodiversidad”, lamentamos, sin embargo, lamentamos el no haber sido invitados a aquellos espacios discutidos principalmente entre entidades de Gobierno y representantes de los gremios, ya que la protección, uso y aprovechamiento de los conocimientos tradicionales sobre la biodiversidad de los pueblos indígenas es un asunto central nuestras culturas, su pervivencia y la garantía de sus derechos. Por ello queremos hacer algunas reflexiones y una solicitud;

1. El Convenio de Diversidad Biológica, CDB, ratificado por la ley 165 de 1994 reconoció que la biodiversidad es fundamental para el mantenimiento de la vida en la tierra, y reconoció el esencial papel que en su conservación tienen los pueblos indígenas y las comunidades locales. A 25 años de la ratificación del CDB muy poco se ha desarrollado en el país en conservación de la biodiversidad y menos aún en políticas de fomento a la conservación dinámica que los pueblos originarios y campesinos hacen a través de sus prácticas, saberes y conocimientos tradicionales. Por otro lado Colombia ha sido respetuosa de la Propiedad intelectual haciendo parte de todos los tratados que la reconocen y regulan, se han construido instituciones y asignado competencias para los trámites de su otorgamiento, defensa y protección. Por ello identificamos un grave desequilibrio en las metas que propone el PECTIA, proponiéndose más protección frente a la total orfandad reglamentaria en que están los conocimientos tradicionales.
2. Colombia es el país más biodiverso del planeta, no de esa misma manera se destaca en procesos de investigación y desarrollo, o por poseer infraestructura para investigación científica o por haber hecho procesos de trasferencia tecnológica robusta o importante, es entonces paradójico la honda preocupación por la protección de la propiedad intelectual y tan poco por el recurso estratégico de importancia mundial. Las cifras de titularidad de la PI ilustran esta desigualdad, de los registros en el país de Obtenciones de Variedades Vegetales, solo el 7% pertenecen a algún gremio o gran empresa colombiana, el porcentaje en patentes es aún menor. La labor estatal por tanto, debe centrarse en cerrar la brecha y el atraso que se tiene en conocimiento y protección del recurso que le es propio y que representa el reconocimiento del trabajo esforzado y discreto de comunidades colombianas que viven en los más apartados territorios.
3. Por ultimo La Constitución Política de 1991 reconoce el carácter pluriétnico y multicultural del Estado y, en ese sentido, protege la diversidad étnica y cultural de la nación colombiana, a esta idea ha dado fuerza a través de guías de interpretación y aplicación, la Corte Constitucional, en una abundante jurisprudencia. Uno de los principales mecanismos para hacer efectiva tal protección es la consulta previa de los pueblos y las comunidades étnicas, en las medidas y proyectos que puedan afectar sus derechos y en especial su permanencia como grupos cultural, social, económica y políticamente diferenciados.

La consulta previa, como mandato derivado del Convenio 169 de la OIT, aprobado en Colombia mediante la ley 21 de 1991 y erigida por la Corte Constitucional en derecho fundamental, es un proceso de profundización de la democracia deliberativa en perspectiva intercultural, que toma en cuenta las distintas cosmovisiones, cultura y ancestralidad de los grupos étnicos, y parte del respeto a su autonomía. El carácter pluriétnico de nuestro estado tiene como consecuencia el deber de respeto a las visiones distintas del “desarrollo” y del “progreso” aportando una perspectiva más innovadora sobre estos conceptos, pues la visión “occidental” está hoy cuestionada desde la ciencia y la academia por sus efectos severamente destructores de los recursos y entornos naturales.

Como se ha afirmado desde Naciones Unidas por parte de Gay McDougall experta Independiente sobre cuestiones de las minorías “[P]persiste la situación de marginación estructural generalizada de la población indígena y afrocolombiana. Los lugares con alta densidad de esta población corresponden a las zonas del país con los mayores índices de pobreza extrema: superior al 60%”. La experta señala que a menudo las minorías no se benefician de las estrategias nacionales ni siquiera para alcanzar las metas en el contexto de los Objetivos de Desarrollo del Milenio, debido a que los mecanismos de política no tienen en cuenta las situaciones particulares y el impacto de la discriminación”.

**4. ¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?**

Desde 2015 la ONIC ha visto construyendo e implementando un programa que privilegia el reconocimiento de las comunidades locales como protectoras del conocimiento asociado a los recursos geneticos, a través de diagnósticos participativos etnobotanicos y gastronómicos, generamos y fortalecemos capacidades locales para la conservación a través de articulación de redes, cursos de extensión, iniciativas pedagógicas.

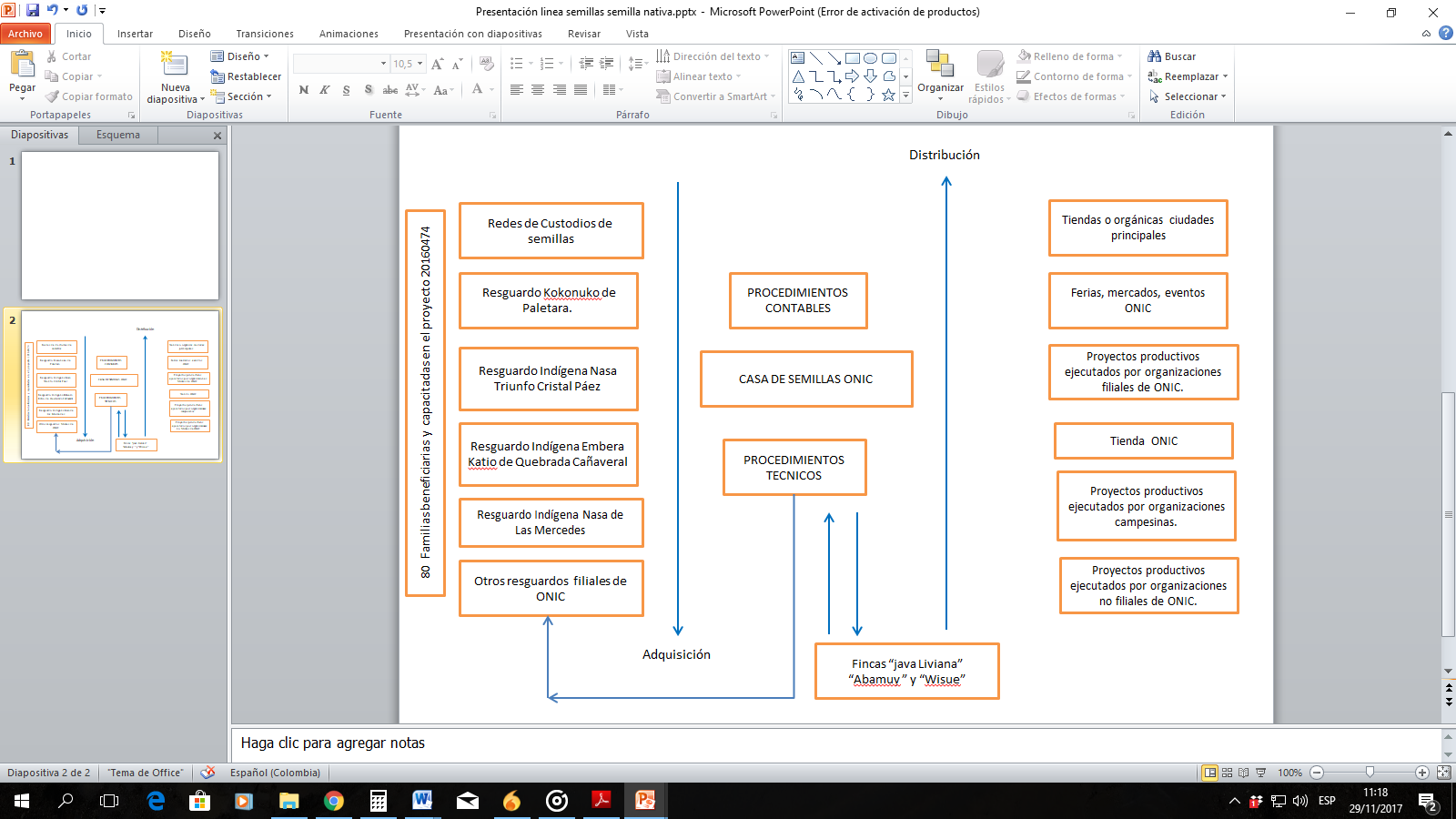
En 2016 gracias a la presión política y la toma pacifica al edificio central del Ministerio de Agricultura y Desarrollo Rural, que durante un mes y medio realizaron las 49 organizaciones indígenas filiales ONIC, se concertó el apalancamiento de 54 proyectos productivos por un valor de 17 millones de dólares aproximadamente. Como proyecto estratégico de ONIC, destino poco menos de un millón de dólares para el desarrollo y pilotaje de un programa de fortalecimiento de la economía propia, esquema que incluye la comercialización de semillas nativas, hoy ONIC articula con cuatro resguardos capacitados en comercialización y producción de semillas, cada uno de aquellos resguardos tiene implementada una casas de semillas dotada convenientemente con infraestructura y materiales, empaques de semillas para su comercialización, registro de marca.

La Línea Semillas busca contar de manera permanente en las instalaciones de la Organización Nacional Indígena de Colombia con semillas nativas en cantidad y calidad acorde con los principios del movimiento indígena, el sistema se abastece de las semillas que semana a semana son enviadas desde Resguardos, donde un equipo de ingenieros agrónomos indígenas realizan todos los procedimientos técnicos que aseguran entregar buena semilla. En paralelo la Consejería de Planeación, Administración y Finanzas coordina todo el plan de mercadeo que permite llevar aquellas semillas a tiendas orgánicas en ciudades principales y ofrecerlas a proyectos productivos y de soberanía alimentaria. Las semillas consideradas escasas se multiplican en el centro de Pensamiento Java Liviana, propiedad de la ONIC, e ingresan al circuito.

En este corto camino recorrido la organización ha identificado aspectos que orientaran nuestro accionar

* Principalmente debemos fortalecer los procesos de producción propia, aportantes de semillas nativas sanas en buena cantidad. La adopción de la agroecología como práctica productiva, la transición como camino, el ejemplo como discurso. Otro proyecto ejecutado en paralelo fue la implementación de un sistema productivo agroecológico en el centro de pensamiento Java Liviana, que funciona a manera de parcela demostrativa, cuando se realizan asambleas de autoridades indigenas

Figura 1. Esquema de funcionamiento general de la línea semillas.



* El creciente interés por la producción agroecológica expande el mercado potencial para las semillas nativas. Aquello trae retos para sincronizar y simplificar SGPs de semillas, casas de semillas, empaques, catálogos, formas de almacenamiento, planes de producción, formas de producción. El dialogo de saberes es fundamental, es necesario articular técnica y conocimiento ancestral para lograr que las semillas que comercializa ONIC representen una opción a un precio razonable, estas semillas deben estar disponibles en cada tienda agrícola, para que el agricultor indígena o campesino realmente pueda elegir.
* El 5 de Julio de 1996 cuando los pueblos Indígenas Ocuparon la Conferencia Episcopal Colombiana exigimos a Gobierno abstenerse de negociar políticas relacionadas con los recursos geneticos. Se reafirma que en el territorio Colombiano existen 104 naciones, 103 indígenas y la Republica de Colombia. Por lo anterior el estado Colombiano no puede abrogarse el derecho a decidir sobre los recursos geneticos que hacen parte del patrimonio inmaterial de los pueblos indígenas. La autonomía como principio organizativo ha sido materializado y legislado en otros aspectos como el Decreto 4633 de 2011 y Decreto 1953 de 2014 entre otros, exigiremos consulta previa ante cualquier decreto que pretenda restar autonomía y restringir el tránsito de las semillas nativas, a través de la Mesa Permanente de Concertación MPC. Este sentir también aplica para algunas ONGs que hablan en nombre de los Pueblos Indígenas de Colombia respecto al uso y conservación de sus recursos geneticos, la posición oficial de los pueblos indígenas se expresa únicamente a través de sus autoridades.

5. **¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?**

Entre los factores más relevantes de la sustentabilidad de los sistemas alimentarios indígenas, esta todo lo relacionado con la preservación de los recursos geneticos que los soportan, por ello , las Directrices Voluntarias debieran contemplar medidas tendientes a fortalecer las organizaciones y comunidades indígenas para garantizar disponibilidad de semillas nativas y criollas en calidad y cantidad, acorde con los principios del movimiento indígena y agroecológico.

Es necesario involucrar a las autoridades indígenas DIRECTAMENTE en las discusiones sobre recursos fitogenéticos, corazón de la matriz productiva indígena (TIRFAA, CDB, 8J, etc). Algunas ONGs insisten y se benefician de mantener distancia entre organizaciones indígenas y organismos multilaterales.

Contribuir en el seguimiento de los protocolos internacionales suscritos por Colombia, que como el Protocolo de Cartagena, o Protocolo de Seguridad en la Biotecnología, fueron reglamentados parcialmente en el país, rompiendo la coherencia misma del Protocolo y elaborando una situación de riego de polución genética de la biodiversidad colombiana. Algunos aspectos omitidos y que no han sido operativizados son por ejemplo el etiquetado de Organismos Genéticamente Modificados (OGM) y sus productos derivados y la participación, información y formación a las comunidades en las zonas de siembra de OGM para la prevención y gestión del riesgo de polución genética.

Vigilar el cumplimiento del acuerdo de la Minga Nacional por la Defensa de la Vida, los Territorio y la Paz, en relación con la contaminación transgénica de maíz, afectación irreversible del patrimonio genético y cultural de los pueblos Indígenas, demostrado por la Organización Nacional Indígena de Colombia y el Ministerio de Agricultura y Desarrollo Rural[[16]](#footnote-16), dicho acuerdo reza:.

El Ministerio de Agricultura y Desarrollo Rural llevará a la sesión del abril del consejo superior del Sistema Nacional de Innovación Agropecuaria SNIA las solicitudes de ONIC para presentar las afectaciones de casos de polución transgénicas encontrados en resguardos indígenas y la inclusión de destinación de presupuestos para líneas de investigación en temas de transgénicos y protección de la biodiversidad, con el fin de ser incluido en la agenda de la siguiente sesión del SNIA.

Apoyar la participación directa de las organizaciones de los pueblos indígenas y de las organizaciones campesinas en los espacios internacionales donde se debate y decide los aspectos normativos y de políticas sobre protección de la Diversidad biológica, el Cambio Climático o la relación medio ambiente y Desarrollo, para favorecer la comprensión global de otras formas de conocimiento que entienden y viven de manera más armónica con los entornos naturales. Es deseable que en el Grupo de Expertos Técnico Especiales sobre los Derechos de los Agricultores del Tratado Internacional sobre los Recursos Fitogenéticos se incluya un representante indígena permanente que lleve la voz de los pueblos originarios del mundo.

Finalmente, seria enriquecedor generar los espacios de dialogo y debate con las autoridades indígenas alrededor del espíritu y alcance de las Directrices Voluntarias y conceptos como soberanía alimentaria, dieta saludable, el derecho a la alimentación adecuada, el entendimiento, perfeccionamiento e inclusión de dichas categorías de análisis en la agenda indígena demanda de su armonización con las propuestas en curso

## FAO Publications

Here is a selection of titles proposed by FAO Publications for forum participants who would like to read more on food systems and nutrition.

[FOOD SYSTEMS IN AN URBANIZING WORLD](http://www.fao.org/3/I8346EN/i8346en.pdf)  
This report presents a narrative stressing the centrality of food to the future of cities, countries and the planet — to jobs, human health, food security and climate change – and proposes the TRANSFORM framework to develop food-smart cities.

[INTEGRATING FOOD INTO URBAN PLANNING](http://www.fao.org/3/CA2260EN/ca2260en.pdf)  
Through a range of successful examples, spanning from the Tsukji market in Tokyo to urban agriculture in Lima, this paper shows that a systemic approach to integrating food into urban planning is crucial to increase food security and nutrition.

[URBAN FOOD SYSTEMS DIAGNOSTIC AND METRICS FRAMEWORK](http://www.fao.org/3/CA1428EN/ca1428en.pdf)  
This paper concludes that future development of urban food diagnostic frameworks should embrace current trends in participatory data collection and emerging analytical techniques, including geospatial analysis and big data.

[FAO FRAMEWORK FOR THE URBAN FOOD AGENDA: LEVERAGING SUB-NATIONAL AND LOCAL GOVERNMENT ACTION TO ENSURE SUSTAINABLE FOOD SYSTEMS AND IMPROVED NUTRITION](http://www.fao.org/3/CA3151EN/ca3151en.pdf)  
This publication argues that to develop food systems sustainably requires an interconnected approach that involves rural-urban synergies, social inclusion, equity and resilience.

[BACKGROUND NOTES ON SUSTAINABLE, PRODUCTIVE AND RESILIENT AGRO-FOOD SYSTEMS: VALUE CHAINS, HUMAN CAPITAL, AND THE 2030 AGENDA](http://www.fao.org/3/ca5385en/ca5385en.pdf)  
Used to support discussions in the G20 Agriculture Ministers meeting in May 2019, these notes focus on farmers’ participation in value chains, the need to support human capital in agriculture, and the contribution of agriculture to the 2030 Agenda.

[STRENGTHENING NUTRITION ACTION](http://www.fao.org/3/CA1505EN/ca1505en.pdf)  
This document supports stakeholders in translating the Second International Conference on Nutrition recommendations into country-specific actions, through 24 thematic sheets, ranging from food loss and waste prevention to social protection for nutrition.

Further reading

[ENABLE INCLUSIVE AND EFFICIENT AGRICULTURAL AND FOOD SYSTEMS](http://www.fao.org/3/ca3921en/ca3921en.pdf)

[VOLUNTARY STANDARDS FOR SUSTAINABLE FOOD SYSTEMS: CHALLENGES AND OPPORTUNITIES](http://www.fao.org/3/a-i3421e.pdf)

[STRENGTHENING SECTOR POLICIES FOR BETTER FOOD SECURITY AND NUTRITION RESULTS. FOOD SYSTEMS FOR HEALTHY DIETS](http://www.fao.org/3/CA2797EN/ca2797en.pdf)

[EMPOWERING YOUTH TO ENGAGE IN RESPONSIBLE INVESTMENT IN AGRICULTURE AND FOOD SYSTEMS: CHALLENGES, OPPORTUNITIES AND LESSONS LEARNED FROM SIX AFRICAN COUNTRIES](http://www.fao.org/3/ca2877en/ca2877en.pdf)

[FAO: CHALLENGES AND OPPORTUNITIES IN A GLOBAL WORLD](http://www.fao.org/3/ca4305en/ca4305en.pdf)

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The specific commitments made by countries under the Agreement on Agriculture have an impact on the range of policies they can take in the future.

From the point of view of countries, it is important to identify provisions that increase their flexibility in implementing food security policies, limit their options and may require some adjustments in the future.

There are three main areas of domestic policy: production, consumption, and market stability.

It will therefore be dealt with here in the context of food security.

Production policy options: Each country has two options to support domestic production as part of its food security strategy:

• Border measures: through tariffs as long as they are within the limits imposed on the WTO.

• Domestic support measures: that is to provide price and non-price subsidies to farmers, but also within the limits of WTO commitments.

First: Support Policies:

1. Support through tariffs:

Tariff tariffs on basic foodstuffs in many countries are high. Although the option to apply the tariff within bound levels is consistent with WTO commitments, this policy may have shortcomings in practice, since most of them are food-importing countries. The rise in tariffs does not only mean higher prices for local producers but also higher prices paid by local consumers, an option that may not be practical for many countries with large numbers of poor households. However, there are some possible ways out of this dilemma, namely, that customs duties collected from tariffs can be channeled to food-insecure households while allowing producers to benefit from higher domestic prices. However, this option requires good management capacity to identify families in need of support (thereby reducing support leaks to able families) as well as having the necessary infrastructure to effectively carry out the transfer of resources to needy families.

2. Support from a food security perspective:

Food support is a tool for food security, and all countries have a range of options in terms of providing domestic support to agricultural producers. These options are policies that distort production by providing commodity and non-commodity support. Includes:

• Commodity subsidies: The state purchases products at guaranteed prices that exceed the level of the price of the tie.

• Non-commodity support: includes subsidies in the form of credit facilities, as well as support for inputs such as fertilizers, irrigation, seeds, etc., which are intended to reduce the cost of production but are not specifically directed towards specific crops.

The second: Options for price stabilization policies:

There are many factors that affect market stability, and the degree of market instability may increase in the short term at least, until markets adjust to the new global economic order. However, there are many WTO-compliant measures that countries can use to mitigate the impact of market instability on food security, including:

* Safeguards: The provisions of the Special Safeguards in the Agreement on Agriculture, as well as the WTO General Safeguards of Countries, allow additional tariffs to be imposed in special circumstances. However, since the SSG has been allocated to products subject to the tariff process, only a few countries are able to invoke this paragraph, because only a few of them have used the tariff formula to link their tariffs. Moreover, the use of such measures or remedies, including those applied on an interim basis, is subject to lengthy procedural requirements and, therefore, has not been of much practical benefit to developing countries.
* Tariffs: Countries may be able to apply the tariff system, which is inversely related to the level of import prices while maintaining the highest rate of tariffs at a level not exceeding the rate of bound fees. Countries whose tariffs are relatively high can compensate for differences in import prices by lowering tariffs when prices rise and tariff increases when prices fall. This can be achieved, in practice, through the "price range" policy, so that prices are adjusted only when import prices exceed the range between minimum prices and the ceiling of prices. An important point of such a plan is that if the price range is assumed to be too narrow, the global price signals do not completely eliminate the tariff change and local prices are allowed to move reasonably in line with global prices.
* Export ban: Another text of the Agreement on Agriculture, relating to the stability of domestic markets, deals with export prohibitions. At times when global prices rise sharply or demand rises sharply from a neighboring country, Article 12 of the Agreement on Agriculture allows for restrictions on exports, provided that food security of other (importing) countries is taken into account. Countries can consider using risk management tools that reduce the impact of price changes. Market-based instruments, such as futures and option contracts, are fully compatible with the WTO system.

Third: Reconciling the objectives of producers and consumers:

It is known that the Agreement on Agriculture generally has a great deal of flexibility and that countries have at their disposal a range of options that allow them to pursue policies that support producers and consumers without violating their obligations under the WTO regime.

However, apart from these commitments, there is always a problem of how to reconcile the interests of producers and consumers in local agricultural policies and food security policies, where the ultimate goal is food security.

This requires, in most cases, prudent linking of tools compatible with the WTO system. In general, the price of liquidation in the domestic market is determined by the world market price plus a tariff within the ceiling level bound by the commitment.

For most importing countries, the tariffs applied in years where prices are normal are likely to be lower than their ceilings, with some differences from that level in years when world prices are low or high.

However, dependence on tariffs alone may not be a good tool for achieving all the objectives of national agricultural and food policies, hence additional complementary tools may be needed.

For example, prices already obtained by farmers can be maintained at a higher level than import-equivalent prices through WTO-compatible transfers, such as commodity and non-commodity subsidies (up to the AMS and minimum allowable limits), special treatment And Green Fund policies.

Similarly, if local market prices are too high for a segment of the population, target interventions can be implemented so that the actual prices paid by the target households can be maintained at the levels they bear.

The use of these targeted interventions as well as other public income transfers allows countries to apply consumption policies without adversely affecting production incentives.

While it is clear that all these other functions of agriculture are desirable, achieving food security is the main function of agriculture for most Arab countries.

Countries can work towards achieving their food security goals under (Agriculture Agreement) and without resorting to the broad concept of multiple functions. It is necessary to define the provisions of the Agreement on Agriculture that need to be strengthened in the continuation of the reform process, in other words allowing Arab countries more flexibility to implement food security policies.

The following are some of the proposals on important food security issues within the three areas of concern for the Agreement on Agriculture: market access, domestic support and export support.

• Market Access: The remaining barriers to market access for countries' exports limit the ability of these countries to implement a self-reliant food security strategy by taking advantage of the benefits offered by international trade.

However, there are some problems, which are the prohibitive tariffs that lead to curbing trade transactions, the escalation of tariffs, and the large variation in tariff rates. In some cases, non-tariff measures prohibited by the Agreement on Agriculture (such as the minimum import price regime for some products) are still practiced.

These remaining barriers are a serious problem because they affect the key growth sectors of agricultural trade, specifically manufactured products and markets looking for high-quality products. Arab countries should recognize that tariff formulas apply to their tariffs, apply equally to tariffs in their main export markets and are subject to any provisions of special and differential treatment agreed upon. Possible outcomes in this area may include:

* Further reduce tariffs on export goods of interest to developing countries.
* Reduce tariff escalation and variation.
* Multilateral harmonization of rules to reduce compliance costs and avoid disguised protection.
* Develop principles to regulate tariff disparities within bound ceilings.
* Increasing market access for developing country exports.

• Safeguards: As some countries are net importers of foodstuffs whose markets are still severely distorted, SSG provisions may be of interest to these countries, particularly those that have committed to linking low tariffs. However, the enjoyment of the provisions of special safeguard measures is not general (both in terms of products or countries) and most developing countries cannot benefit from them because they have been linked to the tariff process. Possible outcomes in this area may include:

* Making special safeguard measures available to all countries and increasing the number of products they cover, on the grounds that this is a "public goods" issue that helps liberalize agricultural trade.
* Alternatively, allow the application of SSG to a limited number of food commodities (commodities that are highly sensitive from a food security point of view).

• Domestic support: Many countries have not calculated the AMS systematically, and they have argued that their level is zero, which may prevent them from implementing certain policies for future support.

There are also issues related to the definition of completed production when calculating the Calculate the support scale (AMS) and the AMS treatment and some real errors in the method used (eg base period, currency used in the calculation, etc.).

Within the Green Box category, some issues of interest to Arab countries relate to the definition of policies that meet the conditions of listing in the Green Box, in particular the meaning of the "minimum impact on production and trade".

Not all of the policies currently listed in the Green Box have no impact on trade and production.

More importantly, the Green Box does not include specific policies that are easy for countries to implement with limited management capabilities. Possible outcomes in this area may include the reclassification of excluded measures and the development of a special category of support addressing the legitimate interests of developing countries in the area of food security. Possible outcomes in this area may include:

* Allow countries to recalculate the AMS and review their schedules of commitments.
* If a review of the AMS is not possible, allow countries to raise the minimum allowable level and / or to make the minimum allowable for food commodities higher than for non-food crops.
* Give particular consideration to negative AMS cases for food security purposes (eg support for food production).
* Exception specifically for food security (ie food security stocks) expenditure from the AMS account / minimum allowable.
* Correcting / clarifying methodological problems (eg subsidized production, inflation, base currency).

• Export competition: Countries may also be drawn into food dependence through unfair trade practices of trading partners, such as dumping or over-export subsidies, which lead to the entry into the market of cheap food items that local producers cannot compete with.

Export competition is the most powerful commitment among the commitments under the Agriculture Agreement (AoA).

However, export subsidies remained high in a number of developed countries. There is a concern about evading enforcement of the rules, which reduces the ability of Arab countries to compete in the export market.

Possible outcomes in this area may include: o Introduce further substantial reductions in export subsidies.

* Strict measures to prevent the implementation of the rules.
* Develop other forms of export assistance, such as export credit facilities, and ensure export credit facilities, consistent with the general rules for export financial support.
* tightening provisions on export restrictions imposed by exporting countries;

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**First:** **the role of** **civil society and the** **private** **sector** **related to** **agriculture**:

The world has seen , especially in the last two decades of the last century, the growing interest in civil society and increase the number of civil society organizations , and there are many reasons that led to this increase, including: the inability of the state alone to fill the needs of the community and the spread of the democratic system , globalization and the collapse of the political systems of totalitarianism and the emergence of political and economic transformations, have become globalization imposes itself on everyone. It seemed sector, civil society organizations, play an active role in society and especially in the field of development.  
The study of economic and social contribution to the private sector studies concern. It is observed that most of the civil society organizations in general and agriculture in particular, suffer from some chronic problems, which are as follows:

1. Weaknesses and deficiencies of individuals belonging to such organizations in achieving an effective role , due to the inability of these individuals to deal with official organizations and the private sector and even with other civil society organizations .
2. The existence of deficiencies and severe weakness in financial resources.
3. Sees some individuals belonging to tack civil society organizations, that their incomes in those organizations is the only way the ideological front, and to achieve some personal gain , without having an active role in the revitalization and development of those civic organizations .
4. Emphasis on private sector participation and local government institutions, the role of these civic organizations, because they are carried out some of the policies and plans that opposes clearly and certainly the role of civil society organizations. The governmental institutions and the private sector to take from those organizations a tool to achieve some of the goals of its own policy.

The relationship between the role of civil society organizations working in rural areas and improve the quality of life of rural people is a positive relationship and therefore the acceleration of progress, and reduce poverty and the gap between rural and urban areas and reduce the gap underdevelopment which has become the most prominent features of rural society in developing countries , and activation of popular participation , as it should be that governments adopt alternative policies that will ensure that the civil rights and economic, social and cultural rights of citizens support the rights of citizens, economic, social and cultural development to reduce poverty and to ensure social security and the provision of services , social welfare, health and education and to ensure the right to security of land tenure and adequate housing . The emphasis on the role of civil society need to adopt development programs focused on rural areas.

**Recommendation:**

1. That the United Nations organizations and local government institutions and the private sector play an active role through activating the role of civil society organizations more efficient , by emphasizing that in all the discussions and deliberations of formal and informal .
2. That the focus of United Nations organizations to further training and activation of individuals belonging to civil society organizations to make them more effective, as well as the development of the art of negotiation for these individuals through their dealings with an organization, international institutions, the official and the local private sector, so that they can attract the attention, and encouragement to deal with civil society organizations civil. In order to deepen the partnership with international organizations on the basis of mutual respect and transparency, and not inconsistent with the independence of the civil organizations renewed roles adopted.
3. Has to be the establishment of a special fund to finance civil society organizations, provided that the financing of this fund local and international organizations and the private sector, in addition to some donors to serve civil society.
4. Emphasis on private sector participation and scientific research institutions and universities in partnership with the civil society organizations in order to develop the local community towards sustainability.
5. To achieve a quantum leap in the work of civil society organizations , to support anti-poverty projects , to encourage them to coordinate and work with other parties concerned with issues of poverty , and the distribution of roles among themselves , and take advantage of the potential and expertise of each other. And emphasize the importance of strategic planning for projects geared to combat poverty, and by focusing on one major goal.
6. Approaching destruction of one of the developmental issues and deal with them in an integrated way, through the achievement of the overall advancement of the families in poor communities is limited.
7. Build the capacity of civil society organizations in the projects , in a line parallel to the implementation of specific projects , and thus attach to each of the associations rehabilitation and capacity building on one side, and the implementation of projects rely on teamwork from the other side.
8. Building bridges between research centers and universities and by civil society organizations, on the other hand, with an emphasis on the importance of including the subject of university courses for civil work.
9. Development methodologies and studies civil society sector to become more effective in the detection of obstacles civil action, and propose practical ways to address them.

**Second, food security policies:**

FAO is considered one of the most international and local organizations active, which has an effective role and activist, and in the activation of certain policies, food security, through studies, research and food security projects in the world.

Where " Food security exists when all people at all times to access, both physical and economic adequate food, safe and nutritious food to meet dietary needs and food preferences Kate has an active and healthy life ."

Implicit in this definition is the recognition that food security is a multi -dimensional , and there have been many formulations of what the components of food security, for example , identified CFS four key dimensions or " pillars" : is to ensure the availability of , if not the production of sufficient quantities of materials food and ensures access to all the families and all individuals within those households have enough resources to get the proper foods (through the production , purchase, free ) . And ensure a nutritious diet.

Use when the human body is able to absorb and metabolize food. Diet nutritious and safe, biological and social environment adequate, and appropriate health care to avoid diseases help to make adequate food. Is to ensure stability is maintained when the three pillars of the other with the passage of time.

It has been noted by many experts on the need for a column on environmental sustainability, where patterns of production and consumption of food does not deplete natural resources or the ability of the agricultural system to provide enough food and supports many of the countries in the Middle East and North Africa to support the financial year, prices of basic consumer goods, which support was introduced at an earlier stage back until World War II, but he skipped several attempts to fix it , and since then has taken attributes benefits Permanent .

The targeted programs are rare. The range of financial support for food prices from a low of 0.04% in Lebanon and 1.3 % in Egypt, Morocco, and even 2.1% per cent in Syria. But the burdens of global support what is spent on supporting energy prices much higher for some countries: 10% in Yemen 0.9 % in Egypt, and about 5 % in Morocco.

By increasing financial support for food prices, and the imposition of price controls, and the reduction of exports, lowering import tariffs: for example , has been in Morocco lowering tariffs on wheat to about zero , and has also been paying financial support for importers, while allowing Egypt preferential import wheat from different countries . In some countries, such as Lebanon and Egypt, has increased wages and salaries to help consumers overcome the effects of rising prices.

The question now is: Does the rise in food prices to create some opportunities in the long term? Most of the poor are rural, and can rise in food prices when its continuation for years to help increase the income of the poor in rural areas and mobilize the economy.

The supply of food emotive issue, so countries in the region feel a real concern about food security. The rise in prices could help accelerate the increase of productivity and increase local agricultural production. However, the issue of water is scarce in some areas, which requires governments to take action to help increase the efficiency of water use as well. This means an increase crop yields by the unit of water.

An increase in domestic production to help protect countries from the vagaries and fluctuations in commodity markets. But countries in the region also will need to continue to rely on imports and on global markets in order to ensure the supply of food.

They should strengthen their capacity to use: futures markets, options, futures, and other modern tools in order to help meet the needs of food and hedge against the risk of the supply side.

Governments of developing countries better to encourage small-scale agriculture in the new global environment, and what form of special and differential treatment may be required to allow them to do so? "In many cases, the reforms have been achieved" successful "is not in isolation, but as a result of the implementation of policies associated with them.

In drawing lessons from the reforms that are seen benefiting groups of food insecurity, or which say the least , and you do not have disadvantaged them, so it is important to identify complementary policies that facilitated the process of adaptation to more productive activities , and any countervailing policies that act to mitigate losses transitional groups is safe and has only faced a clearer understanding of the effects that are often obscured from trade reform on food security is therefore vital if the drivers of further reform to lead to changes for the benefit of disadvantaged and vulnerable groups in poor countries .

It is acknowledged that reforms in sectors other than agriculture, it could have implications far more important both in terms of poverty reduction, through changes in income levels, and food security. It must focus on the agricultural sector and the impact that could be trade reform in its ability to contribute to the improvement of food security in the context of broader structural changes that result from the reforms. This focus justified by explaining the multiple ways in which agriculture, which they can identify and promote national food security of households.

While any trade agreement that alters the balance between trade liberalization and the protection of the particular good or service in the economy, can affect the levels of food security, reform of the relevant agriculture is particularly important for the following reasons:

(1) Agriculture is one of the central contributors to food security in most developing countries; both through its direct contribution to the availability of food, and indirectly as the main engine of economic development and thus improve access to food.

(2) Agriculture is one of the sectors most heavily distorted in many countries, and it has, as a result, has received considerable attention in recent rounds of trade negotiations .

**Recommendation:**

1. Need to be food security policies more dynamic and not static, the increasing global variables such as climate change, and changes in dietary patterns, and human behaviors rapidly, in addition to changes in the compositions crop, which requires change, food security commodities.
2. Phase that they key issues in food security policies and sustainable development policies.
3. To be involved in civil society organizations and media awareness programs on food security issues in the various communities, in coordination with international institutions and local government and the private sector.
4. Attention to some other hubs in addition to the main axes of food security, such as :
   1. Coordination and integration with the institutions dealing with food security policies, whether domestic or international, and the involvement of civil society organizations.
   2. Emphasized that there should be an infrastructure in order to maintain a sustainable food security.
   3. Emphasis on tightening the control and inspection of markets by all means possible.
   4. The involvement of community members in the development of alternatives to the goods of food security in line with the changing desires of individuals.
   5. Controls critical to the operations of the various monopolies, and the reduction of high food prices, both in the case of goods imported or locally produced food.
   6. Giving civil society organizations and a strong role in the control of certain markets food security.
   7. Seize opportunities to achieve sustainable food security.
   8. Emphasize transparency in the implementation of various food securities.
   9. The fight against corruption in all images in the application of food security policies, in order to reduce the effects of poverty, hunger and disease.
5. Critical review of what is known from existing literature and other resources in order to facilitate better targeted research and analysis of developments in trade and food security at the national level.
6. To provide a conceptual framework for understanding how trade liberalization and economic reforms relevant could affect the national food security at household level.
7. Provide a practical framework for evaluating the results of previous policies, and to predict the outcome of future initiatives, at both the national and the food security of households.
8. Prevent unhealthy foods , or rationalization of consumption , or imposition tax them , or provide cash support for more nutritious foods , put laws regulating the work of the manufacturers, awareness to individuals about these foods .
9. Address the problem of food waste , which is now one of the problems most prevalent in the community , the depletion of natural resources scarce , and environmental costs and the serious economic and social , and there are many effective ways to reduce food waste , which can result in cost savings and environmental benefits in order to create sustainable food system .

**Third, production systems, green and sustainable:**

Still a lot of community organizations, they do not have a strong knowledge of sustainability.

In simpler terms, is the production of food and fiber , or other plant products using farming techniques that protect the environment, public health and human societies , and animal welfare. This type of agriculture enables us to produce food healthy without compromising the ability of future generations “to follow suit.

And the major benefits of sustainable agriculture: the preservation of the environment, the protection of public health, support communities vibrant, sustainable food in the future, the possibility of agricultural and animal production industry.

In spite of the growing international interest in the green economy, and negotiations between the Member States on this concept in the period leading up to Rio +20 and challenge. This is partly due to the lack of an internationally agreed definition global green economy, and the emergence of terms and concepts are interrelated but different in recent years ( such as green growth and development of low-carbon , sustainable economy, and the economy steady-state, etc.), the lack of clarity about what measures include policy green economy , and how they integrate with the priorities and objectives related to economic growth and poverty eradication , as well as a lack of experience in the design and implementation of national and review of the costs and benefits of green economy policies .

The philosophy of organic food production keeps on certain principles: biodiversity, ecological balance, sustainability and natural fertilization of plants, and natural pest management, and soil health. Since the farms vary in product and practice, and there is also a wide variety in how these principles can be applied. However, the production of organic food must meet certain characteristics:

* Do grown product which is used in the practice of balance with the natural environment, using methods and materials that reduce the negative impact on the environment. Committed to organic farms to replicate the ecology of the natural environment through the preservation of biodiversity and promote healthy soil and growing conditions.
* Are produced on land which had been free of chemical pesticides and toxic pollutants known and projected, and fertilizers for at least three years prior to certification, and synthetic fertilizers and pesticides are not used in production .
* Are planted on a rotational basis within the farm system. Crops are rotated from field to field, instead of planting the same crop in the same place year after year. Planted cover crops such as clover to add nutrients to the soil and prevent weeds.
* Organic meat, poultry and egg products come from farms that use organic feed, no hormones added management to promote growth act naturally.

**Recommendation:**

1. Must emphasize the development of the concept of sustainability have civil society organizations, through training and various seminars.
2. Merging practice in the design and implementation of national strategies for the green economy by both developed and developing countries in most regions, including Africa, Latin America, Asia Pacific and Europe countries. This emerging practice can help to provide some important ideas and clarity much needed on the types of policy measures the green economy, its scope with regard to the various sectors and national priorities, and institutional barriers, risks and costs of implementation.
3. Farms sustainable support local economies through the provision of job opportunities for members of the community and buy supplies from local businesses. Also require more workers sustainable farms and create more jobs, while you also do a better job of feeding people on smaller pieces of land from industrial plantations.
4. Despite the fact that agricultural subsidies defective part, but the vital system of government support for farmers present. Where agriculture is that unlike most other businesses, because it is costing the farm on an annual basis to borrow money to cover operating costs, with the hope that their crop generates profits covers borrowing costs high for most farmers. This is because of the weather, and the spread of pests, financial speculation, and agriculture is also highly volatile business.
5. Farmers' markets and food cooperatives, and community supported agriculture programs continue to grow in popularity, making the local cuisine in a sustainable manner that produces more available. These programs offer consumers a chance to put their dollars directly into the pockets of farmers, cutting out middlemen and cooperation and strengthening regional food system.
6. Increase sustainable food production from consumers concerned, to take responsible choices. By purchasing sustainable foods from local farms or groceries shops, leads to support the farmers who raise food responsibly and actively encourage the growth of a more sustainable diet. Instead of giving money to the industrial sector, agriculture, and give it to sustainable farms. And buy food directly in farmers' markets.

**Fourth, rural women:**

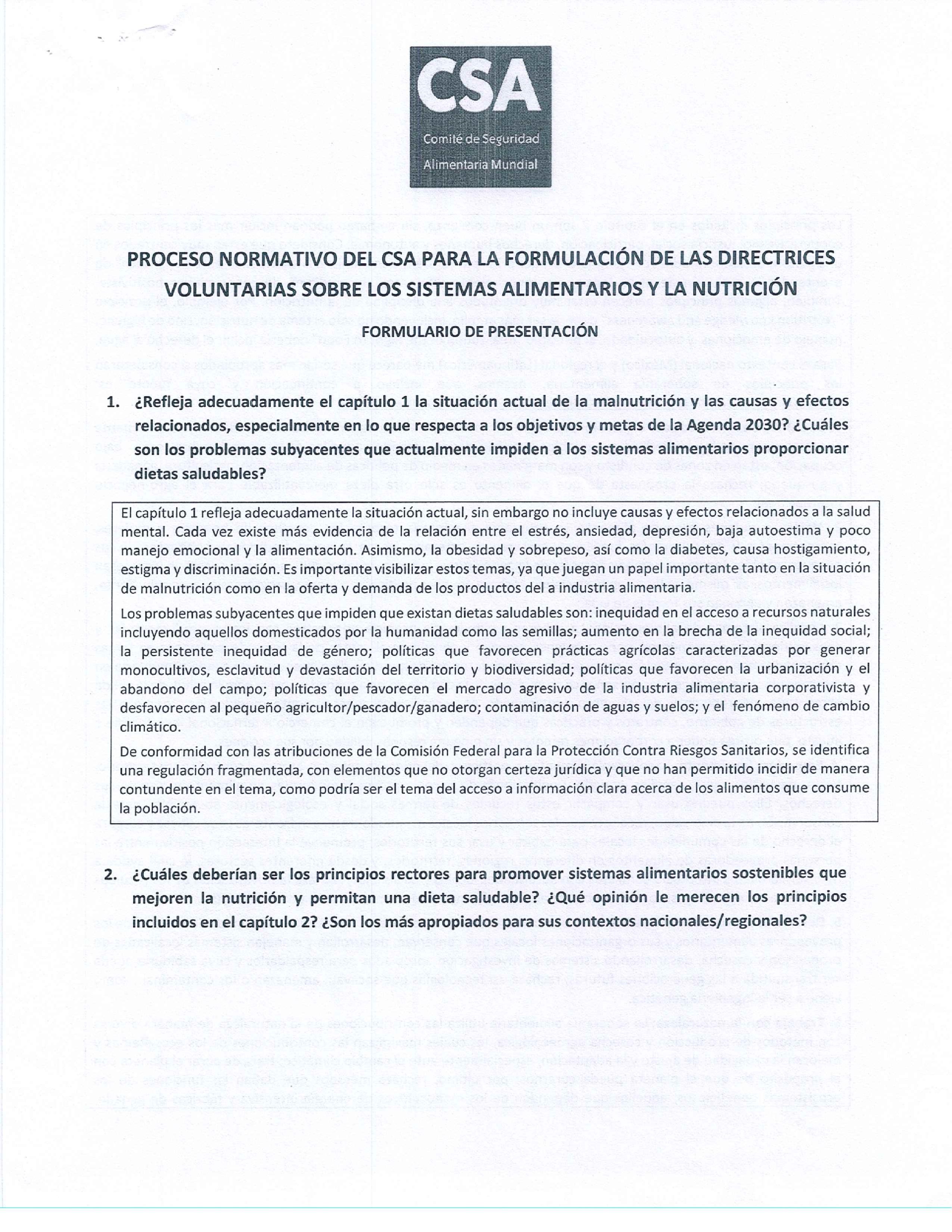
Through many different studies and research shows that rural women are less likely than urban women, due to lack of education and lack of potential for them to opportunities such as urban women. Although rural women have an active role prominent and active in rural areas, making it more active than urban women, especially in developing and poor countries.

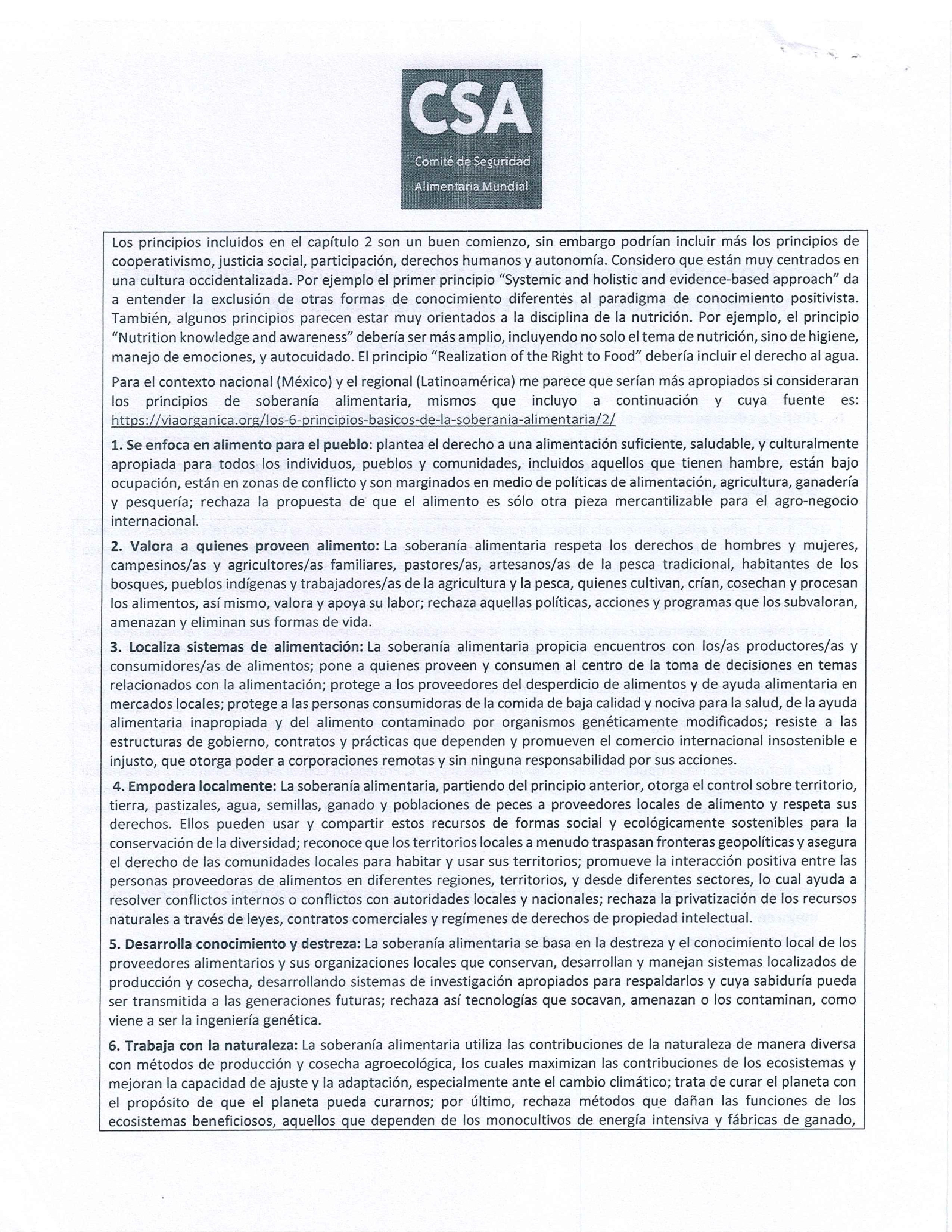
Recommendation:

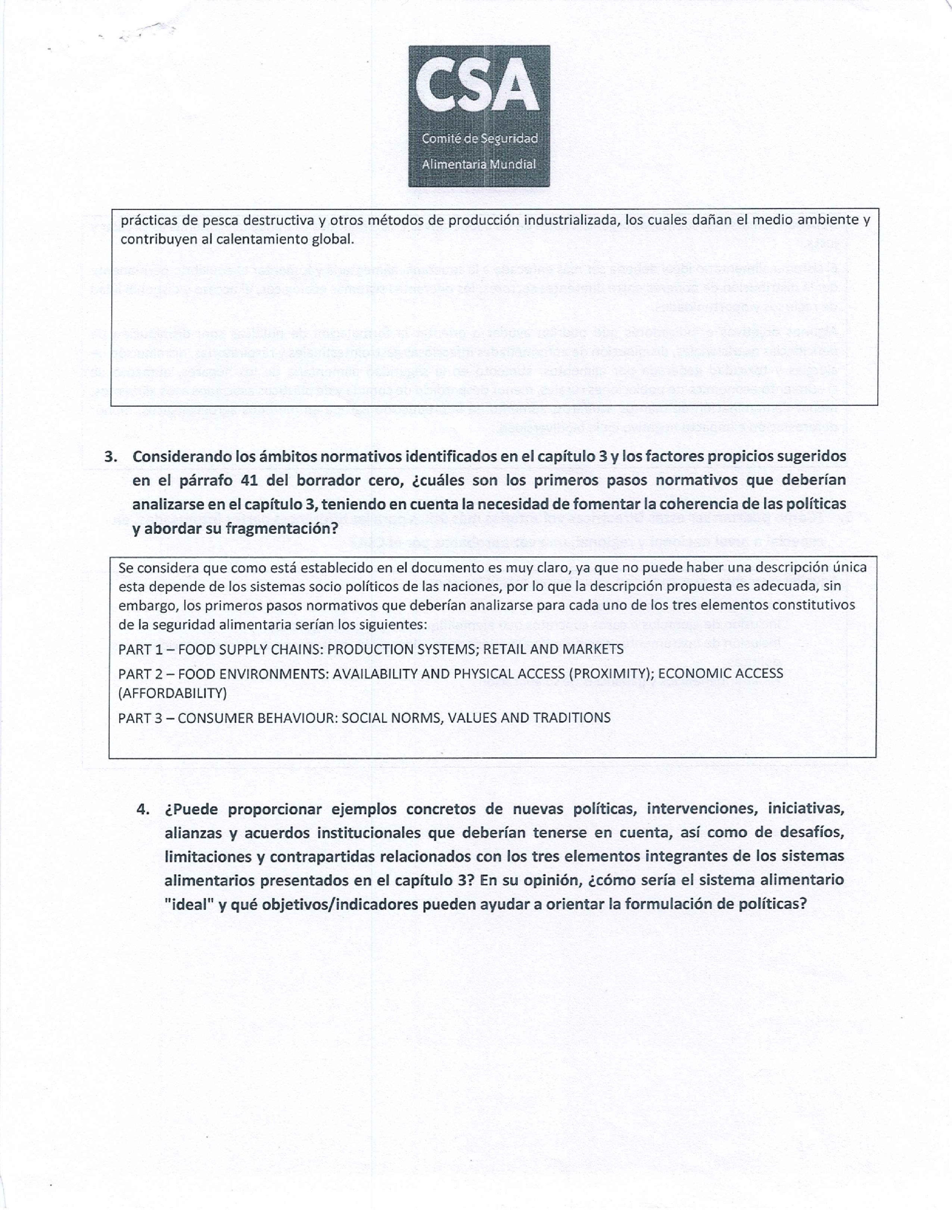
1. To emphasize the growing rural women, through glances role, and it is not less effective for urban women.
2. Attention and focus on the key issues faced by the rural women, such as women -headed households, and women's health, education, and activate the role of development in rural areas, and the emphasis on the role of positive and effective in the development of society, and it is a tool of local food security and self.
3. Emphasis on further studies which aim to detect the activity of women in the organizations of civil society rural private, and in the civil society organizations in general, is part of the struggle and the struggle of women to participate in the development of their communities, and for the define of the rights of the other side.
4. Role in the formulation of the social movements of women in many countries, where it was parallel channels to influence the policy-making process and decision-making.

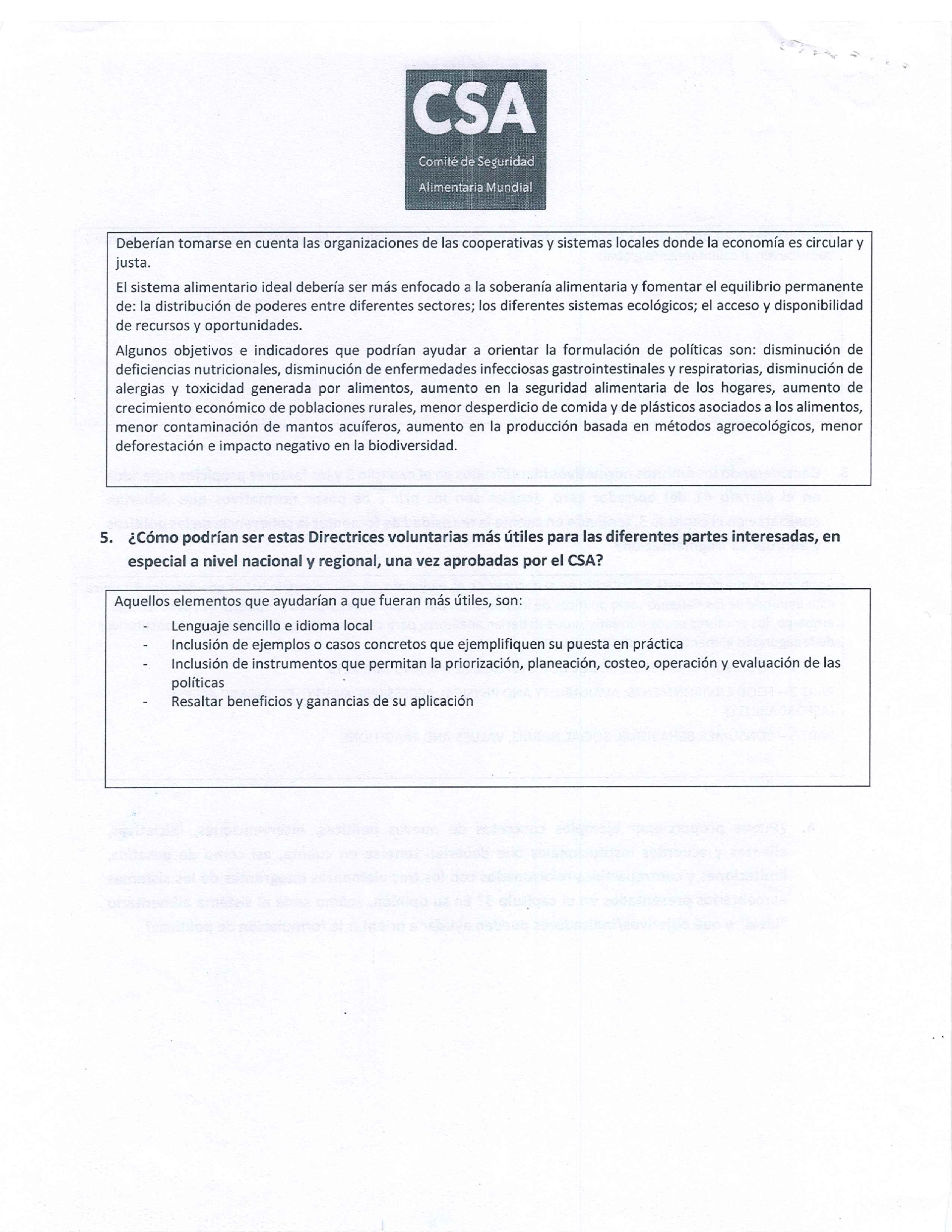
## Mexico

Anexo se remiten las respuestas de México al “Formulario de Presentación”, con el fin de contribuir al proceso de elaboración de las Directrices Voluntarias del CSA sobre los sistemas alimentarios y la nutrición.









## Patrick Mink, Co-leadership of the 10YFP Sustainable Food Systems Programme, Switzerland

Dear colleagues,

Thank you very much for this opportunity to provide feedback and input for the development of these important Voluntary Guidelines. Please find attached the joint contribution of the One Planet (10YFP) Sustainable Food Systems Programme's co-leadership.

Best regards,

Patrick Mink

**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?**

Chapter 1 does mainly focus on nutrition and on fighting all forms of malnutrition. This perspective is too narrow and does not fully reflect the title of the Guidelines, i.e. the systemic perspective on food systems and nutrition is missing. Concretely, chapter 1 does not sufficiently consider the conditions under which food is produced, processed, distributed and/or prepared, nor how food systems can be made more sustainable in order to ensure healthy and *sustainable* diets (see paragraph below). Nutrition must not only be healthy for people, but also for the planet. In order to achieve this, food must be produced, processed, distributed and/or prepared in a sustainable way (taking into account all three dimensions of sustainable development).

Chapter 1 clearly lacks such a food systems perspective and fails to consider sustainability in all its three dimensions in line with the 2030 Agenda. Sustainable food systems are at the heart of improving nutrition, enabling healthy diets and fighting all forms of malnutrition. However this is only one side of the coin and failing to acknowledge interrelated challenges will greatly difficult achieving positive impact on the nutrition front. The state of biodiversity and its implications for food and agriculture, the progressively degraded status of our soils, freshwater scarcity trends, and the ever faster changing climate are inherently interlinked with each other as well as with our hunger and malnutrition challenges.. Issues such as climate change or inequality cannot be regarded as phenomena that exist alongside the priority goal of food and nutrition security, ignoring the interdependencies. In this sense, addressing human health through better, healthier diets must necessarily take into account the need for diets to revert the negative impacts on the planet, bending the curve towards a trend of improved planetary health.

Therefore, wherever the term “healthy diets” has been used in the Zero Draft, we ask the Secretariat to include the following words in cursive: “healthy *and sustainable* diets”. This ensures conceptually connecting healthy diets to sustainable food production and sustainable food systems. To underline this indispensable linkage, we suggest using the term “sustainable diets” which is currently defined according to an international FAO Symposium (2010) as follows: “Sustainable Diets are those diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources.”

In Paragraph 6, reference is made to the “immediate and underlying causes” of malnutrition, listing tfor instance “the lack of stable access to healthy and safe diets and safe drinking water, inadequate infant and young child caring and feeding practices, poor sanitation and hygiene, insufficient access to education and health services, income poverty and low socio-economic status”. This statement while true, fails to acknowledge the role of inequality as an underlying cause of malnutrition, particularly at a time when inequality is increasing in countries where hunger is on the rise as stated in the 2019 State of Food Security and Nutrition in the World (SOFI) report. It’s embodiment into Sustainable Development Goal 10 (SDG 10) reflects the growing global consensus that inequality must be reduced in order to achieve sustainable development. Measures to reduce inequality have great potential to reduce poverty, food security and malnutrition. Last, inequality should be taken into account in the development of the coherent, cross-sector policies that the Zero Draft rightfully advocates for throughout its paragraphs.

In Paragraph 9, reference is made to “producers’ decision and consumers’ choices”. The perspective adopted should be more systemic, and include further key responsibility-bearing actors along and beyond the food value chain(s) and other sub-systems, such as those involved in processing, distribution and preparation activities, as well as for instance, the important role of the education system.

In Paragraph 12, reference is made to “policies (…) to be coordinated across sectors”. The environment sector seems to be missing among the mentioned sectors, and it would be good to include it specifically. Furthermore, it is important to specify that such cross-sectorial “food” policies be jointly developed and implemented simultaneously across different ministries, in a whole-of-government perspective, and with the inclusive involvement of all relevant actors from different stakeholder groups. Policy coherence can only be achieved through a holistic lens and a collaborative approach to policy-making, including the effective involvement of those societal groups that are most vulnerable to the negative impacts of our food systems.

In Paragraph 15, we clearly miss a reference to food systems. To the same extent as a variety of organizations from different sectors are addressing malnutrition, also food systems have received increased attention in recent years from the global community, including the United Nations and its Member States. We therefore ask to refer to “Nutrition *and Food Systems* have received increased attention” and to make reference to several resolutions, recommendations and programmes dealing with food systems, among other the FAO COAG 2018 recommendations (Link: <http://www.fao.org/3/my349en/my349en.pdf>) that explicitly refer to cooperation with the CFS, as well as the HLPF Ministerial Declaration 2018 (para 26, link: <https://www.un.org/ga/search/view_doc.asp?symbol=E/HLS/2018/1&Lang=E>), the UNGA-73 resolution “Global health and foreign policy: a healthier world through better nutrition” (para 3, link: https://undocs.org/en/A/RES/73/132 ) and the UNEA-4 Ministerial Declaration 2019 (para 5d, link: <http://wedocs.unep.org/bitstream/handle/20.500.11822/28463/K1901029.pdf?sequence=6&isAllowed=y>).

In Paragraph 16, referring to promoting policy coherence, we would like to see a reference to the One Planet (10YFP) Sustainable Food Systems (SFS) Programme included. The SFS Programme is a global multi-stakeholder initiative that promotes policy coherence in the field of sustainable food systems, and thus including nutrition. Through the 10YFP – which has a Rio+20 mandate and has been recognized as an implementing mechanism for SDG12 (Sustainable Consumption and Production), the SFS Programme reports on a yearly based to the High-level Political Forum on Sustainable Development. The topic of healthy and sustainable diets is of high importance and relevance in the SFS Programme; it is one of its five cross-cutting focus themes, which guide the Programme towards the achievement of its goal. The SFS Programme promotes an approach that supports diets that are healthy and that fully consider the socio-economic and environmental outcomes of food consumption.

We suggest to include in Paragraph 17 (at the very end of the sentence) “from a food systems perspective” in order to establish the crucial link between sustainable food production and healthy diets. The same accounts for paragraph 18 where we would like to see a reference to the promotion of *sustainable* food systems, as well as a reference to limited availability of resources. The words “respecting planetary boundaries” could be used in this regard.

Paragraph 20 reflects the complexity inherent in food systems, which is an elementary building block to everything we are trying to achieve with these guidelines. We therefore particularly welcome this paragraph. Nevertheless, the mentioned complexity is not reflected in any of the preceding paragraphs 1-19. This paragraph 20 illustrates why it is indispensable that food systems and their influence on healthy nutrition need to be more strongly reflected in the Zero Draft.

Paragraph 21 states that “[s]ustainable food systems that promote healthy diets are integrally connected to trade and investment, climate change, […]”, among others. The Paragraph then issues a recommendation to different actors dealing with the different normative intergovernmental processes to refer to and build upon each other’s resolutions and declarations. This is a missed opportunity to call for greater action beyond sectoral resolutions and declarations - without this implying a discredit to the value and merit of the mentioned instruments. Actors involved in different intergovernmental processes should be encouraged to collaborate on the challenge of unsustainable food systems given its primary role in climate change, food security, nutrition, and biodiversity crises as indicated by the IPCC, SOFI and IPBES reports. Actors should be invited to move beyond business as usual proceedings, and instead seek to escalate action across intergovernmental processes by, for instance, jointly developing innovative instruments such as a new deal or legal framework for people and nature.

In Paragraph 24, while we respect the categories identified by the HLPE, we again feel that within the category “c) political and economic” inequality has been omitted in favor of other lower tier drivers that can be regarded as composite factors of a higher level driver (i.e such as inequality).

In regard to Paragraph 25, we would like to draw your attention to the Collaborative Framework for Food Systems Transformation that was recently launched by the One Planet (10YFP) Sustainable Food Systems (SFS) Programme (Link: https://www.oneplanetnetwork.org/sites/default/files/un-e\_collaborative\_framework\_for\_food\_systems\_transformation\_final.pdf). We would like to invite the CFS-Secretariat to takee a look at the framework as we believe it may be a relevant source for the VG.

**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 CFS Voluntary Guidelines on Food Systems and Nutrition will only add value if they systematically address the nexus issues between food security, nutrition and sustainable food production, as well as food processing, distribution and preparation, along the entire value chain. By linking these issues, the Voluntary Guidelines will open pathways to more sustainable diets that are healthy for both human beings and the planet.

The key concepts concerning food systems and nutrition in chapter 2 therefore miss a definition of sustainable diets. With the FAO (2010) definition, we have a scientific basis and an excellent working definition that covers the three sustainability dimensions and health, and which was also used in the HLPE 2017 report on Nutrition and Food Systems (p. 34, link: http://www.fao.org/3/a-i7846e.pdf).

In Paragraph 36, the “guiding principles” must clearly apply the systemic approach to the entire food systems and not uniquely on nutrition. Under c), processing, distribution and preparation activities must be considered. Under f), sustainable food systems must be not only “equitable, accessible, resilient and diverse”, but also *inclusive*. Under g), consumer education in relation to food should be highlighted as a key principles / measure, and not only nutrition-education.

**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?**

If policymakers and other stakeholders are to be successful in tackling emerging challenges regarding food security and nutrition for all, while at the same time ensuring sustainable natural resource use, they will need to expand their focus to include the full scope of food systems.

The food and agriculture sector consists of a complex web of activities, outcomes, and drivers. Food systems incorporate not only the activities of producing, trading, transforming and consuming food, but also the social norms and cultures (for instance, dietary preferences) in which those activities are embedded, as well as the environment and natural resources which they depend upon to function (land, water, biodiversity). Moreover, food systems include people who depend on the food to live and also additional actors who influence the food sector both indirectly and directly (producers, retailers, governments, health officers, teachers, etc.). Different types of institutions, regulations, subsidies, and laws also influence everyday performance and outcomes of food systems. Stakeholders with more economic resources can accumulate more power to express their voice, while those with less economic resources not only tend to lack channels to voice their views but often also are more vulnerable tp the food systems negative impacts. This power imbalance should be acknowledged and dealt with, e.g. as a policy area or entry point in the Voluntary Guidelines. Outcomes can have both positive and negative impacts on socioeconomic conditions (e.g., smallholder farmers’ socioeconomic situation, poverty, employment generation, and income, etc.), the environment (e.g., forest conservation / degradation, more / less pollution, etc.), and food security and nutrition (e.g., healthy food and diets, access to food, food prices, etc.). Food systems present a “feedback loop mechanism”, where activities and outcomes result in processes that feed back to the environmental and socioeconomic drivers.

A sustainable food systems approach considers food systems in their entirety, taking into account the interconnections and trade-offs among the different elements of food systems, as well as their diverse actors, activities, drivers, and outcomes. It seeks to simultaneously optimize societal outcomes across environmental, social (including health), and economic dimensions.

In the policymaking process, a food systems approach helps to identify and address trade-offs in policy options. For example, it can lead to the development of nutrition recommendations that — in addition to health aspects — take into account environmental, economic, and social sustainability dimensions. This also supports the introduction of holistic food policies to ensure the provision of sufficient nutritious, sustainable, culturally acceptable, desirable, and affordable food to consumers, while generating a decent income for producers and other value chain actors, as well as protecting natural resources.

In policy implementation, a food systems approach will ensure that holistic thinking persists, avoiding the return to one-dimensional responses. It will also foster continuous engagement and collaboration among food systems actors, without leaving behind those most affected by food insecurity. This develops adaptability and flexibility for responding to volatile and inherent uncertainties.

In February 2019, the [second global conference of the One Planet (10YFP) SFS Programme](https://www.oneplanetnetwork.org/sites/default/files/sfs_conference_call_to_action_v7feb2019.pdf) identified the following key entry points:

* Promote context-specific and holistic policies including **incentives and disincentives** for sustainable consumption and production (labeling, taxes, subsidies, etc.).
* Produce metrics and data, and establish **monitoring and evaluation mechanisms** to assess these policies.
* Leverage the potential of **public procurement** to accelerate the shift towards more sustainable food systems.
* Promote **behavioral change** and **consumer awareness** through **education** and hands-on learning; focusing on school-aged children and youth as key agents of change.
* Encourage a shift towards healthier and more sustainable **food environments** together with private sector including SMEs, informal market actors and farmers.
* Foster partnerships among food system actors, especially **public-private partnerships** for more coherent and targeted actions.
* Allocate existing sources of **finance and** mobilize additional (public and private) **investments** for food systems transformation, particularly at local level (de-risking through blended finance, more aligned investments and grants).

**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 policy-making?**

Food production and consumption has a failing performance in terms of food security, nutrition, health, but also equality, environmental protection, and climate change mitigation, posing a serious sustainability challenge as the planet’s population grows while consuming beyond planetary boundaries, compromising future generation’s wellbeing. Responses to the complex problem posed by securing humanity’s food are more likely to succeed if built on two pillars, as championed by the **One Planet (10YFP) Sustainable Food Systems (SFS) Programme**. The first pillar refers to the need to adopt a food systems approach, which enables identifying and addressing more holistic solutions. The second pillar proposes that multi-stakeholder, inclusive approaches are more likely to succeed, especially if they fulfill conditions for collective action, if they overcome polarization by embracing the inherent conflict in a locked-in system, and if they adopt a mindset that focuses on innovation. The SFS Programme has been built on both pillars, adopting five focus themes and organizing its work across four areas.

One initiative developed within the SFS Programme’s multi-stakeholder platform, and which is considered highly relevant to the Zero Draft Voluntary Guidelines on Food Systems and Nutrition, is the [**Collaborative Framework for Food Systems Transformation**](https://www.oneplanetnetwork.org/resource/collaborative-framework-food-systems-transformation-multi-stakeholder-pathway-sustainable). A guidance tool in itself, the Collaborative Framework for Food Systems Transformation explains how governments and other stakeholders, whether at national or local levels, can apply a food systems approach to policy-making and implementation. The publication suggests practical and easy-to-follow actions for the transformation of food systems through the analyses of food systems, expanding or reorienting existing activities, integrating policy interventions, and building effective food systems governance through the modification of institutional arrangements. The publication is enriched with eight case studies that provide insight into how the principles and actions discussed in the document have been partially implemented in practice. Beyond these case studies, this guidance tool for policy-makers has been inspired by recent examples of food systems transformation, such as the growing phenomenon of food policy councils, multi-actor deals such as the Milan Urban Food Policy Pact or national roundtable experiences led by actors in the SFS Programme.

Beyond the specific case of the Collaborative Framework, through its governance structure, the SFS Programme has launched a series of core initiatives that are being implemented by coalitions of organizations from diverse sectors, that are pooling their expertise and resources in order to leverage synergies and avoid effort duplication. They address key problems related to food systems and nutrition and link several elements from production to consumption. The core initiatives are inclusive, enabling faster learning through constant communication and overall coordination, becoming mutually reinforcing activities to accelerate the shift to sustainable food systems, in support of the implementation of the Agenda 2030. In this sense, core initiatives are projects that have become wider coalitions of partners, enabling a widening of their lens and of participants’ accountability.

Two such core initiatives seek to foster sustainable diets, namely the “[Sustainable diets in the context of sustainable food systems](https://www.oneplanetnetwork.org/initiative/sustainable-diets-context-sustainable-food-systems-core)”, which is led by FAO and UN Environment with the involvement of amongst others UNSCN, CIHEAM, IFOAM – Organics International and WWF, and the “[Sustainable and healthy gastronomy as a key driver for sustainable food systems](https://www.oneplanetnetwork.org/initiative/sustainable-and-healthy-gastronomy-key-driver-sustainable-food-systems-core)”, which is jointly led by the Ministry of Agriculture of Costa Rica, HIVOS and IFOAM.

So far these two core initiatives have several results, including: the organization of technical workshops on “[Sustainable diets in the context of Sustainable Food Systems](https://www.unscn.org/uploads/web/news/Agenda-Technical-Workshop-on-Sustainable-diets-in-the-context-of-sustainable-food-systems.pdf)” and “[Development of voluntary guidelines for the sustainability of the Mediterranean region](http://www.fao.org/3/a-i7557e.pdf)”; an FAO/WHO consultation of five papers on “sustainable and healthy diets” (to provide to countries guiding principles on food and dietary patterns, which take into consideration the ecological setting, socioeconomic and cultural factors, and the biological and physical environment in which a population lives, as well as the environmental footprint of producing, consuming and disposing of these foods); the elaboration of the “Food For Life” campaign – an international campaign on promoting sustainable consumption of food; in the framework of the National Plan on Sustainable and Healthy Gastronomy of Costa Rica, a training of chefs on healthy and sustainable gastronomy and the dissemination of the principles of healthy and sustainable gastronomy; and the elaboration of a [video on Healthy and Sustainable Gastronomy](https://www.youtube.com/embed/cBGREhci_SQ) as a key driver for sustainable food systems.

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

The Voluntary Guidelines would be most useful to multiple stakeholders, with an emphasis on policy-makers, if they are designed in a way that conveys the fundamental concepts linked to the need for a systems-based lens as well as the key practical guidance elements (approaches, actions, checklists, etc.) in a very synthetic, clear, accessible way. A good example that might be referenced here is the Nordic Council of Ministers and its Nordic Food Policy Lab’s “policy guide” known as the “[Solutions Menu](http://norden.diva-portal.org/smash/record.jsf?pid=diva2%3A1214792&dswid=-1050)”, which also has an [abridged summary version](http://www.diva-portal.org/smash/record.jsf?pid=diva2%3A1266684&dswid=-6679). This policy guide has been directly divided into a guiding principles section and into a solutions section across five policy areas. More importantly, it builds on examples within the Nordic countries that have been rather successful in transforming issues in their food systems, including malnutrition.

To be most useful to different types of stakeholders, it would be good if on the one hand the guidelines could illustrate for each stakeholder group how they can contribute to more sustainable and nutrition-sensitive food systems in their own area, and on the other hand outline the mechanisms and processes that are needed to allow the different stakeholders to collectively work towards more sustainable and nutrition-sensitive food systems.

They should be in line with other relevant international instruments and commitments that require implementation at national and local level, including other CFS products (VG on Right to Food, VGGT, RAI principles), the 2030 Agenda on Sustainable Development, UNFCCC and Convention on Biological Diversity, among others.

## Ali Abdalrahman, Agriculture Research Center (ARC) ـ Agricultural Economics Research Institute (AERI) ـ Egyptian Ministry of Agriculture, Egypt

* Food security is closely linked to economic growth and social progress in developing countries.
* The food security agenda should focus on agriculture, which forms the basis of the livelihoods of many poor people and the backbone of rural economies in most developing countries and enable them to be successful food producers.
* There is a need to support small-scale adaptation to changes in food demand and the challenges posed by evolving technology and sustainability requirements.
* Small farmers need to improve market access, adapt and adopt appropriate technologies and institutional innovations and improve access to natural, financial, social and human capital.
* Food security is related to food availability, distribution, variety, and income.
* Priority of food availability in the face of increasing population requires increased productivity in agriculture around the world and reduction of pre- and post-harvest losses and food waste.
* The establishment of open markets and special projects that are critical to the development and are an important part of achieving food security objectives.
* Focus on sustainable entrepreneurship for local SMEs.
* Empowering small farmers to break the subsistence cycle and become small entrepreneurs.
* The vital contribution of farmers' organizations to make for the development of agriculture and rural communities.
* Unless small farmers are organized, they will remain politically powerless and economically disadvantaged.

## Lal Manavado, University of Oslo affiliate, Norway

Greetings!

Many thanks for giving me this oppertunity to offer a set of suggestions on how we may change various food systems in use today in order to ensure a sustainable supply of wholesome food the present and future generations. It is heartening to note that there is now a growing awareness that changing the current food systems is the key to dealing with all forms of malnutrition, hunger, NCD's, not to mention the great human misery they entail.

However, some crucial points still remain unnoticed or ignored; first we must understand the difference between a food system as a thing, and then a food system in actual use. Secondly, in all academic and/expert discussions, attention has been solely directed at physio-chemical aspects of food, i.e., energy it contains in Calories or Joules, and the ingredients contained in an 'idel' diet of universal applicability. I have disagreed with these two ideas on purely scientific grounds, and it has been included here.

I for one derive a certain pleasure from the taste, flavour, colour, texture, temperature, etc., of my food. Very often, eating is a pleasurable social/family occasion. I have collectively called tem dietary enjoyment. There is strong evidence to show that this is so in nearly all documented societies. Let us not turn nutrition into a sterile intake of fuel like putting petrol into a car, for dietary enjoyment is a valued part of the human heritage.

My policy suggestions arise from the distinction between a food system as a 'thing' and a food system as a 'thing in active use'. Then, it is clear that the form of a food system would have to conform to the purpose into which it would be put.

Is it used today to provide people a sustainable, varied, wholesome and balanced diet? Prevelance of obesity, deficiency diseases, NCD's, not to mention millions of the hungry speak either of a tool badly misused, incompetently used, ill designed, or any combination of those. Recall that food systems are not, I repeat not, a new invention. It was used by the precursors of our Stone-Age ancestors, otherwise, we would not have managed to evolve into H. sapiens sapiens.

These are very obvious things; unfortunately the current usage of food systems fails to appreciate it principal function, the goal we now strive to achieve. The sole justifiable function of a food system is to enable us to satisfy one of our fundamental needs viz., nutrition. Food systems have failed to serve this purpose adequately. If we should fail to take remedial action as soon as possible, one would be justified in wondering whether justice and fairness are also on the market.

Best wishes!

Lal Manavado.

**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?**

By and large it does; however, the draft does not pay adequate attention to its second vital component, viz., food security. It is obvious that unless food security does not obtain, adequate and wholesome nutrition is impossible.

Further, it is true that lack of proper nutrition (frank malnutrition or excessive intake of fats and carbohydrates i.e., unbalanced nutrition) cause the problems listed, it ignores another immediate need nutrition serves, i.e., supply of energy required for every physical and mentalactivity as well as growth and repair of tissues.

As it is common in most academic undertakings, it ignores another crucial function of food intake, viz., what I have called ‘dietary enjoyment’. We are not analogous with machines that could be fed on the ‘right fuel’ as prescribed by some organization. In most cultures eating is a social event where it is associated with enjoyment and appreciation. Hence, many a national cuisine man has developed over centuries.

It is difficult to understand what is meant by ‘social access’ to food; if it is to mean food that does not mean social disapprobation, for example human flesh, then it would have been better to say ‘food with reference to the relevant food culture.’

It is sad to note that I am not successful in persuading the drafters to be bold and use ‘available and affordable’ in stead of the weasel word ‘access’ to food. The logical soundness of my suggestion needs no elaboration.

True, a holistic approach to the problem needs to mention the other factors that impinge on global food security and adequate and wholesome nutrition But, some of of the items included here have no relevance to it, for example sanitation. I think here seems to be some confusion between the above topic and good health linked to nutrition. Yes, shortcomings in nutrition have all the health consequences listed here; but things like bad sanitation only exacerbates those consequences. Well, they have an indirect effect on food production and one’s ability to engage in gainful employment needed to procure food. But I think it would be wiser to leave out indirect influences on nutrition.

However, another vital point seems to be missing here, viz., what I have called public dietary competence. It embodies one’s knowledge of what is best for one to eat, where and how to procure and prepare it for comsumption, and the skill needed to use that knowledge. It is plain that unless one has this dietary competence, having the money and all the food nearby will not result in that person eating a wholesome balanced diet.

One of the real obstacles to youth eating healthy food is the lure of advertising, which is now a universal problem. Training in dietary competence is one of the ways to deal with this issue.

Point 9 is well put, I would have preferred to qualify ‘diet’ to ‘people’s diet’ to emphasise it as a concrete entity.

I have a certain about point 10, ‘evolving’ dietary needs… It would be better to drop ‘evolving’ here, for most of the evolving is done by ‘wheeze doctors’ in advertising or by groups who have a pet project to promote. A really people inspired evolution in dietary habits ought to be left to the people by encouraging their own food culture which is often the most benign to the local environment.

In point 12, let us demonstrate our awareness of reality by emphasizing policy changes first and foremost in trade both national and international. Let us recall that even the real food producers/harvesters have to trade in food to meet their needs while most of us have to buy food. An understanding of what may legitimately (not legally, but knowable to a human being) constitutes a food system, would make it clear that every sub-system constituting it has been commercialized. So, trade policy revision as it applies to food is the crux.

**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?**

Point 19 should be revised in line with the above concerning point 12.

Pity point 21 had to wait so long, do give it a few more teeth and bring it up.

Point 24 makes one wonder aloud; changes in Biophysical environment like qualitative and quantitative degradation in

Biodiversity together with unsupportable increase in the population of one or more species (including human) are directly responsible for a significant reduction in ecosystems services which embraces a salubrious climate, i.e. the opposite of global warming. Therefore, the emphasis should be on the cause, i.e. biodegradation and overpopulation by one or more species, and not on the consequence. Unless we deal with the cause, no effective remedial policies are possible. Human over population should be clearly identified as a problem, which exacerbates the maternal and infant ill health owing to the financial distress it entails the lower middle class and the poor. Why are we afraid to mention family planning instead of burying it in non-words like ‘demographic changes’? Black death also brought about one! Let us not resort to inanities.

24. B. This point is the least important except infra-structure. Technology and innovation per se has no influence until they are in actual use. This use has to be sanctioned by policies concerned with their use. Recommend their reduction in rank if not discharge from service.

24. C. Too mixed up; I would suggest, this point as 24B and revised as follows: Appropriate policies in trade, agriculture, communications (infrastructure), education, health and security, political will and leadership, enhancement of the competence of those who design and implement such policies, etc. Please, please drop the catch word ‘globalisation’, for it only requires a passing knowledge of world history to understand that it has been there since the Roman times if not fearlier. Recall the ‘silk routes’ that ramifyed throuout Asia, Europe, Africa, not to mention the Chinese silks and jewellery found from Viking graves etc. Let us not present an old hat as something new just because its magnitude has increased. Food rationing that lasted for more than a decade in the UK after the WWII shows the extent to which trade was globalised more than 70 years ago! It is governed by the economic and trade policies, thus a consequence. To bring about fair trade, we can’t talk about ‘globalisation’ but should strive to revise the causal policies.

Really, volatility etc. These are just consequences of trade practices allowed by trade policies. Conflicts and their attendant human miseries are a problem of security that affects every thing, hence, my inclusion of it above. Speculation in commodity futures have often lead to ‘artificial shortages and high prices of staples like wheat and rice. I am unhappy no ‘research’ has included this problem. Natural catastrophes can have even more drasticnutritional consequences, not to mention man-made ones like the nuclear accident in Fukishima (forgive my dubious spelling) in Japan,radio activity from which was detected in lamb in the Danube basin just a few years ago. Environmental regeneration can often reduce or prevent some natural disasters.

24D and E are very difficult to grasp. On the on hand, you have UN resolution on right to culture which I fully endorse, and on the other, we point finger at culture as a problem. When a thesis is self-contradictory, it cannot be a sound basis for a way forward. Why not drop both, and concentrate on good policies and their competent implementation?

Point 25 underlines a major problem. Let me put it in a nutshell. Country involved is Uganda, where government has scarce financial resources and know-how. Number of youth who do not go to school and are unemployed is high. ILO agreements on youth employment banns their ‘official employment’. So government is helpless and children particularly in the age group 15-17 are exploited by private ‘entepreneuers’ who employ them for symbolic wages under dangerous working conditions!y not make the international agreements realistic so that something can be done now for youth who cannot or will not procure a formal education? Their numbers are greater than the statistics would suggest.

We cannot expect good nutrition when free trade agreements permit manufacture, promotion and the sale of demonstrably unhealthy ‘foods’ and beverages especially to youth. This has become a growing problem in in non-affluent countries.

Point 27 carries a category error, viz., failure to distinguish between two elementary notions, system and its use. Of course, system left on its own would serve no purpose, but people are needed to design, build and put it to work. Naturally, it may display faulty design, incompetent use, misuse, over use, etc. This point is rather important if the policies influencing a food system are to be effective.

Point 28 is brief and cogent. Excellent.

Point 29 should be deleted, for a food system in use is no more a chain than any large organissation with several departments working in harmony to achieve one big objective. This phrase is not only meaningless and logically flawed, it only leads to confusion. Those named items are merely the sub-systems of a food system, which are in use elsewhere as well, eg., transport of missiles to destroy an enemy of reason.

Point 30, why the pleural environments? This is not common English usage.

Point 34 is strange to say the least. Consider the obvious please, after air and water, food is the most essential thing we need to live, afterwards we can discuss. So, the primary purpose of a food system in use is to enable everyone to obtain a wholesome balanced diet in a sustainable and a fair way. True it has been commercialised

for a long time. But that does not change its main purpose, could we please break out of the economy silo for once? Do we build houses to provide money for builders, or do we wear clothes in winter to enrich fashion designers? No? Well, why then food, the third most essential thing for life on earth?

What they offer seems to be reasonable, but would have been better if it is said that those are done in a sustainable and a fair way.

35 is ok.

36A isrepetitive, while a systemic approach is necessary, it is not, logically not a sufficient condition for attaining the objectives it is intended to achieve. The tool may be perfect, but unless it is used appropriately and skillfully, it does not do any good.

36B fails to see that unsuitable policies can be quite coherent. What is needed here are appropriate policies that display intra- and inter-policy harmony with reference to the overall aims of the authorities. I affirm that the ambiguous term investment ought to be avoided lest the whole endeavour become a commercial venture.

36Cshould be the point A.

36E Revise it to read ‘nutrition and dietary knowledge and skills, because you may know exactly how to ride a bike, but unless you acquire the skill to ride, you can’t do much with the machine.

36G is a little unclear, for it is concerned with policy implementation. These actions are strategies that may be used in policy implementation. It is important to distinguish between policy and strategies used in its implementation.

**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?**

Points 37 and 38 are curious indeed. It is difficult to understand what justification one could provide for maintaining that food systems are constituted by those three pieces, ‘supply chains’, ‘food enviroment’ and ‘consumer behaviour’. Recall that food systems have existed before man emerged, and since then from the stone age. It is very unfortunate that an objective analysis of human food system has been so thouroughly ignored even though it is available. Commercialisation of every sub-system constitutive of it, does not mean it has a ‘supply chain’ or any other such object in it. This notion is not only unsound, it is unjustifiable.

Point 39 does not seem to grasp the distinction between policy distribution which is necessary and fragmentation that could occur only within a specific policy domain. It is therefore one needs policy harmony within and among policies.

**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 policy-making?**

It is necessary to take up the last past of the question first in order to give a satisfactory answer to this question. Ideal or not, a human food system today has the following set of sub-systems. Their emergence and evolution, I have described elsewhere. They are yielder (environment, farms, dairies, etc), harvesting, transport, preserving (drying, salting, freezing, semi-processed like cheese, etc), preparation (cleaning, and cooking) and the last to emerge, selling sub-system. All the previous sub-systems have been in use in harness for a long time before the advent of the selling system. Confined to ‘raw food’ previously, mainly grain, it then entered into commercializing the preparation sub-system, and this now is more or less complete. But, this does not alter the fact the human food system cannot be seen as just a matter of trade. In addition to the above, there is also an adjunctive sub-system of supplementation, which is concerned with supplementing the ecosystems services on which agriculture depends. It has its own ‘research and development sub-system’ which need not concern us here at present.

This analysis enables one to identify in a logically coherent way, what policies will be needed to attain our objectives. Moreover, it accurately reflects the evolution of the human food system from the days of hunter/gatherer to modern agriculture.

First of all, education policies are needed to instruct and train those who are engaged in using each sub-system to use it in an appropriate way i.e., in an environmentally felicitous manner in line with the local food culture as much as possible. In yielder systems, these may include permaculture, reduction of areas devoted to monoculture, fishing quotas, net size controls, active measures to prevent soil pollution and salination, erosion, etc. It is crucial to promote the use of appropriate equipment and steps to ensure their availability and affordability.

Adequate supply of appropriate equipment is essential for satisfactory harvesting, which is often a problem in less affluent countries, which results in food loss in the field. The same is even more important for the storage sub-system as enormous quantities of food is lost to vermin and fungal contamination every year. These policy considerations apply with equal force whether they are commercialized, or not.

Strong measures are needed to stop intentional spoilage or dumping of food in order to keep up the prices. Sadly, this commercial action is still with us even though ‘media’ does not seem to show it the interest it deserves.

Food transport systems are often inadequate or inappropriate in most countries. It is a pity that in affluent countries, huge articulated lorries are so extensively used for this purpose while rail and water transport could achieve the same objective more cheaply and with greater environmental benefits. Strong policies to promote this objective are an urgent need everywhere.

Preserving system has grown extensively making it approximate preparation system in some cases. Here, our main concern is its use of additives whose long-term health effects are unknown. Further, trade in preserved items are also prone to be under trade monopolies that leave the end-user at their mercy.

Enhancement of domestic preparation system requires comprehensive measures to increase the dietary competence of the people. In implementing this policy, due attention should be paid to the local food culture. Moreover, active steps should be taken to discourage efforts to undermine this action or to promote unhealthy eating and drinking habits either by advertising or by ‘entertainment’.

Commercial preparation system manifests itself in two forms, places where it is served and selling it in forms that may be taken home and consumed after heating it up. I know this is a little simplified, but it would suffice for the time being. I will not comment on the places where standard cuisine of the country or the so-called ‘international cuisine’ is served except when they are run by chains. When the latter happens in a poor country where unemployment is high, it would be of greater human benefit if resources are made available to suitable families to open and run small restaurants serving reasonably-priced meals. This is not a theoretical notion, for in many such countries, international firms selling well-known items of dubious quality are establishing themselves.

Frozen prepared food has become an unhappy part of the daily lives of many in affluent countries, and it seems to be making inroads into the eating habits of the developing nations. Its health effects are by no means positive. Here, policies to promote and facilitate the establishment small family owned restaurants that could cater to the local people at a reasonable price would be a welcome social improvement.

Food waste in food serving establishments has two causes; excessively large/insipd portions, or country’s own regulations. It would be easy to reduce the individual portion size, but allowing the customer a refill if so desired. Insipid food arises from pre-made items heated up in a microwave over before serving. Here, the customers want ‘fast service’ leaving the cook no choice. Since this is a social problem, not much can be done to remedy it by policies.

Most countries require by law to throw away items like bread used to make hot dogs etc., 48 hours after they have been baked. So, they are thrown into the dust bins after that period. Here again, it arises from the impossibility of resolving the conflict between desired service speed and regulations.

Now we come to the all pervading selling system. Originally confined to raw food items like cereals, legumes and other edible seeds, it spread to preserved items like salted fish and meat, dairy products and then on to the other more sophisticated preserves like jams, jellies, cordials, and alcoholic beverages. Soon it included all the raw foods as well. Simultaneous with the expansion of selling system came the need for larger storage facilities and extensive transport.

Raison d’etre of a selling system is to provide an item or a service at a price commensurable with its value to the customer and a fair reward for the provider of this service. Had it been fair, it would have been praiseworthy activity. However, when the this exchange began to be used for maximizing the profits to the seller, problems for the customer began to arise.

This became exacerbated when each sub-system of a food system became highly commercialized. For instance, when sellers began to depend on commercial transport the end-user had to pay the food producer, transporter and the final seller, each requiring his share of expenses and profit. Here, a seller may even hire a storage facility whose cost and profit will have to be borne by the end-user whose nutrition and food security is not exactly enhanced by having to support so many intermediaries. It must be remembered that these intermediaries often employ other people and who have to be paid. True, this is a little simplified, but the perceptive reader will note its validity and will be able to expand it to fit the form of the food system he is trying to improve.

Sellers speculate on the value of some of the non-perishable food items in what is called commodity futures market. Products are bought cheaply from the poor producer for cash prior to harvesting, and sold at much higher price to other wholesale buyers. Effect of this on the affordability of essential cereals needs no elaboration.

Takeovers of food seller establishments to creat giant food companies is legal today. This has become the norm in affluent as well as many not so affluent countries. Thus a handful of food sellers can dictate to immense number of end-users what they can eat and at what price, making the notion of customer choice a travesty of choice.

Its effect on the food producers is equally disastrous, for when there are only a few buyers of their produce, it is what is humourously called a ‘buyer’s market’. Food is often perishable, besides, the modern producers do not have large storage facilities. So, they have to sell at the prices dixctated by ‘cooperating’ big buyers, and seldom receive a fair price. This is why in all affluent countries, food producers are paid an annual subsidy running into billions every year so that they could have a decent income. This subsidy indicates the exact amount of unfair profit sellers gain from food. So, the end result is that the end-user and the producer are unfairly treated by the sellers.

Some policy changes are needed to initiate fair trade in food while our primitive notion of profit and consumption driven economy catalysed by ‘competition requires an urgent revision. The conceptual change involved here is very much akin to getting the public to accept the Copernican notion of our solar system instead of the old Geocentric one. The only difference is that when it comes to the solar system, it is not critical, but a change in how we conceive of economy is vital to our survival.

Pragmatic trade policy changes would embrace a devolution of food trade everywhere. As unemployment rises everywhere, more labour-intensive approaches ought to be promoted. The distance between food producers and the end-users should be shortened as much s possible to ensure the freshness of food and to enhance the reward a producer may earn. Active policy measures should be taken to abolish monopolies in any part of a human food system be it national or international. It should be salutary for the liberals to recall the the former Soviet food system was a monopoly and its miserable performance is well documented. A private monopoly may be a bit more efficient, but not for the producer, the end-user, nor yet to our environment.

I have commented on trade policy now, because it has spread into every sub-system in a food system. Therefore, any change in our food systems towards their sustainability and capacity to offer varied, wholesome balanced diet to all is inseparable from a radical and positive simultaneous change in our trade policies, especially with relation to food production and sales. As long as commercialized food production and sales are driven by increase in profit by increased consumption regardless of the quality of what is eaten, neither our objective nor a reduction in NCD’s can be achieved. Further, it would become the greatest threat to our environment resulting in global warming, loss of arable soil due to pollution and salination, and erosion.

Let me now sketch the outline of a comprehensive policy framework. Our point of departure is the sustainability of food systems. Let us be realistic and accept two fundamental principles; first, we have no right whatsoever to deny the future generations the dietary enjoyment we may experience today, and secondly, no food system whatsoever will be able to provide it beyond a certain limit.

What is dietary enjoyment? It is the pleasure we all derive from eating, and even aminals have their preferred food. Over the centuries, most cultures have developed their own cuisine, and it is considered to be a valued social good. Indeed, some countries are proud of it. This is a point that ‘food researchers’ have ignored as though they have a right to prescribe what others should eat just because their ‘suggested novel food’ is said to contain the right amount of the necessary nutrients. It may be so for them, but most of us do not care to eat calories, vitamine and minerals. In nearly all civilized societies, meal times are also a social occasion.

No holistic approach to our problem can ignore the importance of dietary enjoyment especially when it is purported to uphold right to food. Surely, we are talking here about the food someone wants to eat, and usually, it is that which is determined by one’s own food culture while one is free to try food from other known food cultures. Novel foods do not have any place in this category.

So, let us see how one may change a food culture to be sustainable and provide varied, wholesome and balanced diets to people with reference to their food culture. Such a food supply should be physically available and affordable to all. Our first concern then, is sustainability.

Sustainability depends on the adequate availability of ecosystem services to riase crops and domestic animals as well as natural food supplies like fish, mollusks and crustaceans, etc. These services include a salubrious climate, sufficient supplies of water and mineral nutrient, soil porosity, freedom from toxic materials in soil and water, etc.

Adequate ecosystem services depends on the equilibrium between the available ecosystem services and their usage by the living things (plants and animals). This presumes that the living things do not salinate, poison or cause erosion of the soil.

That equilibrium depends on the equilibrium between the rate at which the living use up those services and the rate at which it is returned to the environment through predation, death and saprophytism. This second equilibrium depends on the endemic biodiversity that obtains in a given locale.

Biodiversity has two components; its qualitative aspect reflect the number of species endemic to an area, while its quantitative component indicates the population size of each individual species found there.

Hence, our second equilibrium depends on not only on the number of species in an area, but also their population size. Should one of these two fall or rise beyond a certain limit, a deprivation of ecosystem services would ensue. This is why in some African animal sanctuaries elephants are culled annually, so that maximum number of protected species including elephants themselves may survive.

Therefore, it is time any policy framework with holistic pretentions should include human family planning as an issue of overwhelming importance. Recall that we have no right to deprive the future generations the dietary enjoyment and choice we have today, and that ‘novel foods’ are no substitute for the ‘real thing’.

My argument thus far advocates just and fair trade policies that promote sustainability of food systems. However, most of us procure food by purchasing it. Hence, while just and fair trade policies would not be effective unless they are implemented simultaneously with appropriate i.e., realistic and sustainable employment policies. This dual approach is essential to ensure the affordability of food.

Policy outline:

This outline sketches a distributed and recursively implemented policy framework, i.e. even though it is given under sector headings, it is distributed among every other relevant sector to ensure its holistic nature. A detailed description of this approach may be found in my contributions to GSOP conferences on soil pollution (2018) and soil erosion (2019) which were held under the ægis of FAO.

Environmental policies:

1. Take legally enforced actions to cut down the emission of ‘green house gases’, compel the safe disposal of chemical and radio-active waste and proper treatment of sewage and domestic refuse.
2. Similar action to halt the loss of forest and re-plantation of endemic flora in the denuded areas. Plantation of such trees along roads, around public buildings and growing fruit and nut trees in home garden wherever it is possible.
3. Actively discourage draining of wet lands, destruction of mangroves, etc.
4. Compel the reclamation of derelict sites rather than removal of soil’s green cover especially in urban areas.
5. Promote research to develop roofing materials and outside wall paint whose heat exchange properties are similar to those of earth’s natural green cover. This would make a significant difference to the extremes of temperature one experiences in every heavily built up area as well as to the rate of global warming.
6. Promote research on prevention of soil erosion and reclaiming polluted/salinated soils and undertake effective action for their reclamation..

Trade policies:

1. Institute the devolution of trade and rigourously prevent the formation of trade monopolies.
2. Ensure fair trade practices; neither the actual producer of goods or the provider of services nor the end-user should be subject to an unfair exchange.
3. In spite of the rhetoric to the contrary, no ‘developed’ nation actually has a ‘totally free trade’ policy. Active steps should be taken to prevent the spread of harmful internationalization on the traditional lines to developing countries in the guise of re-location of industry to ‘provide employment ‘ or to develop their ‘industrial base’.
4. Manufacture and sale of ‘food’ and beverages foreign to a country should be strictly controlled and advertising them should be banned. Please note that billions of aerated drinks consumed each day releases many hundred tons of Carbon dioxide into the air, and this is easily preventable.
5. An overall devolution of economy is necessary to prevent the growing gap between the rish and the poor and to make it dimish.
6. Legally enforced limit to profit, be it by the individual or the so-called ‘legal entities’.

Education policies:

1. Appropriate public education to increase people’s dietary competence in line with local food culture and against ‘fashionable’ and pseudo-glamourous foreign ‘food’ and beverages which are injurious to health.
2. Appropriate dietary education in all schools and in institutions that train health personnel. It must be noted that no ‘balanced diet’ can ever be scientifically prescribed for anyone person, because one’s nutritional vary according to one’s physical stage of development, climate, actual need for nutrients at a given time, racial factors, etc. As a result one’s daily nutritional needs vary from day to day.
3. Establishment of sufficient number of agriculture schools and on-the-job training centres for rural youth where appropriate and environment friendly practices are taught.
4. Inculcating into the public and especially to the younger generation that it is wrong to strive for unlimited profit without paying any attention to its environmental consequences and the deprivation it causes to hard-working but less competent people. The former places everybody in danger while the other could easily result in a break down in law and order, for when one has nothing to loose, it is difficult to expect one to respect laws that does not do any good to one. Societies without ethical norms are doomed to decline and decay as human history amply proves.
5. Public and formal education that underlines the vital importance of the agricultural pursuits, for apart from air and water, food is the third most crucial thing to life and without it all glittering words become merely academic.

Agriculture policies:

1. Encourage and promote multi-culture and local food culture while depreciating monoculture.
2. Support research into non-salinating fertilizers, chemical-free pest and weed control, and introduce vigourously the successful methods in those areas.
3. Support people to reclaim polluted/eroded areas through planting appropriate plants, building dikes, harvesting rain, etc.
4. Lead efforts to retain rural youth in situ by establishing farm cooperatives and sales outlets for their produce and family-owned small restaurants etc. This may be done among fishermen and those engaged in aquaculture.
5. Active promotion of farm cooperatives and sales outlets everywhere so that farmers may earn a decent living while the end-users will have a source of affordable wholesome food.
6. When possible, distribute fruit tree saplings to home owners at a reasonable price.
7. Recalling the high unemployment rates and low standard of education that often obtain in ‘developing’ countries, support appropriate technology and labour-intensive agriculture rather than resorting to high-tech methods which are expensive to buy and maintain. Lack of people willing to undertake agricultural pursuits is a global problem, and it contributes greatly to the spread of destructive monoculture, loss of bio-diversity among crops and household animals as well as to food monopolies. Farm cooperatives with less emphasis on mechanization seems to become an increasing necessity everywhere.
8. Undertake independent research to determine the long-term effects of biocide residues, genetically modified flora and fauna, ‘taste enhancers’ sweetners, food preservatives, etc., on us as well as our environment.
9. Construction of storage facilities at close to food production centres; these should not be ultra-modern, but rather appropriate for the area’s climate, easy to maintain with local resources and know-how, and provide protection against local agents destructive to food.
10. Establishment of small, simple and effective food preservation facilities close to the production centres; drying, salting, smoking, making conserves etc., can be efficiently carried out in most areas, which may provide employment for many people.

Transport policies:

1. Actively support railway and water transport and depreciate the use of road transport of food. Do please bear in mind the myth of ‘clean’ electric transport, because all too often the power used in city trains etc., is generated using fossile fuel out of sight from cities. Pollution out of sight should not be pollution out of mind.
2. Effective and appropriate local transport systems linked to the national transport network.
3. Paying careful attention to regular repair and maintenance. I have not mentioned energy policies because they are a secondary consideration as it becomes a need as it is needed in transport, agriculture, education, etc., but not needed just for itself. Therefore, appropriate energy elements should be an integral part of most policies.

Health policies:

1. Competence acquisition and work efficiency in food production and sales is influenced by one’s health. It is in this context the present policy segment is offered. Health personnel should be required to encouraged everybody to eat healthy food and shun the unhealthy things.
2. An expansion of adequately equipped health service units in agricultural areas manned by competent personnel should be undertaken.
3. Health authorities should depreciate expenditure on ‘prestige’ projects, and require the foreign donors to assist in providing basic health care to rural and remote areas., for funding them is often a problem.
4. Explore the possibility of foreign funding to retain health personnel at home on decent wages.

Economic and development policies:

1. Promote economic devolution and discourage private centralization of production and sales, especially of food. Multi-national food and cultivar ‘giants’ are no different from any other dictatorial centralized power apart from frank use of violence and pretensions to democracy.
2. Promote cooperative enterprise which is concerned with fair sharing of value exchanges; competition always ‘leaves somebody behind’ and it depends on unlimited consumption, something completely non-sustainable.
3. Development policies should reflect the two above policies.
4. Target development to rural areas and deprived parts of the cities, and they should strive to keep migration to cities more or less equal to leaving them.
5. No development that is not sustainable and fair should be undertaken. All sustainable endeavours are benign to our environment.
6. Greater emphasis should be put on projects to support family-owned and small holders everywhere.
7. Incentives should be given to growers of traditional crops and keep a variety of animal breeds.

Security policies:

1. As rms manufacture is under government control or supervision, it is incumbent upon the relevant governments to have a policy of strictly controlling and limiting arms sales so that more funds will be available in developing countries for the development of agriculture, health, etc.
2. Client governments should seriously consider limiting their purchase of arms in order to develop their food production and other essential services.
3. UN should initiate serious efforts to limit the need for conventional arms by every available means.
4. Much might be achieved if governments are willing to admit that country’s security is best served by promoting the well-being of its people rather than by arms. Deprivation breeds discontent and renders people open to dogmatic persuation as they have nothing to loose.
5. As excessive population makes sustainable cooperative development impossible, it has already become the greatest threat to global peace and stability. Apart from its ill effects on health, possibility of acquiring an appropriate education, enough food, shelter, etc., increasing abject poverty could be easily exploited by any religious or political demagogue with disastrous results. It is time to stop being complaisant and consider family planning as an urgent need globally.

Legal policies:

1. Ensure the laws are enforceable and are adequately enforced. It is better to have few just and enforced laws than thousands of wonderful statutes to which only lip service is paid.
2. Restrict economic competition and support its cooperative counterpart.
3. Require phasing out of trade monopolies, and support economic devolution.
4. Require the national governments to assert its authority in national economy, otherwise elections would be a joke and democracy a parody of it. Recall that the majority need to purchase food which is an economic transaction. No rational being could leave national nutrition and food security to multi-national concerns.
5. Restrict advertising of food and beverages; and when their deleterious effect on health, local food culture or agriculture is evident, they ought to be banned.
6. Undertake action to improve national and internatonal governance with a view to transform the economy from being competitive to cooperative.

This list of policy segments is not exhaustive; however, it point towards a change in our received values, both in economics and agriculture and sale of food. I will not uswe the word ‘distribution’, for food is distributed free of charge during disasters, by charities even in affluent countries. What we mean here is a commercial transaction i.e., sales. So, let us use the correct word.

As poor nutrition and food security is endemic in some non-affluent countries and their total population is far higher than that in other nations, we face a pragmatic difficulty when it comes to implementing a sufficient number of suggested policies. Political reluctance and lack of resources are the two main hindrances one would face.

So, it would be necessary undertake active initiatives at global and regional levels to facilitate their adoption at the national level. Regardless of individual economy, growing shortage of people able and willing to engage in agricultural pursuits is a global problem. In affluent countries, it has led to mechanized giant indurstrial farms where monoculture prevails and animals are raised and slaughtered under inhumane conditions. I hardly need to elaborate on the dire consequences such farming methods entail both to the environment and to food security. Our perception of food production as something only fit for village yokels has to be changed, and changed quickly.

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

The present set of policy segments is neither complete nor is it comprehensive within each segment. However, they are adequate to illustrate my purpose, i.e., what generic approach may employmed to achieve our objective. Its usefulness at global, regional and local (national in this context) level may be summarized thus:

1. Revision of food systems in order to ensure adequate global nutrition and food security cannot be achieved in isolation. This applies to policy implementation at every level. High degree of coordinated actions in diverse areas is essential to our success. It is important to bear in mind that in different regions and countries what areas will be most relevant may vary considerably. For instance, in Western Europe, health, law and order is not as critical to the achievement of our goal as it may be in some other regions.
2. Certain policy segments are shared i.e., trade and employment policies influence food production as well as sale. Therefore, those policy domains should contain a policy segment to promote and support the latter two activities. Thus, each policy domain will contain one or more elements to enhance them in a fair and sustainable way.
3. Some supportive policy elements eg. Security can hardly be addressed by individual nations and require an international effort. Likewise, regional endeavours may be very useful in agricultural cooperation when they include countries whose food cultures have much in common. Selection of what approach is to be adopted, whether it ought to be global, regional or purely national depends on the range and scope of the issue one intends to resolve.
4. It would be unrealistic to think of global, regional or even national policies that could be applied as recommended from above. Thus, a global policy on implementation would have to be adopted to suit the regional conditions, which in turn would have to be tailored to meet the local i.e., the national requirements. Hence, one can only speak of a generic policy framework that may be elaborated and revised as required. At the national level, this may need re-formulation when there are regional differences, or indeed, local variations within a country. This mode of policy formulation and implementation represents a recursively implemented policy approach. Moreover, each policy has its supporting elements embodied in other relevant policy domain, hence, it is distributed.

I hope this may be of some use.

Best wishes!

Lal Manavado.

## Maha Bazzi, World Animal Net, United States of America

Hello,

Thank you for the opportunity to contribute to the Zero Draft of the Voluntary Guidelines.

On behalf of World Animal Net, please find attached our comments and suggestions incorporated into the proposed template.

Best Regards,

Maha Bazzi | Project Manager-International Policy at World Animal Net

**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?**

The 2019 State of Food Security and Nutrition in the World Report states that “Climate change and increasing climate variability and extremes are affecting agricultural productivity, food production and natural resources, with impacts on food systems and rural livelihoods, including a decline in the number of farmers.”[[17]](#footnote-17) The new [Special Report on Climate Change](https://www.ipcc.ch/site/assets/uploads/2019/08/4.-SPM_Approved_Microsite_FINAL.pdf) by the Intergovernmental Panel on Climate Change (IPCC) states that “Observed climate change is already affecting food security” and that “Food security will be increasingly affected by projected future climate change”[[18]](#footnote-18). Instead of adopting a reactive approach that encourages “climate change adaptation and mitigation”, mentioned in the Zero Draft, it is vital to adopt a proactive approach to the climate crisis, by addressing some of the root causes and drivers of climate change.

For example, intensive livestock production harms the environment and accelerates biodiversity loss by forcing a transition to the production of monoculture crop and animal systems which relies heavily on chemical inputs, contributes significantly to climate change, pollution of waterways, air and soil, and are key drivers of deforestation.[[19]](#footnote-19),[[20]](#footnote-20) Not only is climate change hindering people’s ability to produce and consume food, climate change in itself is being exacerbated by industrial animal agriculture, which produces 14.5% of global greenhouse gas emissions, whereby creating a destructive loop of unsustainable production and consumption that contributes to food insecurity.

The fact that meat consumption is projected to continue to grow globally is a key underlying and overlooked problem, both because of the unsustainable production practices of the vast majority of meat and dairy products, but also due to the negative impact of overconsumption of these products on nutrition and health.

Paragraph 9 of Chapter 1 of the Zero Draft mentions that consumption patterns and food systems are interlinked and shaped by one another and that food systems can largely impact “producers’ decision and consumers’ choices”. According to the World Health Organization (WHO), “There is a strong positive relationship between the level of income and the consumption of animal protein, with the consumption of meat, milk and eggs increasing at the expense of staple foods.”[[21]](#footnote-21) With global incomes predicted to be 3 to 4 times higher in 2050 than in 2010[[22]](#footnote-22), the consumption of animal products is also bound to rise. In fact, the IPCC states that “emissions from crop and livestock are expected to increase by 30-40% from present to 2050, under business-as-usual scenarios that include efficiency improvements as well as dietary changes linked to increased income per capita”[[23]](#footnote-23) and “Emissions from agricultural production are projected to increase, driven by population and income growth and changes in consumption patterns.”[[24]](#footnote-24) Scientists are warning that the resulting projected increase in greenhouse-gas emissions caused by agriculture would overload the planet’s coping capacity, unless it is offset by a reduction in global meat consumption[[25]](#footnote-25). The need to reduce meat consumption is also supported by research showing that the long-term overconsumption of meat can have serious negative impacts on human health[[26]](#footnote-26).

It is also important to acknowledge that intensive systems, which are the prevalent means of producing animal products, decouple animals from the land by relying on feed inputs like grains and soy, also grown intensively, which could otherwise be used to directly feed humans, instead of livestock. According to the World Economic Forum, this means that up to 20% of calories produced per person today are lost to feeding animals[[27]](#footnote-27). In fact, 83% of the world’s farmland is used to produce meat and dairy products and contributes 56 to 58% of food’s various emissions, despite providing only 37% of our protein and 18% of our calories.[[28]](#footnote-28) More people could be fed, using less land, by reducing the amount of grain fed to animals rather than humans. Studies show that if all meat and dairy production in the United States alone was converted to nutritionally comparable plant-based foods, the US would be able to feed an additional 350 million people, exceeding the projected benefits of eliminating all supply-side food losses[[29]](#footnote-29). The losses entailed in feeding cereals to animals means that this practice is increasingly being recognized as undermining food security. The UN FAO states that further use of cereals as animal feed could threaten food security by reducing the grain available for human consumption[[30]](#footnote-30).

The Voluntary Guidelines refer to climate change as an example of drivers impacting “the functionality of food systems and their ability to deliver healthy diets”. The guidelines should also explicitly include the intensification of the livestock sector, as well as the rising consumption of animal products, as important and core drivers that are hindering food systems and their future sustainability.

**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?**

Comments on principles:

Paragraphs 20 and 21: We are pleased to see the heavy emphasis in the principles on achieving policy coherence and addressing policy fragmentation. However, given this emphasis, we are surprised to see that animal welfare is completely omitted from the document as a whole, and that animal health appears only once, in the context of antimicrobial resistance. The World Organisation for Animal Health (OIE) is the key intergovernmental organization dealing with policy and standards for the production of animal products, and among its objectives is to promote food safety through “a better guarantee of food of animal origin and to promote animal welfare through a science-based approach.”[[31]](#footnote-31) Therefore, we suggest that in paragraph 21 “animal welfare” be included among the issues listed as being of key importance to food systems and as it has a “dedicated normative intergovernmental process.”

We are also surprised to see that there is no mention in the draft principles that diets should be predominantly plant-based. The World Health Organization (WHO), in its healthy lifestyle guidelines, which are accepted by the FAO[[32]](#footnote-32), clearly states that the first step to healthy eating is to “Eat a nutritious diet based on a variety of foods originating mainly from plants, rather than animals.”[[33]](#footnote-33) According to the FAO, “One important step that governments can take to signal their commitment to a more sustainable and healthy future, is to develop and disseminate food based dietary guidelines (FBDG) that embed health and sustainability objectives. These can then form the basis of policies seeking to foster such patterns.”[[34]](#footnote-34) In a comparative analysis of FBDGs from the only four countries that do provide guidance on sustainability, it was found that all four highlight “that a largely plant-based diet has advantages for health and for the environment” and that three of those “talk about the high environmental impact of meat.”[[35]](#footnote-35) The recent [Special Report on Land and Climate Change](https://www.ipcc.ch/site/assets/uploads/2019/08/4.-SPM_Approved_Microsite_FINAL.pdf) by the IPCC, states that “Consistent evidence indicates that [...] a dietary pattern that is higher in plant-based foods, such as vegetables, fruits, whole grains, legumes, nuts, and seeds, and lower in animal-based foods, is more health-promoting and associated with lower environmental impact”[[36]](#footnote-36) than the current global average diets. Crucially, the report asserts that “there is certainly significant overlap between [diets] that are healthier (e.g., via eating more plant-based material and less livestock-based material), and eating the appropriate level of calories.”[[37]](#footnote-37) Therefore, in paragraph 32, where the Draft Guidelines reference the healthy diets criteria, and in all other relevant areas, it is crucial for the Voluntary Guidelines to favor and encourage the consumption of plant-based foods over animal-sourced foods in order to truly promote sustainable and healthy consumption patterns.

Guiding principle 36-c in Chapter 2: “Promote policies that are intended to enhance the livelihoods, health and well-being of the population and enhance the sustainability of food production and consumption as well as the protection of biodiversity and ecosystems” cannot be addressed without taking into consideration some of the core issues at the heart of intensive food production systems, as mentioned in our answer to question 1. For example, a recent study found that “Rapid increases in meat and milk production result in sharp rises in land clearing in tropical regions that harbour high levels of biodiversity”[[38]](#footnote-38). Links must be drawn between the impact of dietary trends on ecosystems. Although it is encouraging that principle 36-c mentions the need to protect biodiversity and ecosystems, it would be more comprehensive if it also addressed the need to protect animal welfare. The most recent Draft Report by the FAO on *“Biodiversity and the livestock sector”* explicitly states that “Biodiversity assessments can be coupled with the analysis of other social and economic attributes that consider **animal health and welfare**...”[[39]](#footnote-39) A growing number of organizations are acknowledging the crucial role positive animal health and welfare play in food systems and should the CFS Voluntary Guidelines do so as well, this would further promote policy coherence across the board.

Guiding principle 36-e in Chapter 2 calls for strengthening “nutrition education at individual and community levels to facilitate producers’, food processors’ and consumers’ decisions and to foster informed choices about food products for healthy dietary practices.” Nutrition education can be strengthened by drawing from peer-reviewed scientific studies conducted in the field of nutrition. Studies have shown that animal products derived from higher welfare production systems have significantly better nutritional benefits than those derived from intensive production systems.[[40]](#footnote-40) In addition, research has shown that consuming healthy plant-based diets and reducing the consumption of animal products is more beneficial for human health[[41]](#footnote-41),[[42]](#footnote-42),[[43]](#footnote-43).

A multi-layered approach is therefore required:

* Policies should require producers to meet animal welfare standards, at minimum the internationally-accepted standards established by the World Organisation for Animal Health (OIE).
* Policies should educate consumers about the positive impacts of better animal welfare practices on the environment and on animal and human health.
* These should be complemented by policies that foster a reduction in the consumption of meat and dairy products and an increase in the consumption of non-animal products.
* Guiding principles should encourage the use of labeling schemes (based on welfare, health and environmental criteria), certification programs (based on welfare, environmental and health criteria), and fiscal incentives/disincentives, including:
  + Eliminating subsidies for products with social/health, environmental and animal welfare costs and detrimental impacts.
  + Taxing particularly harmful foods- in terms of social/health, environmental (emission intensive) and/or Animal Welfare criteria.
  + Reallocating funds to support the research, development and promotion of healthy, environmentally and welfare-friendly systems and products, including meat and dairy alternatives.
  + Support, promote, educate and train small-scale producers, especially in developing countries, in animal-welfare-friendly, agroecological production methods that are sustainable and respect local environments.
  + Promote the consumption of smaller quantities of animal products, which could then be produced using higher animal welfare standards, and according to agroecological principles – as opposed to industrially produced.

Through the implementation of these fiscal and regulatory measures, coupled with consumer education and awareness, dietary patterns can be shifted to better serve human and environmental health.

Only when all actors in the food system are made aware of the impact of different production and consumption patterns on human, environmental and animal well-being, can there be a holistic framework that truly “considers food systems in their totality” (Paragraph 36-a). This framework can then allow for producers and consumers to make informed choices, whereby creating a more sustainable loop of production and consumption.

**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?**

Paragraphs 12, 19, 21 and 39: Again, we are pleased to see an emphasis on the need to tackle policy fragmentation and to promote coherence across all levels and sectors in order to produce guidelines that address all the different aspects of food insecurity.

Food supply chains:

One important cross-cutting factor that can directly improve nutrition improvement pathways is the incorporation of animal welfare standards in food production systems. The OIE Animal Welfare Standards, which have been agreed upon by the 182 member countries of the OIE, provide an established policy framework that can be drawn upon as a policy entry point. For example, in 2016, The International Organization for Standardization (ISO), acknowledged that: “As consumer awareness of animal welfare issues continues to rise, the demand for products complying with animal welfare standards is growing, giving producers who maintain these high standards a competitive advantage”[[44]](#footnote-44). In light of this, the ISO adopted a new technical specification, [ISO/TS 34700:2016](https://www.iso.org/obp/ui/#iso:std:iso:ts:34700:ed-1:v1:en)- ‘*Animal welfare management – General requirements and guidance for organizations in the food supply chain’.* This specification, developed in conjunction with the OIE, serves to ensure that farm animals are humanely treated across the supply chain. As stated by Dr Monique Eloit, Director General of the OIE: “Consistent implementation of humane and ethical rearing conditions for animals provides certainty for farmers and producers, and confidence for consumers.”[[45]](#footnote-45) This is a great example of how existing frameworks are successfully leveraged in order to create coherent policies across related sectors that serve to benefit producers as well as consumers.

There is a clear overlap between the scientifically-backed benefits of adopting animal welfare measures (1) and the aim of the Voluntary Guidelines (2):

1. The OIE Animal Welfare chapter states that: “In food production systems, attention to animal welfare can improve productivity, quality, food safety, and economic returns, and therefore contribute to food security and economic prosperity.”[[46]](#footnote-46)
2. Paragraph 42 of the Zero Draft states that “Interventions across food supply chains can affect the availability, affordability, accessibility, safety and acceptability of nutritious food for a healthy diet.”

**Such “interventions” must incorporate better animal welfare practices, which can positively affect all the factors outlined in Paragraph 42.**

In 2016, the Committee on Food Security (CFS) recommended that all livestock production systems should “Improve animal welfare delivering on the five freedoms and related OIE standards and principles […] and supporting voluntary actions in the livestock sector to improve animal welfare;” and “Promote a physical environment [...] that ensures compliance with the OIE welfare standards, including the Five Freedoms”[[47]](#footnote-47). These policy recommendations, which were developed based on the recommendations of a scientific report by the High Level Panel of Experts on Food Security and Nutrition (HLPE)[[48]](#footnote-48), can and should be incorporated into the CFS Voluntary Guidelines on Food Systems and Nutrition, which would further foster policy coherence within the CFS framework.

Thepost-2020 global biodiversity framework[[49]](#footnote-49) will soon be established by the [Convention on Biological Diversity](https://www.cbd.int/) (CBD). This presents a unique opportunity for CFS to develop guidelines that are aligned with the goals of the CBD:

* Target 2 of the CBD Aichi Biodiversity Targets recognizes that “Biodiversity underpins a wide range of services that support economies, food production systems, secure living conditions and human health”[[50]](#footnote-50).
* Chapter 2 of the Zero Draft calls to “Promote policies that [...] enhance the sustainability of food production and consumption as well as the protection of biodiversity and ecosystems”.

The CBD recognizes the importance of biodiversity for sustainable food production systems while the CFS acknowledges that policies for food production systems should also protect biodiversity. Therefore, the goals of the CBD and CFS are mutually reinforcing and these connections should be further leveraged and highlighted to promote policy coherence. To that end, in: Food Supply Chains/1-Production Systems/Policy Relevant Areas/ **a) and d):** We recommend specifically acknowledging the need to mitigate agriculture’s negative impacts on biodiversity and to address the importance of preserving biodiversity as a whole. This requires going beyond promoting the protection of agroecosystems and the use of agrobiodiversity. Although agrobiodiversity is an important subset of biodiversity, it is crucial to adopt a wider, more comprehensive view of biodiversity. As noted in the The IPBES Global Assessment on Biodiversity and Ecosystem Services Report, “Agriculture is a fundamental driver of global biodiversity loss through its area expansion and the increase of pollutants and of resources used in production”.[[51]](#footnote-51)

Food Supply Chains/1-Production Systems/Policy Relevant Area/ **e):** We suggest acknowledging the importance of animal welfare in “maintaining and enhancing the efficiency and the resilience of production systems”. As noted by the 2016 HLPE Report: “Improving animal welfare can contribute to both resilience and resource efficiency.”[[52]](#footnote-52)

Food Supply Chains/1-Production Systems/Policy Relevant Area/ **h)**: We suggest acknowledging the potential for innovation in the alternative protein sector. As indicated by the International Food Policy Research Institute’s (IFPRI’s) Director General, Shenggen Fan, “alternative proteins such as lab-grown meat can help to reduce agricultural greenhouse gas emissions and resource use.”[[53]](#footnote-53)

Food Supply Chains/1-Production Systems/Policy Relevant Area/ **j)**: We suggest acknowledging existing collaborative approaches on AMR, including the Tripartite Collaboration on AMR being championed by the FAO, OIE and WHO.[[54]](#footnote-54)

Food Supply Chains/2-Handling, Storage and Distribution/Policy Relevant Area/ **a):** We suggest acknowledging the amount of meat lost, spoiled and damaged during the transport and slaughter of food-producing animals due to poor welfare and handling conditions. As noted in a 2014 HLPE report on “Food losses and waste in the context of sustainable food systems”:

“Transport of livestock is known to be stressful and injurious, which can lead to poor animal welfare and production loss”[[55]](#footnote-55). The report cites several case studies where hundreds of thousands of animals die, get injured, sick, during transport, due to poor welfare conditions, leading to severe losses for all actors in the food system.

In addition, the various stresses experienced by animals during handling, transport, stunning and pre-slaughter conditions negatively impact the quality of the meat, rendering it unusable and unsellable (examples include Pale Soft Exudative (PSE) in pork meat, Dark Firm and Dry (DFD) in meat from sheep, cattle, poultry as well as bruising and injuries)[[56]](#footnote-56). High standards of operational animal welfare must hence be implemented and maintained.

Food Supply Chains/4-Retails and Markets: We suggest acknowledging the growing role that animal welfare plays in influencing retailers’ choice of products. As indicated by the 2016 HLPE report: “Retailers are increasingly demanding production systems that take into consideration animal welfare.”[[57]](#footnote-57)

Also, in order to consider the impact of all “drivers of change, such as international trade and demographic trends”, we suggest addressing the fact that, according to the HLPE, “sanitary, environmental and animal welfare certification measures are of increasing importance for international trade.”[[58]](#footnote-58)

Food environments:

Food Environments/ 1-Availability and Physical Access /Policy Relevant Area / **b)** : In Chapter 1, the guidelines acknowledge recent work on food systems by various UN entities, including UN Environment (at UN Environment Assembly 4). Noting that the Background Report of the Executive Director, prepared in advance of UNEA 4 states:

“Governments can also reduce the environmental impact of food consumption by adjusting national dietary guidelines and related nutrition policies. Additional measures that can be considered include the promotion of sustainably raised and grown foods, including sustainably produced plant-based meals in public institutions, such as schools and hospitals, and increased dialogue with private sector companies to encourage them to improve the nutritional quality of their food.”[[59]](#footnote-59)

We suggest that voluntary guidelines for public procurement should predominantly include plant-based options, in line with the WHO health guidelines. There are already a number of standard-setting organizations working to improve procurement practices which can provide models for public procurement voluntary guidelines, such as [The Sustainability Tracking, Assessment & Rating System™](https://stars.aashe.org/about-stars/) (STARS), the [Good Food Purchasing Program](https://goodfoodpurchasing.org/), and the [Real Food](https://www.realfoodchallenge.org/) initiative. These are adopted by public bodies, such as public universities, community colleges, research institutions and K-12 public school systems. All these programs promote sustainable practices and food systems in action, such as purchasing foods according to values that respect local economies, health, food chain workers and farmworkers, animal welfare, culture, education, climate and environmental sustainability[[60]](#footnote-60),[[61]](#footnote-61).

Food Environments/ 2-Economic Access /Policy Relevant Area / **b)**: We suggest recommending imposing taxes on resource-intensive, and/or environmentally damaging foods and on those that have high negative social and health impacts, taking into account national and local contexts. According to IFPRI, “taxing emissions-intensive foods such as meat could reduce greenhouse gas emissions and the use of natural resources, and avoid hundreds of thousands of deaths, as such foods are associated with dietary and weight-related risk factors.”[[62]](#footnote-62) What’s more, studies suggest that “Health related food taxes could improve health […] taxes are likely to shift consumption in the desired direction.”[[63]](#footnote-63) These types of taxes have also been shown to narrow health inequalities by granting access to healthier foods to poorer people whereby reducing the incidence of costly diet-related diseases in the long-run.[[64]](#footnote-64)

However, fiscal and pricing policies should not be limited only to taxes, but also to the use of subsidies. Referring again to IFPRI:

“Governments should eliminate subsidies for nutrient-poor foods and convert those funds to investments for more nutritious crops such as fruits and vegetables. Subsidies for agricultural inputs can also lead to overuse of inputs and natural resources, exacerbating land degradation and emitting more greenhouse gases.”[[65]](#footnote-65) In addition, A 2016 WHO report stated “strong evidence that subsidies for fresh fruits and vegetables that reduce prices by 10–30% are effective in increasing fruit and vegetable consumption” and “Vulnerable populations, including low-income consumers, are most price-responsive and, in terms of health, benefit most from changes in the relative prices...”[[66]](#footnote-66)

Food Environments/ 4-Food Quality and Safety / Policy Relevant Area / **a)**: In terms of food safety, the OIE animal health and welfare standards, which have a goal of improving the safety of animal products, should be referenced. As mentioned in the 2016 HLPE report, actions are needed to “to reduce the prophylactic use of antibiotics in animal care and to improve animal welfare”[[67]](#footnote-67). Animal systems need to be completely transformed so that animals do not need to be routinely fed antibiotics. This also means supporting small-scale, agroecological systems that respect animal welfare. These systems provide animals with the ability to express their normal behaviors, do not expose them to the stresses of overcrowding and large group sizes, and strengthen animals’ natural immunity without requiring medication[[68]](#footnote-68).

Consumer Behavior:

We support paragraph 54, which highlights the important role that consumer behavior plays in opening “pathways to more sustainable food systems”.

A worldwide study found that “81% of global respondents felt strongly that companies should help improve the environment”[[69]](#footnote-69) and that consumers are shifting their buying habits accordingly. Even more, “Regions that are rife with emerging market consumers—many of whom are dealing with environmental hazards in their everyday lives—show higher expectations than developed markets.”[[70]](#footnote-70) Research also shows that “Regarding the options to reduce meat intake in developed countries, [...] there is an apparent sympathy of consumers for meat reduction due to environmental impacts which has not been exploited.”[[71]](#footnote-71)

Animal welfare can also play a role in altering production and consumption patterns. The 2016 HLPE report states

“Animal welfare is an increasing public concern, raised by consumers and often by retailers who are responding to consumer demand.”[[72]](#footnote-72)

Consumers, whether well or ill-informed about what constitutes an adequate food system, play a key role in steering market demand, and in swaying producers to shift their practices to meet that demand. Knowing how animals are treated within the supply chain as well as being aware of the environmental impacts of certain foods can strongly influence the choices consumers make. Consumers have the right to know how animal welfare not only impacts food quality and their health but can also clash with their cultural norms, and beliefs and values.

Paragraph 55: Food and nutrition education and information should also incorporate the negative impact of prevalent food production systems on the environment and animals, and information about how transitioning to plant-based diets can contribute to better human health and environmental wellbeing.

As noted in the Background Report of the UNEP Executive Director, prepared in advance of UNEA 4:

“Individual changes and actions can also add up to major reductions in food waste, less climate

change impact and a healthier environment. They can also help to stimulate a vibrant, diverse

smallholder production sector that can thrive alongside agribusiness. The most significant changes that individuals and households can make are to reduce food waste and opt for sustainably raised and grown foods, including sustainably produced plant-based meals."[[73]](#footnote-73)

To further empower individuals to make these positive changes and choices, under the policy-relevant areas of “Food Nutrition and Education Information” consider adding a point about the importance of labeling (currently referred to under Promotion and Advertising) as well as quality and welfare certifications. These can act as as educational tools, aiding consumers in identifying and choosing healthier, “more sustainably raised and grown foods”. They can also provide farmers and producers with market differentiation opportunities, and incentivize them to shift their practices to meet the requirements of using certain labels or certifications to promote their products. Incorporating education about the meaning of the different labels and certifications into Nutrition Education programs would further help consumers and producers make sustainable and ethical choices.

Paragraphs 56-a and 56-b: the worldwide increase in consumption of animal products is shifting traditional diets away from healthy and balanced consumption patterns toward unhealthy, and unsustainable patterns. This evolving, negative food habit, needs to be addressed for its potential negative impacts on the environment, human health, and cultural traditions.

**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 policy-making?**

The definition used for food systems in the Zero Draft is: “Food systems gather all the elements (environment, people, inputs, processes, infrastructures, institutions, etc.) and activities that relate to the production, processing, distribution, preparation and consumption of food, and the output of these activities, including socio-economic and environmental outcomes.” Consider adapting the definition to include animals, as animals are inextricably tied to all the elements and activities mentioned in the current definition.

Feeding people at the expense of the environment and animal welfare is not sustainable in the long-run. An ideal food system is one that delivers nutritious, healthy, mostly plant-derived food, to all people while protecting the environment and animal welfare and ensuring the ability of future generations to sustain themselves.

The IPCC report states it well: “Policies that operate across the food system, including those that reduce food loss and waste and influence dietary choices, enable more sustainable land-use management, enhanced food security and low emissions trajectories [...] can contribute to climate change adaptation and mitigation, reduce land degradation, desertification and poverty as well as improve public health.”[[74]](#footnote-74)

Some metrics that can be utilized:

- Calculating the percentage of land used for meat and dairy products and comparing it to the percentage of protein and calorie intake that it delivers.

- Calculating the proportion of human edible grains that are being fed to produce livestock.

For example, currently, 83% of agricultural land is delivering just 18% of calories. Conversely, just 17% of agricultural land is delivering 82% of our calories. In an ideal system, the conversion of land to calories should be significantly more efficient. In an ideal system, pasture/extensive raised livestock can convert non-edible vegetation on non-arable lands into calories. However, feeding human edible grains to livestock is an inefficient use of resources. Ideally, no human-edible grains should be fed to livestock.

* Resource use and efficiency metrics:
  + Metrics that evaluate the resource use per calories, the pollution per calorie, greenhouse gas emissions per calorie, etc…
  + Metrics based on area or resources used and comparing the efficiency of different production systems.
* Metrics that calculate ecosystem stability and ecosystem status for different food systems[[75]](#footnote-75).
* Food affordability and accessibility metrics, which take into account desired outcomes (healthy, sustainable diets) and market distortions such as subsidies and taxes, as these can make undesirable foods artificially affordable.
* Animal health and welfare metrics, such as the [Animal Protection Index](https://api.worldanimalprotection.org/), which ranks countries based on their commitment to animal protection.

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

Once endorsed by CFS, these Voluntary Guidelines, if they draw from existing policy structures and address some of the gaps in others, can provide a holistic framework towards addressing food insecurity that truly takes into consideration all the factors, actors and systems at play when tackling food insecurity.

The guidelines are also a good opportunity to raise awareness about the main hurdles to overcoming food insecurity and can serve to influence the development of national legislation and strategies in countries where they are most needed. These guidelines can also help direct development aid policies and priorities. They can and should lead to the implementation of policies that enable people to access adequate nutrition, all the while educating producers and consumers about humane and sustainable food systems and consumption and production practices.

The FAO and FCRN, in their joint report on sustainable and healthy dietary guidelines, propose a comprehensive set of principles that must guide the process of developing sustainable dietary guidelines, in order to “ have a real effect on food consumption” and on “the environmental impact of diets”[[76]](#footnote-76). Some of the most signficant suggestions mention the need for governments to be the owners and disseminators of nutritional guidelines. They must also develop different versions of the guidelines in order to target a variety of groups, from the general public, to health professionals, consumer groups, and actors across the food sector. The guidelines must also be linked to implementable policies at all levels: in schools, hospitals, public procurement, advertising and industry standards and they should be promoted extensively. They should be developed “based on the advice of scientists and professionals from both health and environmental fields” and “a consultation process” involving civil society. Most importantly, the FAO and FCRN advise that guidelines should be geared towards “Limiting meat consumption” according to national contexts as well as “Provide guidance for those who wish to adopt vegetarian or vegan diets.” In order to promote policy coherence, the CFS guidelines should leverage these principles and incorporate them both during the drafting process, and in the final version of the Voluntary Guidelines.

As mentioned in the IPCC report: “Effective governance of food systems and climate change requires the establishment of institutions responsible for coordinating among multiple sectors (education, agriculture, environment, welfare, consumption, economic, health), levels (local, regional, national, global) and actors (governments, CSO, public sector, private sector, international bodies). Positive outcomes will be engendered by participation, learning, flexibility and cooperation.”[[77]](#footnote-77)

## Wayne du Plessis, SAFCEI, South Africa

Good Day

Please find comments from the Southern African Faith Communities Environmental Institute.

Overarching comments:

1. While the guidelines make brief mention to the role purchasing power plays in food security, it lacks the emphasis needed - considering that rapid urbanization is occurring in developing countries, bringing with it an increase of dependents on money for food access and growing urban poor populations.

2. There is no mention of preventing the displacement of smallholder and subsistence farmers from their land due to large agribusiness interests. A process which is occurring in many developing countries and is jeopardizing rural communities resilience to climate shocks.

3. There should be guidelines on the importance of services for home food access and food preparation (such as clean water and fuel for food preparation and cooking).

4. There should be a guideline that promotes the regulation of pesticide use, considering the impacts pesticides have on farm workers, surrounding farming communities, and the environment.

5. While the guidelines do consider sustainable sensitive agricultural practices (43.(A)) it does not put the necessary emphasis needed considering the current climate and environmental crises we are facing and the substantial impact unsustainable farming practices have on creating and perpetuating this crisis. The guidelines need to not only consider the primary processes that are used and degraded for food production but also the supporting systems and processes that are at risk. Environmentally sensitive farming approaches are essential for the survival of humans on this planet.

6. Lastly the guidelines do not mention the special role that women predominantly play as food providers and how this impacts their role in the food system. This role is important to mention as it indicates that women and the challenges they face are key in creating food systems change.

Comments aimed at specific paragraphs:

43. (G). Women producer's livelihoods (pg 11) - It would be valuable to include supporting the informal sector as it plays an important role in both food security for consumers and employment for women excluded from formal employment.

43. (K). Resilient Food Supply chains (pg 12) - This should consider the distance food is transported and the close link food price has with oil price. Shorter food distances lessen the risk of lack of food access due to oil shortages/price increases.

45. Processing and Packaging (pg 12-13) - There also needs to be a focus on innovation in packaging to enable the safe transport of food without using plastic and non biodegradable materials due to the substantial harm food packaging is causing the environment.

46. (A). Support smallholder farmers (pg 13) - In order for smallholder farmers to compete with large integrated agrifood supply chains, smallholder farmers need support with market access through the development of agricultural hubs or appropriate trading spaces.

48. (B). Public food procurement (pg 14)- There should also be an emphasis on procuring from marginalised smallholder farmers.

Compiled by Robyn Bowden - SAFCEI Food and Climate Justice Cordinator robyn@safcei.org.za

Regards

## Luis Antonio Hualda, University of the Philippines Mindanao, Philippines

Dear FSN Forum Team,

Thank you for opening the opportunity to contribute to this important document. Please find attached my contribution to the consultation on the development of the Voluntary Guidelines on Food Systems and Nutrition.

Kind regards,

Luis Antonio T. Hualda

**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?**

Paragraph 21 - Another related issue that needs to be highlighted is land use for agriculture and the location of markets for accessing safe and nutritious food.

**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?**

Paragraph 36 - On the guiding principles "a) Systemic and holistic and evidence-based approach." I think it should also include "…seeks to simultaneously maximize outcomes and reduce externalities across all sustainability dimensions". Using a systemic approach can help identify the multidimensional causes of malnutrition and identify key strategic points for implementation. The same approach may be used to identify unintended consequences that implementation of policies may bring.

**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?**

A possible entry point to foster policy coherence and address policy fragmentation is through the empowerment of local or sub-national governments, who are often the implementing arm of national policies and initiatives for food systems and nutrition. National policies may be well-designed, but the gap may exist in implementation if the implementing arm does not have the resources and capabilities. Local and sub-national governments can also be effective in designing food systems and nutrition initiatives that can respond to local needs and available natural, financial and human resources.

In this suggested entry point, empowering local and sub-national governments can be through enhancing capabilities of local planners and policy-makers in planning local food systems. National policies that can provide local and sub-national governments with autonomy on land use and fiscal decisions may also be needed to empower them.

**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 policy-making?**

In "a) Food deserts and food swamps", aside from encouraging the availability of outlets enabling healthy diets, options for making food production closer to consumption in urban areas such as urban agriculture may be encouraged. Another option aside from public food procurement is encouraging Community-Supported Agriculture (CSA) that can help ensure urban communities have stable access to food while rural smallholder producers have stable access to markets.

Paragraph 53 - Food quality standards, particularly fresh produces, needs to be changed from looking mainly at physical and cosmetic attributes to nutritional content and value. Food quality standards imposed by supermarkets and consumers that are based on appearance can lead to waste, which can drive an increase in prices and adversely affect sustainability. A case in point is tomatoes grown in Australia wherein almost 90% of harvests is rejected for not meeting the required physical appearance <https://www.theguardian.com/environment/2017/oct/13/you-say-tomato-retailers-say-waste-research-finds-produce-problem>. This can also be the case in developing countries where private quality standards can reduce profitability of smallholder farmers.

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

The Voluntary Guidelines in its present form can provide stakeholders at the national and regional levels with ideas and points that are important to consider in designing policies for food systems and nutrition. It may further encourage stakeholders to adopt these guidelines if pathways can be presented, considering limited resources of governments and stakeholders. It may be presented as to which of the points in the guidelines may be adopted first that can provide the greater impact or serve as a key driver to change. It is recognized that presenting a key driver is context-specific, but this may be supported by examples.

## Ouayara Kone, Mali

Bonjour à vous. Veuillez trouver en fichier joint le document en objet. Bonne suite pour le FSN mondial.

Mr Koné du Mali.

**1. Le chapitre 1 reflète-t-il adéquatement la situation actuelle de la malnutrition et ses causes et impacts connexes, notamment dans la ligne des objectifs et cibles du Programme de développement durable à l'horizon 2030 ? Quels sont les problèmes sous-jacents qui empêchent aujourd'hui les systèmes alimentaires de fournir des régimes alimentaires sains ?**

L’état des lieux actuel de la malnutrition sous toutes ses formes dans le monde et particulièrement au Mali (dénutrition, carences en micronutriments, excès pondéral, obésité) est bien rapporté dans le projet de Directives volontaires soumis à notre appréciation. Il est en cohérence avec les ODD du Programme de développement durable à l'horizon 2030 des Nations Unies, mis en œuvre au Mali dans le contexte de l’atteinte de la sécurité alimentaire nationale (ODD 2 et cible 2.2). Institutions chargées de la mise en œuvre : ministères (santé et hygiène publique, agriculture, élevage/pêche, environnement, promotion de la femme, de la famille et de l’enfant, solidarité), collectivités territoriales, partenaires au développement.

En additif aux problèmes sous-jacents cités dans le **&24** de l’introduction, on peut signaler, dans le cas du Mali, *l’insécurité sociale et le mauvais usage des engrais et des pesticides* (dosage non contrôlé) avec des conséquences multiples sur la santé, notamment les maladies alimentaires non transmissibles.

**2. Quels devraient être les principes directeurs capables de promouvoir des systèmes alimentaires durables qui améliorent la nutrition et favorisent des régimes alimentaires sains ? Quels sont vos commentaires sur les principes énoncés au chapitre 2? Sont-ils les plus appropriés à votre contexte national/régional ?**

Ces principes directeurs du chapitre 2 sont les suivants. Mes commentaires suivent en police Italique :

1. **Approche systémique, globale et fondée sur des faits concrets.** Promouvoir une approche systémique, globale et fondée sur des faits concrets dans laquelle on considère les systèmes alimentaires dans leur globalité, on cherche à maximiser les résultats simultanément dans toutes les dimensions de la durabilité, et on examine les causes multidimensionnelles de la malnutrition sous toutes ses formes :

*après l’adoption des Directives volontaires par le CSA, ce principe s’alignera au Mali, sur la politique des pôles de développement Agricole (Agropoles), déjà élaborée mais non encore mise en route.*

1. **Politiques cohérentes et adaptées au contexte.** Contribuer à la formulation et à la mise en œuvre de politiques et d’investissements cohérents, adaptés au contexte et fondés sur des éléments concrets, grâce à des actions coordonnées entre les différents acteurs et dans tous les secteurs pertinents aux niveaux international, régional, national et sous-national :

*ce principe rappelle fort utilement l’approche One health/Un seule santé, lancée au Mali avant 2014.*

1. **Des gens en bonne santé, une planète en bonne santé.** Favoriser des politiques qui visent à améliorer les moyens d’existence, la santé et le bien-être de la population et à renforcer la durabilité de la production et de la consommation alimentaires ainsi que la protection de la biodiversité et des écosystèmes :

*ce principe rappelle fort utilement l’approche One health/Un seule santé, lancée au Mali avant 2014, mais redynamisée à partir de cette date, comme réponse à l’épisode d’Ebola. Cette redynamisation avait abouti à une forte mobilisation nationale des parties prenantes au-delà du seul ministère de la santé et de l’hygiène publique.*

1. **Égalité des sexes et autonomisation des femmes.** Promouvoir l’égalité des sexes et l’autonomisation des femmes et des filles en respectant leurs droits et en soulignant combien il est important de créer les conditions d’un engagement fort des femmes dans la création de systèmes alimentaires qui peuvent améliorer la nutrition :

*ce principe à portée transversale doit être validé parmi les priorités car la question de l’égalité des sexes et de l’autonomisation des femmes impacte beaucoup, négativement, sur les conditions de vie des femmes (et par conséquent sur la bonne nutrition des enfants qu’elles élèvent) dans les ménages en Afrique au sud du Sahara. Au Mali, une politique Genre et Développement (G&D) est mise en œuvre il y a plus d’une décennie pour améliorer cette situation.*

1. **Connaissances et sensibilisation en matière de nutrition**. Renforcer l’éducation nutritionnelle aux niveaux des individus et des communautés afin de faciliter les décisions des producteurs, des transformateurs d’aliments et des consommateurs et de favoriser des choix éclairés sur les produits alimentaires en vue de l’adoption de pratiques alimentaires saines :

*ce principe éclaire déjà sur les mesures d’accompagnement, entre autres, que les parties prenantes doivent mettre en place.*

1. **Concrétisation du droit à l’alimentation**. Favoriser la concrétisation progressive du droit à une nourriture suffisante dans le contexte de la sécurité alimentaire nationale au moyen de systèmes alimentaires durables, équitables, accessibles, résilients et multiformes :

*ce principe serait plus digestible sans la terminologie « droit à une nourriture suffisante dans le contexte de la sécurité alimentaire nationale… ». En effet, on peut penser qu’à l’opposé, il y a, quelque part, un « refus » ou mieux une «  non autorisation »* à une nourriture suffisante……. !

1. **Renforcement des capacités.** Renforcer les capacités humaines et institutionnelles, en particulier parmi les acteurs de la nutrition et des systèmes alimentaires, s’agissant de lutter contre toutes les formes de malnutrition et de renforcer les effets et la durabilité des programmes de nutrition ainsi que d’en élargir la portée :

c’est *l’une des mesures transversales les plus importantes parmi tant d’autres.*

**3.** **Sur la base des domaines politiques identifiés au chapitre 3 et des facteurs favorables suggérés au paragraphe 41 du Projet zéro, quels sont les points d'entrée politiques que le chapitre 3 devrait couvrir, compte tenu de la nécessité de favoriser la cohérence des politiques et de remédier à leur dispersion?**

Les points d’entrée pour la transformation des systèmes alimentaires en vue d’une meilleure nutrition  que les Directives volontaires pourraient utilisés sont (cadre conceptuel présenté dans le rapport du HLPE) :

* les chaînes d’approvisionnement alimentaire,
* les environnements alimentaires,
* et le comportement des consommateurs.

**4.Pouvez-vous donner des exemples précis de politiques, d'interventions, d'initiatives, d'alliances et d'arrangements institutionnels nouveaux qui devraient être envisagés, ainsi que des défis, des contraintes et des compromis se rapportant aux trois composantes des systèmes alimentaires présentés au chapitre 3 ? Selon vous, à quoi ressemblerait le système alimentaire « idéal », et sur quels objectifs/mesures peut-on s'appuyer pour orienter l'élaboration des politiques ?**

**A propos du système alimentaire « idéal »**. Quel sens veut-on donner au mot « idéal » si :

* la typologie des systèmes alimentaires proposée dans le rapport du Groupe d’experts de haut niveau sur la sécurité alimentaire et la nutrition (HLPE) définit trois grands types de systèmes alimentaires: 1) les systèmes alimentaires traditionnels; 2) les systèmes alimentaires mixtes; et 3) les systèmes alimentaires modernes et que chacun de ces systèmes comprend trois composantes qui constituent des ‘’points d’entrée ou de sortie’’ de la nutrition : *les chaînes d’approvisionnement alimentaire, les environnements alimentaires et le comportement des consommateurs.* ?

Dans chacun de ces systèmes, le comportement des consommateurs (choix alimentaires) est une question de niveau de vie, de pouvoir d’achat et de changements conséquents des habitudes alimentaires. Tous ces paramètres ont une influence sur les régimes alimentaires qui orientent les systèmes alimentaires et la nutrition.

**5. En quoi ces Directives volontaires, une fois adoptées par le CSA, seraient-elles plus utiles aux différentes parties prenantes, en particulier aux niveaux national et régional ?**

N’étant pas contraignantes comme les normes,Les Directives volontaires serviront d’outils d’aide :

*à la planification, à la conception, à la révision et à l’évaluation des politiques, les investissements et les arrangements institutionnels efficaces qui permettent de s’attaquer à la malnutrition sous toutes ses formes. Dès lors les niveaux national et régional seront les plus concernés par l’emploi des Directives volontaires, une fois adoptées.*

## Laurence Rycken, International Dairy Federation, Belgium

Dear FSN Forum Team, Dear FSN Forum members,

The International Dairy Federation has been actively engaged through the CFS Private Sector Mechanism in drafting these voluntary guidelines on food systems and nutrition, and appreciates this additional opportunity to provide comments through this open consultation. We would like to commend Dr Liliane Ortega, CFS Food Systems and Nutrition OEWG Chair as well as the CFS secretariat for the work done so far.

We support the report acknowledgment of the complexity of the food systems and the many drivers which impacts them, as well as the need to take a holistic and evidence-based approach and foster dialogue among the different sectors.

As a general comment, throughout the document, CFS should:

* Ensure definitions of “healthy diets” remain focused on encouraging consumers to adopt and maintain balanced diets and do not directly or indirectly exclude or limit consumption of nutrient dense whole foods such as dairy products;
* Ensure all guidelines are science-based and consistent with WTO, Codex, and other international obligations;
* Ensure nutrient dense foods such as dairy are recognized as a critical source for their key nutrients; especially for populations at high risk of nutrient insecurity such as children and pregnant women
* Ensure the voluntary guidelines recognize the positive role of international trade in increasing access to and availability of a variety of foods, including dairy products;
* Guard against overt or disguised protectionism that decreases access to and availability of a variety of foods, including dairy products;
* Ensure environmental sustainability considerations are science-based and reflect the relative and absolute nutritional benefits of dairy foods.
* Carefully consider whether the voluntary guidelines as currently drafted will duplicate work or overlap with the mandates of other international organizations.
* Provide mechanism to revisit guidelines/set timeframe for update of global progress towards reduction in malnutrition.
* Acknowledge that due to regional and population differences that affect the HLPE five main categories of food system functionality, there is no single universal diet that combats malnutrition and ensures sustainable practices.
* Importantly, they should allow for the definition of “healthy diets” to include countries’ own national dietary guidelines instead of solely being defined by WHO indications.
* Acknowledge that trade-offs will exist within a food system in order to sustainably achieve a reduction in malnutrition and that countries should make these trade-off decisions based on regional and population relevant science-based information.
* Recognize that while smallholder farmers are necessary to help combat malnutrition, large holder farmers also play a significant role in sustainably reducing global malnutrition.

Milk and dairy foods are well-known for being naturally nutrient rich, providing an abundant supply high quality protein, calcium, phosphorus, potassium, iodine, and vitamins B2 and B12. This unique package of essential nutrients contribute to address all forms of malnutrition; it is associated with better growth, micronutrient status, cognitive performance and motor function development. In addition, several dairy products are scientifically proven to protect against some non-communicable diseases. There is an inverse association between dairy intake and colorectal cancer as well as between yogurt intake and risk of type 2 diabetes and between milk and stroke.

Dairy is then part of healthy diet and a major contributor to helping achieve many of the UN Sustainable Development Goals (SDGs) such as zero hunger and health and well-being as well as providing reliable livelihoods, helping to lift people out of poverty, empowering women, caring for the land, and much more.

The dairy community supports the CFS work to develop these voluntary guidelines on food systems and nutrition but wants to ensure that the role dairy products in making whole diets healthy is recognized.

Please find in attached documents our detailed comments on the draft voluntary guidelines on food system and nutrition.

Attachment:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/IDF%20comments%20CFS_Zero_Draft_Voluntary_Guidelines_Food_Systems_and_Nutrition%202019-08-19.pdf>

## Eyongetta Njieassam, University of Dschang, Cameroon

In my opinion and with respect to sub Saharan Africa, I think in order to developers a good guideline for food systems and nutrition we have to consider strongly the issue of gender marginalization and in adequate financial assistance to women die to cultural challenges. during the last hidden hunger congress that took place in the University of Stuttgart Germany, I did a presentation on gender marginalization and the contribution to the triple birders of malnutrition in dis Saharan Africa with my NGO gender and youth solidarity for Sustainable Livelihood. in my research, I found that early traditional marriage has put women into chains, participating in pleasant farming to feed their family. most of the small farms are owned and run by rural women, these women have limited access to land and with little financial support from donor groups or their husbands therefore they tend to cultivate mostly crops that can sustaining their household with seeds which are not improved. these crops range from cereals, rubbers etc, which mostly have high energy content but with low nutritional value. these women are mostly uneducated and are into early marriages and because of cultural affiliations, they toil day in day out in small farms to Carter for their families. as tradition May demand, the wife has to feign for the family without any support for the polygamous husband. so they go to farm work all day long come back home late in the night and prepare food harvested from farm for their families. the husband is served with high priority followed by children and which of course these women end up eating just the remains. most of such husbands have small cash received from the sales of extra cultivated cereals which they can use to run the daily live by buying drinks whil the women and children toil. at the end of the day the husband grows with protruded stomach becoming obsessed and probed with diseases like hypertension, cardiac arrest, diabetes etc while the women and cchildren be come malnourished, with frequent attack of anaemia, early child dead, brain deformation etc just to name a few. so I thing giving women equal opportunity in marriage, education, land ownership and funding can help to improve on food security and nutritional problems

-women should be part of administration and decision making positions in government offices and inter-NGOs whose objectives are to improve food security, agriculture nd nutrition in resilient communities.

women should be given the opportunity to fair decision on when, who and how they get married

-cultural and traditional early marriages shouldn't be encouraged

-women should be given equal opportunity towards education especially in the field of agriculture and, food security and nutrition

-short training courses on agricultural innovation should be sponsored to impact and train the rural women

-government ad other organizations should engaged in supplying rural women with improved seeds of highly nutritious foods for cultivation

-women should be granted equal opportunity as to land ownership

-agricultural subvention and other funding to target food security issues should be focussed on rural women

-government agencies and international organisations should be fair enough to provide scholarship in agriculture and food security and nutrition to young underprivileged women from local communities

-gender marginalization and gender based violence in homes, offices and schools should be totally stamped out and should be a priority for human right organisations and other agencies to educate local communities with diverse cultural background and traditional stigma

thank you E.S Njieassam

CEO, Gender and Youth solidarity for Sustainable Livelihood-Cameroon

## Fatima ELtahir, Food Security Technical Secretariat, Sudan

Answers:

**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?**

Yes

What are the underlying problems that currently hinder food systems to deliver healthy diets?

Low production of diversified food, weak linkages between (researchers who innovate standard qualities, extentionists and producers), Traditional means of production, lack of awareness of producers and consumers, poor information sharing and communications…etc,

**· What should be the guiding principles to promote sustainable food systems that improve nutrition and enable healthy diets?**

Integrated policies of food and nutrition, good storage, technologies and preparation, work on the whole food value chain.

What are your comments about the principles outlined in Chapter 2? Are they the most appropriate for your national/regional contexts?

Add: Marketing, and stability. For the women involvement: they mostly work as agricultural labors and do not own the land, other inputs and decisions, best management of resources, and good storage facilities, besides the huge quantities of surplus food not consumed can be managed by distribution of surplus food to the poor through some organizations and food banks, communications. All this can achieved by strengthening the linkages between the arms of the triangle (researchers, extentionists and producers), conflict affected areas with low food access have to be considered. Precaution measures can be taken towards soaring food prices especially for low income groups, also provision of production means to vulnerable farmers can support, Processing of nutritious food from local products for children will enhance the access of food.

**· 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?**

Integrated food and nutrition policies to find out underlying causes of malnutrition caused by food deficiencies, strengthening M&E systems to follow up and evaluate the implementation to find gaps and resolve the constraints,

**· 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?**

e.g. The new policies in Sudan has been conducted based on the four food security pillars . It is a comprehensive policy because it was formed by a committee including all relevant sectors. The institutional set up of food security and nutrition is chaired by the high level governor which makes it possible to link with decision makers. The main constraints are the lack of approved laws and legislations which managed the implementation of programmes and projects.

The ideal food system is that work in consideration of the value chain and strengthens the triangle.

## Danny Gotto, Innovative Technologies for Sustainable Future (ITSF), Uganda

Great job at the CFS policy. However, my contribution is in line with the issue of conflict and war. Data shows that malnutrition correlates well with areas struggling with conflict and wars. What policy measures can we include in this document that address issues of food and food systems in times of wars and conflict?

I also felt the aspect of access to technologies, resources are skewed to some extent on in developed countries. Can the policy pronounce itself on this issue? I know for instance some developed parts of the world have invented and protected their intellectual properties and yet these are so critical in addressing malnutrition, food production, etc in developing parts of the world. How do we ensure that these tools/technologies are accessible to all citizens of the world at a fair price if necessary?

I also feel the issue of gender in relation to nutrition & food system is so important in dealing with malnutrition. Is it possible to spell independently policy proposals that are critical in addressing the underlying gender interplay on malnutrition? I feel mixing it up in other areas may not bring it to the fore.

## Zoltan Kalman, Permanent Representative of Hungary, Italy

Contribution by Zoltan Kalman

Permanent Representative of Hungary to the UN Food and Agriculture Agencies in Rome

**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?**

Chapter 1 provides a comprehensive overview on the situation. However, among the causes of malnutrition the **reference to the root causes is still missing: poverty and inequalities**. It is a rather complex issue and would require a holistic approach and would also necessitate structural changes in our current food systems.

**One of the basic problems with our food system is the misconception of low food price policy.** The impacts of low food prices on the consumers' behaviour are significant, including their buying preferences. The situation of “low food prices” appears to be the result of competition among retailers and as such they seem to be positive and useful, favouring the poor people. In reality, all people, including the poor, suffer the consequences of this low food price policy, because low food prices regularly linked to low quality of food. These low quality, ultra-processed food (frequently with high fat, sugar and salt content, the so-called junk food) have serious consequences on the nutrition status of the poor populations, many times leading to obesity and overweight. Food prices are frequently kept artificially low; they do not reflect the real costs of production, ignoring the positive and negative impacts (externalities) of the various food systems on the environment and on the human health.

**For the decisions to transform our current food systems, true cost accounting is essential**, giving due consideration to all environmental and human health externalities. This could help shape the Voluntary Guidelines, recommend appropriate measures, policy incentives in support of sustainable solutions. There are ample scientific evidences related to the true costs of food and there are several studies available on this topic, for example http://www.fao.org/family-farming/detail/en/c/436356/; or <http://teebweb.org/agrifood/measuring-what-matters-in-agriculture-and-food-systems/>.

**In addition, artificially distorted, low food prices have a strong impact on the food waste as well. If food is cheap, it conveys the message that it does not represent a real value.** Therefore, consumers will care much less about it, they are throwing away food more easily. Higher food prices (reflecting the true costs of food) would discourage consumers to buy more than they effectively need. Realistic prices (reflecting the true costs) of food do not imply generally high food prices. Only the prices of those (ultraprocessed, junk) food would go up which do not internalize the environmental and public health externalities. Studies show that as a result of true cost accounting, prices of locally produced, fresh, healthy, unprocessed (whole) food would become more competitive. For the benefit of those who produce them, and in particular, the consumers and the whole society. Obviously, there would be the need for measures to provide decent wages as well, but these are necessary anyway to combat extreme poverty. In addition, the costs of these measures are much lower than the benefits of saving great amounts of public health care expenditure.

**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?**

**Guiding principle a) Systemic and holistic and evidence-based approach.** This is essential and it should include scientific evince of true cost accounting. Respecting the principles of sustainability is indispensable, paying due attention to the (so far neglected) environmental and social dimensions. Obviously, the economic dimension should also be considered. However, it should be kept in mind that **economic sustainability is nothing else but the result of the national and international "economic environment", in particular the financial policy incentives or subsidies**, promoting one or another type of food systems. In this regard, national legislators have enormous responsibility in providing the appropriate policy incentives to those food systems which are really sustainable.

**Guiding principle b) Coherent and context-specific policies.** Appropriate policies should include targeted measures to create an enabling economic environment for all stakeholders, with positive and negative financial incentives. These measures should be based on the above mentioned scientific evidence of true cost accounting and should address the power imbalances along the food supply chain.

**Guiding principle e) Nutrition knowledge and awareness.** This should include nutrition education starting with the youngest children at school.

**Guiding principle f) Realization of the Right to Food.** Reference to the root causes of hunger and malnutrition is missing: poverty and inequalities. Realization of the Right to Food is possible only if poverty and inequalities are adequately addressed.

**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 Chapter dedicated to shaping the Voluntary Guidelines, in particular paragraph 41 rightly provides a list of the cross-cutting factors and specific operational fields. As agreed earlier, the objective is to provide recommendations applicable and usable in practice, providing real help to Member States in their efforts to improve the nutritional status of their population. Therefore, it is important that **policy decisions to provide incentives to transform our current food systems, improve nutrition and enable healthy diets, should be based on scientific evidence. In this regard, it is indispensable to apply the true cost accounting concept**, giving due consideration to all environmental and human health externalities. See more reference above, under Section 1.

It appears evident again the lack of reference (in paragraph 43.) to the root causes of malnutrition: poverty and inequalities. In this regard, the first sentence of this paragraph should refer to economic affordability, in addition to food availability.

Several times in the document, including in sub-paragraph h) food fortification is mentioned. **Fortification can constitute a short/middle term solution against micronutrient or other deficiencies but should not be presented in the Voluntary Guidelines as a global solution for nutritious, healthy diet and sustainable food systems**. Fortification has an important role in emergency situation, but it should be considered only as a temporary solution in specific, fragile contexts and not as a final goal. The real, longer term solution should be the consumption of diverse, locally produced, nutritious food for a healthier diet, benefitting also the local communities who produce these food products. These products contain all nutrients, minerals, vitamins for a healthy diet; therefore, on the longer run there is no need for fortification. This should be made clear while shaping the Voluntary Guidelines.

In the same paragraph 43, a whole sub-paragraph (i) is dedicated to Climate change adaptation and mitigation. This area is extremely important but adaptation and mitigation measures alone are able to provide solutions only to some of the overall problems. **It is the concept of sustainability that fully includes the climate change adaptation and mitigation concerns and goes well beyond**, provides adequate responses to a number of other environmental challenges (biodiversity loss, soil degradation) and to social issues as well, like rural employment.

In **sub-paragraph j) Antimicrobial resistance** it would be appropriate to specify and add at the end of the sub-paragraph the need for **phasing out of use of antibiotics for animal growth promotion**.

**In paragraph 44 sub-paragraph a) Food losses and waste**: This paragraph should be complemented. **The main drivers of Food losses and waste (including low food prices and the policies of retail chains) are to be identified** and appropriate measures **should be** recommended.

Paragraph 46 refers to local markets. The Voluntary Guidelines should explicitly recommend establishment and promotion of local farmers’ markets. Short supply chains have a number of advantages like the supply of fresh, diverse food for a healthy diet to consumers. This paragraph also refers to the challenge of lower prices in supermarkets. The situation of “low food prices” is rather complex and therefore should be elaborated in more details. For further references, see above my responses related to low food prices, under section 1.

Under a) and b) of paragraph 46 the issue of true cost accounting could provide relevant inputs for the Voluntary Guidelines. Regarding food products high in fat, sugar and salt, the Voluntary Guidelines should recommend serious restrictions on the advertising and marketing.

**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 tradeoffs 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?**

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

The Voluntary Guidelines would be useful for governments and parliaments preparing/adopting appropriate legislation. It would be important to follow these guidelines by the other stakeholders (private sector, civil society, etc.) as well. FAO has a crucial role to give due consideration to these Voluntary Guidelines while providing policy advice to countries. (This would be important for all the other, previous CFS policy recommendations, guidelines and principles…)

## Ali Abdalrahman, Agriculture Research Center (ARC) ـ Agricultural Economics Research Institute (AERI) ـ Egyptian Ministry of Agriculture, Egypt

We asked to address four areas:

(1) The economic and policy conditions necessary to foster sustainable food and farm systems.

(2) The policy lessons and models from Europe and other countries that might help the Committee frame issues.

(3) Alternative agriculture and the value chain—making alternative agriculture successful in today’s economic structure; and, if time permits.

(4) The financial aspects of sustainable practices in the Midwest.

We will attempt to do this by organizing my remarks and Power Point slides according to the following topical outline:

* Alternative visions agriculture
* Policy options to support the sustainable agriculture vision
* Economic and related conditions affecting farming and food systems
* Value chain issues in fostering ecological farming systems
* Economic competitiveness of ecological farming systems
* More on economics of organic agriculture

A list of the major articles and reports used in preparing these remarks appears at the end of this written testimony. Many other sources drawn on indirectly are listed in the respective reference sections of those articles and reports.

Policy proposals for a nation’s food and farming system always rest on some vision for the system, whether or not the analyst or advocate recognizes that vision explicitly. Although there are many competing visions for the future of agriculture at this time, most of the visions underlying proposals for a new farm—originally to be enacted into law in fit roughly into one of the following two categories:

The global competitiveness vision—the recurring theme of policies proposed by those with this vision is maintaining and strengthening the competitiveness of agriculture in international markets. Individuals and organizations with this view have advocated agricultural policies intended to provide bases for successful resumption of World Trade.

Organization (WTO) negotiations under the current Doha Round. They also want agriculture to be on a strong footing to compete in an environment with reduced trade barriers and market distortions worldwide. This is an export-oriented vision, based on comparative advantage economic theory. Often implied in this vision is a agricultural system based on high-input, high-yield production of‘commodity’ crops.

The sustainable agriculture vision—This vision is more inward looking than the global competitiveness vision. The primary concerns of individuals and groups with this version are environmental quality, ecological sustainability, and the economic viability of small and moderate-sized family farms. Policy advocates with this vision are not anti-trade’, but they place greater emphasis on the ‘Jeffersonian’ idea of a nation populated by independent family farms and on natural resource use that is sustainable for the indefinite future. This vision has evolved in recent years to be very similar to the European Union multifunctionality view of agriculture healthy food has taken on much greater importance in this vision in recent years.

Policy options to support the sustainable agriculture vision my concern in this presentation will be with the sustainable agriculture vision. This does not imply that policies cannot sometimes support both visions. Groups representing both of these alternative visions of agriculture have advocated similar reforms in the system of ‘commodity supports’ in the new farm bill. (It does not appear that those commodity program reforms will be adopted at this time, however).

Policy options to support sustainable agriculture can be grouped in four categories:

Regulatory policies

Environmental compliance measures tied to agricultural and energy subsidies.

Environmental stewardship payments.

Markets for environmental services (‘payments for environmental services’)

We will briefly discuss each of these types of policies in terms of their roles in encouraging the adoption of more sustainable agricultural systems. Most of my focus will be on what it will take to induce more farmers to adopt biologically diverse farming systems—organic and other ecologically integrated systems.

The first step up from chemical intensive systems with little or no biological diversity are systems that incorporate somewhat more sustainable practices, such as reduced or minimum tillage or better fertilizer timing and placement. These practices can make particular farming systems—such as the Midwest corn/soybean system—more sustainable, or less unsustainable. However, it is very questionable whether systems that do not contain considerable biological diversity can keep agriculture in any given agro-climatic region truly ecologically sustainable over the long term. Therefore, I believe the challenge Systems Agricultural is to chart paths to achievement of whole systems in other words, transitions to much greater use of ecologically integrated systems.

Farmers weigh many goals in their choices of farming systems. However, especially relevant for policy analysis purposes are their net income (profit), risk reduction, and natural resource stewardship goals. Therefore, we need to keep those goals foremost in our minds as we assess different policy options. Various economic and related conditions—what I call contextual factors—condition the effectiveness of policy options. Foremost among these contextual factors are prices and access to markets, available technologies, the structure of agriculture, and the current stock of social and human capital.

We probably now are at a juncture where we need to seriously consider the use of more regulations for control of some types of agricultural negative externalities. Failure

The conceptual framework for analyzing the impacts of public policies on agricultural sustainability that we are using is depicted in Power Point slide number]to make large livestock systems pay their own costs of complying regulations was a major policy mistake, in my view. There may be other areas where we should also make somewhat greater use of regulations away from cost-share policies for nitrate contamination, and now relies on regulatory measures.

Environmental compliance measures. The environmental cross-compliance provisions of the farm bill have been valuable for helping induce adoption of some agricultural practices that reduce negative externalities and enhance natural capital. However, they are not comprehensive enough to induce system changes that would retain or bring about much greater biodiversity. The partial, but important, ‘decoupling’ of commodity subsidies in the farms did facilitate a movement of farmers away from continuous corn, where that practice remained, to the already widely practiced corn/soybean system. Although hardly diverse, the corn/soybean system is much preferable ecologically to continuous corn. With very high corn prices the last couple of years, however, we have seen some movement back to corn-following-corn.

There may be other ecological diversity minimums in other parts of the country that should be added to our Federal farm bill compliance provisions. Environmental stewardship payments. In contrast to regulatory measures, which are based on the ‘polluter pays’ principal, environmental stewardship payments, implicitly at least, are based on the ‘provider gets’ principal. In other works, providers of good environmental stewardship get rewarded. In reality, however, ‘good’ and ‘bad’ stewardship are really points along a continuum. Stated another way, the line that separates ‘positive’ from ‘negative’ externalities are subjective. Economics alone cannot specify that line. What deserves to be regulated and what deserves to be rewarded are up to societal decisions. Economics and other sciences, however, can help greatly in understanding the consequences of practical distinctions and associated policy responses.

The predominant approach to promoting greater ecological sustainability in agriculture up to now has consisted of environmental stewardship payments in various forms. The latest such stewardship payment program of conceptual significance is the Conservation Security Program (CSP), introduced as part the farm

## Kivumbi Earnest Benjamin, Heal The Planet Global Organisation-HTP, Uganda

Dear FAO;

As part of Heal The Planet Global Organisation - HTP contributions on your request regarding global food security allow me share on behalf of our organisation, allow us express our concerns on Genetically Modified Organism including seeds Several countries are rejecting. There is fear in this arrangement sighting health concerns, diseases and environment not forgetting the ability for soil to grow crops again.

We're advising this committee to take extra miles to listen to governments, independently conduct research and pay extra attention to organisations fighting for organic food products and secure agriculture.

Sincerely

## Fernando Vio, Instituto de Nutrición y Tecnología de los Alimentos (INTA) Universidad de Chile, Chile

*¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030?*

En los antecedentes me parece importante agregar las dificultades que se han tenido para detener la epidemia de sobrepeso y obesidad en el mundo, tales como las que señala The Lancet Commission Report ([www.thelancet.com](http://www.thelancet.com) Published online January 27,2019), que pueden resumirse en:

La obesidad está aumentando en todos los países del mundo en las últimas cuatro décadas y ningún país ha tenido éxito en frenar este aumento

Las políticas propuestas en los últimos 15 años por la OMS no han tenido éxito por la oposición y lobby de la industria mundial de alimentos y bebidas

No existe la suficiente demanda por parte de la población para enfrentar la obesidad, a diferencia de lo sucedido con el VIH/SIDA

No es un problema urgente y es dejado de lado por otros temas. Esta inercia existe, a pesar de los enormes costos en salud que significa la obesidad y diabetes

*¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?*

En primer lugar, el sistema alimentario mundial basado en la producción de cereales y de carne no es sostenible desde el punto de vista ecológico, lo cual va a ser agravado por el cambio climático que ya está afectando la producción a nivel mundial, especialmente por la falta de agua en el futuro cercano.

Desde la oferta el sistema alimentario está orientado a producir alimentos calóricos con alto contenido de hidratos de carbono refinado (harina de trigo refinada blanca, arroz blanco), grasas saturadas, azúcar y sal. En muchos países se ha pasado a la “dieta occidental” caracterizada por alimentos procesados, ultraprocesados y comida rápida (Monteiro, C.A., Cannon, G., Lawrence, M., Costa Louzada, M.L. and Pereira Machado, P. 2019. Ultra-processed foods, diet quality, and health using the NOVA classification system. Rome, FAO.).

Por el lado de la demanda, las elecciones de los consumidores están claramente definidas hacia los alimentos procesados y comida rápida por sobre el consumo de alimentos saludables como frutas y verduras, pescado, carnes magras, lácteos sin grasa. En la mayoría de los países el consumo de frutas y verduras es muy bajo en comparación al consumo de alimentos procesados y comida rápida, que se está incrementando en el mundo a pasos agigantados. Desafortunadamente, la demanda de alimentos poco saludables es mayor en los niveles socio económico bajos que en los de mejores ingresos, así como también el sedentarismo, lo cual hace que la obesidad sea mayor en los más pobres.

*¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?*

Estoy de acuerdo con los principios rectores. El problema es cómo se logra que estos principios rectores sean acogidos por cada país e implementados en las políticas públicas en el nivel local.

Todos estos principios rectores son el “qué”, en lo cual todos podemos estar de acuerdo, pero el problema hoy día es el “cómo”, que es el gran desafío actual.

*Considerando los ámbitos normativos identificados en el capítulo 3 y los factores propicios sugeridos en el párrafo 41 del borrador cero, ¿cuáles son los primeros pasos normativos que deberían analizarse en el capítulo 3, teniendo en cuenta la necesidad de fomentar la coherencia de las políticas y abordar su fragmentación?*

El Capítulo III me parece muy completo. Mi único comentario es respecto a la Parte 3: Comportamiento de los consumidores, punto 55. En este punto se trata muy someramente en el sub punto c) el tema de educación e información sobre alimentación y nutrición. Este punto es crítico porque la DEMANDA de alimentos va a depender en gran medida de la educación alimentaria y nutricional que tengan las personas. Esto se forma desde el embarazo y niñez más temprana y de la educación e información que tengan va a depender como se alimenten en la vida adulta (Hawkes C, Smith TG, Jewell J, Wardle J, Hammond R A, Sharon F, et al. Smart food policies for obesity prevention. Lancet 2015, 385: 2410-21). Hasta el presente, gran parte de las normas, políticas e intervenciones se han focalizado principalmente en la OFERTA de alimentos y no en la DEMANDA por parte de la población. Es así como se han privilegiado políticas de subsidios a los alimentos saludables o impuestos a los no saludables, el etiquetado nutricional y controles sobre la producción de determinados alimentos, dejando la DEMANDA a su libre albedrío.

La DEMANDA se forma con educación en hábitos y consumo de alimentos saludables desde edades muy tempranas y para ello los países deben tener políticas educativas en alimentación saludable muy claras, que en la mayoría no existen. Es por ello que debería enfatizarse la educación alimentaria y nutricional como algo central en los sistemas educativos formales e informales de los países.

¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?

**Nivel Nacional**

El sistema alimentario "ideal" debería tener a nivel nacional, en cada país, un Ministerio o Vice Ministerio o Servicio de alto nivel encargado del tema Alimentos, cuya misión fuese velar por las políticas de producción, distribución y consumo de alimentos saludables para la población, siendo responsable de contar con un sistema para la Inocuidad Alimentaria con la normativa y regulaciones adecuados que también se preocupe de la calidad nutricional de los alimentos que se producen y de cómo estos se distribuyen a la población.

Además debería contar con un Sistema de Ciencia, Tecnología e Innovación en Alimentos y ser responsable de la formación de Recursos Humanos calificados en Alimentos. De esta estructura deberían depender los programas de entrega de alimentos a nivel de embarazadas, lactantes y preescolares y los Programa de Alimentación Escolar.

**Nivel Internacional**

A nivel internacional, debería establecerse un Acuerdo Marco en Alimentos Saludables a nivel mundial, que al igual que el Convenio Marco contra el tabaco, obligue a los países a tener políticas y programas en alimentos que permitan, por una parte, fomentar la producción de alimentos saludables como frutas, verduras, legumbres, pescado, lácteos sin grasa, y por otra regule la producción y ventas de alimentos no saludables, como son los procesados con alto contenido de grasas, harina de trigo refinada blanca, azúcar y sal.

*¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?*

La directriz más importante debe ser que cada país formule una Política Alimentaria considerando todos los aspectos, desde la producción al consumo de los alimentos por parte de la población, con políticas y programas muy completos con el único objetivo de que la población se alimente en forma saludable. Para ello, promover a nivel nacional y mundial el mayor consumo de frutas y verduras es un componente fundamental.

## Blasco Nunez, Lumen Sapientiae NGO, Peru

*¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030?*

El Capítulo 1 muestra una relación causa efecto entre los factores que intervienen en la generación del problema y sus consecuencias, sin embargo, la complejidad del problema sugiere la necesidad de reducir el alcance de esa visión sistémica u holística, a una visión que esté centrada en áreas geográficas específicas, sobre las cuales se pudiera hacer mediciones más objetivas, las cuales permitirían implementar soluciones de impacto positivo inmediato. Trabajando en este nivel podríamos realizar Análisis de Causa Raíz sobre cada problema específico, teniendo en cuenta el entorno y el contexto, donde se originan los factores causantes de los efectos negativos que sean apreciados en cada caso en particular.

*¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?*

Los sistemas alimentarios tomados en conjunto, generarían un listado interminable de “problemas subyacentes”. En la búsqueda de soluciones podríamos seguir aplicando herramientas y conceptos sistémicos. Sin embargo, creemos que ha llegado el momento de hacer un análisis de sistemas. Identificar los procesos que generan las no-conformidades y llevarlos a nivel de procedimientos detallados. Sobre este nivel de detalle aplicar Root Cause Analisis para identificar las causas primigenias de cada problema y en cada lugar. Se trata de aplicar la conocida estrategia “divide y vencerás”. Enfrentar el problema en toda su magnitud sería un trabajo inútil, con pérdida de tiempo...y dinero.

*¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable?*

Para cuando se termine de elaborar las Directrices Voluntarias, la situación causada por el problema hambre-desnutrición será tan apremiante, que al mirar hacia atrás nos lamentaremos por todo el tiempo que hemos desperdiciado. Los principios rectores para crear un sistema alimentario-nutricional que sea efectivo (Eficiente + Eficaz) además de ser sostenible, DEBEN ser diseñados, implementados y gestionados por GENTE DEL SECTOR PRIVADO de cada país. Deben ser personas con profundo conocimiento de la realidad de sus entornos y contextos, de comprobada experiencia en el manejo del tema alimentario y principalmente, de sólidos principios y valores. Por allí deberíamos empezar y debemos hacerlo muy pronto.

*¿Qué opinión le merecen los principios incluidos en el capítulo 2?*

Los principios rectores para crear un sistema alimentario-nutricional que sea realmente efectivo y sostenible, tienen que ser diseñados, implementados y gestionados por gente con experiencia del Sector Privado de cada país. Consideramos que no es suficiente recoger opiniones de personas que - en algunos casos - no pueden exhibir conocimiento suficiente para opinar, sobre las causas y efectos de un problema tan álgido como apremiante.

*¿Son los más apropiados para sus contextos nacionales/regionales?*

Definitivamente no lo son. El mejor o mayor acercamiento apreciado hasta la fecha, es el publicado por IFAD en el trabajo titulado: “Nutrition-Sensitive Value Chains from a Smallholder Perspective: A Framework for Project Design” Autores: Isabel de la Peña, James Garrett, Aulo Gelli. Ese trabajo se sustenta en una apreciación muy cercana a la realidad. Sin embargo, una probable implementación del modelo, deberá enfrentar el grave problema de las carencias y/o deficiencias culturales y/o profesionales y/o laborales de los Smallholder participantes. Nuestra ONG Lumen Sapientiae ha elaborado un proyecto para utilizar la anchoveta peruana enlatada, como la base de una pirámide alimentaria sostenible a largo plazo. La anchoveta es el recurso pesquero más abundante sobre el planeta. Su calidad natural y contenido proteico superan al de otras especies similares de engráulidos, que son ampliamente consumidas en la Unión Europea.

*Considerando los ámbitos normativos identificados en el capítulo 3 y los factores propicios sugeridos en el párrafo 41 del borrador cero, ¿Cuáles son los primeros pasos normativos que deberían analizarse en el capítulo 3, teniendo en cuenta la necesidad de fomentar la coherencia de las políticas y abordar su fragmentación?*

En el caso particular de nuestro proyecto, el primer paso normativo sería reducir progresivamente el uso de anchoveta para hacer harina para alimentar animales. Establecer una fecha límite, para que la anchoveta sea orientada exclusivamente al consumo de los seres humanos del Perú y del mundo. En la actualidad, el primer país exportador de proteína animal, mira con indiferencia los estragos que causan el hambre y desnutrición en sus niños y pobres. Nosotros somos escépticos con respecto a “lo que podríamos esperar del gobierno de nuestro país”. No estamos seguros de que las Directrices Voluntarias podrían hacer cambiar la política pesquera del país. Los niños, que cada día sienten hambre y conviven con las secuelas de una desnutrición hereditaria, no quieren ni deben seguir esperando que su futuro dependa de pasos normativos. En un país donde las autoridades permiten que los niños tomen “agua blanca” por leche, el problema debe ser enfrentado con hechos y no solo con palabras.

*¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3?*

ONG empezó en el 2017 a trabajar un proyecto de desarrollo socio-alimentario para utilizar la anchoveta para lo que Dios la creó: Alimento de seres humanos. En el 2018 terminamos el perfil del proyecto y empezamos a buscar apoyo para llevarlo a nivel de ejecución, sin haber logrado obtenerlo hasta ahora. Es indispensable señalar que nuestro perfil de pre-factibilidad, es una aplicación de innovación adaptativa sobre un proyecto anterior, elaborado en la década de los años 70s. El proyecto original se denominó “Proyecto Sarveta”. (Combinación de las palabras sardina y anchoveta) Dicho proyecto era parte del Estudio Integral de la Pesca, elaborado por la Corporación de Racionalización y Consultoría. En la elaboración participaron varias empresas consultoras de prestigio internacional. Se contó con la asistencia técnica de expertos noruegos, suecos, ingleses e irlandeses, los cuales fueron asignados al proyecto, por la delegación de FAO en el Perú. Se construyó una embarcación con el nombre “Sarveta”, para realizar las pruebas de pesca selectiva de anchoveta, que validarían los objetivos supuestos por el proyecto. Los objetivos de pesca selectiva de anchoveta fueron validados y verificados. Sin embargo, el proyecto se abandonó, supuestamente por “razones políticas”. versión actual del proyecto es un modelo sistémico diseñado para Gestión por Procesos, en el cual hemos recogido las valiosas experiencias anteriores, las hemos innovado y actualizado aplicando tecnología vigente. Por todo lo expuesto, la implementación y operación del proyecto no reviste riesgo alguno. La puesta en operación marcará - sin duda alguna – el inicio de la solución del problema del hambre y desnutrición en el país.

*En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?*

En la ONG Lumen Sapientiae somos expertos en Gestión de la Calidad Alimentaria. Somos Consultores para Standards Alimentarios de GFSI. Esta condición es una fortaleza para el proyecto, porque hemos podido identificar las No Conformidades existentes dentro de la Secuencia de Agregación de Valor de anchoveta enlatada. Hemos diseñado y definido las Acciones Correctivas para eliminar las No Conformidades existentes. Hemos prediseñado la Nueva Cadena de Abastecimiento de Anchoveta Enlatada en el Perú. El proyecto estará en condiciones de proveer, un producto pesquero que reúne dos cualidades esenciales: Alimentar y Nutrir. Es un producto apto para llegar y ser consumido en las poblaciones más alejadas. Tendrá un precio por debajo del promedio de sus similares importados. Contará con la Certificación de Calidad Alimentaria Internacional, bajo el Standard BRC Food - Issue 8 - 2019.

Diversos aspectos de nuestro proyecto coinciden con los lineamientos expuestos en el trabajo de IFAD titulado: “Nutrition-Sensitive Value Chains from a Smallholder Perspective: A Framework for Project Design” Autores: Isabel de la Peña, James Garrett, Aulo Gelli.

*¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?*

Con el mayor respeto, nos permitimos insertar una pregunta dentro de nuestra respuesta: ¿Qué ocurriría si el CSA comprobara la factibilidad total de nuestro proyecto (Originado con apoyo de FAO) y lo presenta entre las Directrices Voluntarias, ante el gobierno peruano?

No vamos a pretender que conocemos a priori la respuesta a esta pregunta. Sin embargo, este podría ser uno de esos casos de excepción, en los cuales la solución de un grave problema social está al alcance de la mano, pero los intereses de diversa índole, podrían pesar más que la racionalidad de una decisión inteligente, humana, solidaria y moral, pero que requiere de gran valentía para ser tomada.

ONG Lumen Sapientiae. [www.lumenperu.org](http://www.lumenperu.org)

Blasco Núñez Velasco.

Modelo de desarrollo

Diseño de la cadena de abastecimiento de anchoveta enlatada para Elevar su consumo y reducir el hambre y la desnutrición en el Perú<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/FAO%20FSN%20FORUM%20-%20MODELO%20DE%20DESARROLLO%20-%20PROYECTO%20ANCHOVETA%20-%20MAYO%202019.pdf>

## Ali Abdalrahman, Agriculture Research Center(ARC)ـ Agricultural Economics Research Institute(AERI) ـ Egyptian Ministry of Agriculture, Egypt

Sufficiency Economy is a philosophy that guides the livelihood and behavior of people at all levels, from the family to the community to the country, on matters concerning national development and administration. It calls for a ‘middle way’ to be observed, especially in pursuing economic development in keeping with the world of globalization.

Sufficiency means moderation and reasonableness, including the need to build a reasonable immune system against shocks from the outside or from the inside. Intelligence, attentiveness, and extreme care should be used to ensure that all plans and every step of their implementation are based on knowledge.

At the same time we must build up the spiritual foundation of all people in the nation, especially state officials, scholars, and business people at all levels, so they are conscious of moral integrity and honesty and they strive for the appropriate wisdom to live life with forbearance, diligence, self-awareness, intelligence, and attentiveness. In this way we can hope to maintain balance and be ready to cope with rapid physical, social, environmental, and cultural changes from the outside world.”

This philosophical statement has lent itself to interpretation by diverse groups of people. First, we can dismiss outright the extreme interpretation that the Sufficiency Economy means complete self-reliance or autarky. In an autarchic system, a country or unit thereof relies upon itself and its people to produce all its needs with no dependence on others.

It may do this voluntarily (cutting off contacts with the outside world) or by necessity (because it is incapable of generating those contacts). But His Majesty the King explicitly rejected this interpretation: “This self-sufficiency does not mean that every family must grow food for themselves, to make clothes for themselves; that is too much. But in a village or sub-district there should be a reasonable amount of sufficiency.

If they grow or produce something more than they need they can sell them. But they do not need to sell them very far; they can sell them in nearby places without having to pay high transport costs.”

Food Subsidy

The subsidy is an important part in the system of social spending, which aims to ensure that members of the community on their needs of basic goods and services such as food, health, education, transport, water and electricity, is a program of nutritional support of policies that ensure the state in order to improve the nutritional status of individuals and ensure food security for them and eliminate the problem of hunger, and it was total support center to support the food even arrived in some years to 90% of the total value of support, and the program is aimed at nutritional support to the provision of basic commodities at affordable prices are in affordable for low-income classes to ensure that a minimum of food necessary for the poor to stabilize the prices of goods in order to match the wages, and thus leads to the kind of redistribution of income and improve the pattern of distribution and social justice, and improve food security.

The subsidy programs, food for the benefit of consumers are common in many countries, and provides these programs are many benefits to consumers, so the financial cost of this type of nutritional support of matters of interest to policy makers and decision makers, and usually support programs high cost.

Where the government has time as the organization of the provision and distribution of food commodities necessary to individuals at prices relatively low in order to take into account the social dimension, and this support includes the support of direct and indirect, and subsidy includes food and non-food, and the state allocates annually in the general budget State provision of social spending, which includes:

* Subsidy for basic commodities such as food, medicines and slides of the initial consumption of electricity, drinking water and petroleum products and LPG and natural gas.
* Subsidy services include subsidy for cooperative housing and public subsidy for rail and other means of transport, subsidy for treatment at the expense of the state and health insurance and medical insurance for students, subsidy university students, subsidy lending public, cooperative and slums, subsidy services, religious and youth.
* • Subsidy for the agriculture sector by lowering interest rates, and increase the price of the supply of cane sugar.
* • Subsidy for social insurance by opening the door of the pension does not host them and pay the deficit in the pension funds and increase the number of uninsured.
* • Subsidy is dedicated to the integrated development of villages, and is spending on these services as a real entry added to the entry of individuals and on their behalf the State bears the costs of such services.

The alternatives to the reform policies of food subsidy:

System is a food subsidy is an integral part of government policy long term to achieve food security policy and achieve social justice, and thus achieve political stability, although the state has made progress in reducing the cost of the subsidy system, but the absolute costs of the system is still high, so the state is trying to reform the subsidy system towards improving the targeting of the poor and increase their access to subsidy and improve the effectiveness of cost management system, and when studying the options of policy reform, it is important to balance the state the benefits of each option and costs, in addition to taking into account the benefits and costs of supporting the political, social, and because of the inherent system of the current subsidy of the politically sensitive care, it is necessary to study alternatives for change, taking the political implications of each choice.  
The subsidy program for food with a good target beneficiaries, will lead to improvement of real incomes and improve food security of the target groups without the benefit of this subsidy is not needed, the leak of the subsidy increased costs and decreased cost-effectiveness of these programs.

There are several options for direct food subsidies to those who deserve it and blocked for non-eligible, and these options are:

Option indirect which mean self-direction, and direct administrative guidance.

It occurs when the self-oriented benefits are available to all, but the course is designed in a way that only makes the poor tended to participate.

The systems are self-directed support food attractive because it reduces management costs, which do not need to be a large administrative apparatus to determine entitlement to benefit.

They are also politically acceptable ways to direct subsidies for food, because participation depends on the free choice of the individual and not on the occurrence of selection upon by a governmental entity. It also requires direct targeting of the administrative definition of the poor, and there is a quantitative approach to estimate the low-cost households, which is known as alternative test averages (Proxy Mean Test), which depends on the indicators are high, and thus lead to improved rates of targeted subsidy for the poor.

The subsidy of the food is not just a technical issue, but it is the subject of political implications as well. We have been efforts to reform the food subsidies directed to those who deserve better and reduce costs for fear of civil unrest.

That is why I have to policy makers and decision makers to take into account the political implications of what is to be made of the decisions when thinking about the reform of food subsidies.

The experiences of the past to study the importance of the following steps when considering the reform programs in support of food:

Adopt a gradual approach in bringing about change in the system of food subsidies, Organize public awareness campaigns to prepare the population for the justification and the need to reform

The application of some compensatory measures for groups that are exposed to some of the adverse effects of the reform programs of subsidy.

This approach aims to improve food security, and comes through:

The study of policy alternatives to increase food availability in the context of ongoing changes in local and global markets.

Develop policies to improve opportunities for households to obtain food in the framework of policies, market mechanisms and economic reform programs.

Analysis of the nutritional aspects of food security in terms of the biological advantage of food, and to identify the factors affecting the nutritional status.

Analysis of the food security situation within the household in terms of individuals most vulnerable to food shortages and methods of care, and therefore can be replaced other goods subsidized food to achieve household food security, according to desire these families and by geographic region, has this is costly in financial terms, but it will help to improve food security.

Identification of micro-nutrient deficiencies (iron, zinc, iodine vitamin A), and explore ways to improve the status of micro-nutrients through the addendum, or through plant breeding and genetic improvement.

## Ali Abdalrahman, Agriculture Research Center(ARC)ـ Agricultural Economics Research Institute(AERI) ـ Egyptian Ministry of Agriculture, Egypt

It is considered of food security policies one of the most world active, which has an effective role and activist, and in the activation of certain policies, food security, through studies, research and food security projects in the world.

Where" Food security exists when all people at all times to access, both physical and economic adequate food , safe and nutritious food to meet dietary needs and food preferences Kate has an active and healthy life."

Implicit in this definition is the recognition that food security is a multi -dimensional, and there have been many formulations of what the components of food security, for example , identified CFS four key dimensions or " pillars":is to ensure the availability of , if not the production of sufficient quantities of materials food and ensures access to all the families and all individuals within those households have enough resources to get the proper foods(through the production , purchase, free). And ensure a nutritious diet. Use when the human body is able to absorb and metabolize food.

Diet nutritious and safe, biological and social environment adequate, and appropriate health care to avoid diseases help to make adequate food. Is to ensure stability is maintained when the three pillars of the other with the passage of time.

It has been noted by many experts on the need for a column on environmental sustainability, where patterns of production and consumption of food does not deplete natural resources or the ability of the agricultural system to provide enough food and supports many of all countries to support the financial year, prices of basic consumer goods, which support was introduced at an earlier stage back until World War II , but he skipped several attempts to fix it, and since then has taken attributes benefits Permanent. The targeted programs are rare.

By increasing financial support for food prices, and the imposition of price controls, and the reduction of exports, lowering import tariffs: for example, has been in some countries lowering tariffs on wheat to about zero, and has also been paying financial support for importers, while allowing others preferential import wheat from different countries. In some countries, have increased wages and salaries to help consumers overcome the effects of rising prices.

The question now is:

Does the rise in food prices to create some opportunities in the long term? Most of the poor are rural, and can rise in food prices when its continuation for years to help increase the income of the poor in rural areas and mobilize the economy.

The supply of food emotive issue, so countries in the region feel a real concern about food security.

The rise in prices could help accelerate the increase of productivity and increase local agricultural production. However, the issue of water is scarce in some areas, which requires governments to take action to help increase the efficiency of water use as well.

This means an increase crop yields by the unit of water. An increase in domestic production to help protect countries from the vagaries and fluctuations in commodity markets. But countries in the region also will need to continue to rely on imports and on global markets in order to ensure the supply of food.

They should strengthen their capacity to use: futures markets, options, futures, and other modern tools in order to help meet the needs of food and hedge against the risk of the supply side.

Governments of developing countries better to encourage small-scale agriculture in the new global environment, and what form of special and differential treatment may be required to allow them to do so?

"In many cases, the reforms have been achieved" successful"is not in isolation, but as a result of the implementation of policies associated with them. In drawing lessons from the reforms that are seen benefiting groups of food insecurity, or which say the least, and you do not have disadvantaged them, so it is important to identify complementary policies that facilitated the process of adaptation to more productive activities, and any countervailing policies that act to mitigate losses transitional groups is safe and has only faced a clearer understanding of the effects that are often obscured from trade reform on food security is therefore vital if the drivers of further reform to lead to changes for the benefit of disadvantaged and vulnerable groups in poor countries.

It is acknowledged that reforms in sectors other than agriculture, it could have implications far more important both in terms of poverty reduction, through changes in income levels, and food security. It must focus on the agricultural sector and the impact that could be trade reform in its ability to contribute to the improvement of food security in the context of broader structural changes that result from the reforms.

This focus justified by explaining the multiple ways in which agriculture, which they can identify and promote national food security of households. While any trade agreement that alters the balance between trade liberalization and the protection of the particular good or service in the economy, can affect the levels of food security, reform of the relevant agriculture is particularly important for the following reasons:

(1) Agriculture is one of the central contributors to food security in most developing countries; both through its direct contribution to the availability of food, and indirectly as the main engine of economic development and thus improve access to food.

(2) Agriculture is one of the sectors most heavily distorted in many countries, and it has, as a result, has received considerable attention in recent rounds of trade negotiations.

Recommendation :

Need to be food security policies more dynamic and not static, the increasing global variables such as climate change, and changes in dietary patterns, and human behaviors rapidly, in addition to changes in the compositions crop, which requires change, food security commodities.

Phase that they key issues in food security policies and sustainable development policies.

To be involved in civil society organizations and media awareness programs on food security issues in the various communities, in coordination with international institutions and local government and the private sector.

Attention to some other hubs in addition to the main axes of food security, such as:

1. Coordination and integration with the institutions dealing with food security policies, whether domestic or international, and the involvement of civil society organizations.

B. Emphasized that there should be an infrastructure in order to maintain a sustainable food security.

2. Emphasis on tightening the control and inspection of markets by all means possible.

3.The involvement of community members in the development of alternatives to the goods of food security in line with the changing desires of individuals.

4. Controls critical to the operations of the various monopolies, and the reduction of high food prices, both in the case of goods imported or locally produced food.

5. Giving civil society organizations and a strong role in the control of certain markets food security.

6. Seize opportunities to achieve sustainable food security.

H. Emphasize transparency in the implementation of various food securities.

7. The fight against corruption in all images in the application of food security policies, in order to reduce the effects of poverty, hunger and disease.

Critical review of what is known from existing literature and other resources in order to facilitate better targeted research and analysis of developments in trade and food security at the national level.

To provide a conceptual framework for understanding how trade liberalization and economic reforms relevant could affect the national food security at household level.

Provide a practical framework for evaluating the results of previous policies, and to predict the outcome of future initiatives, at both the national and the food security of households.

Prevent unhealthy foods, or rationalization of consumption, or imposition tax them, or provide cash support for more nutritious foods, put laws regulating the work of the manufacturers, awareness to individuals about these foods .

Address the problem of food waste, which is now one of the problems most prevalent in the community, the depletion of natural resources scarce , and environmental costs and the serious economic and social, and there are many effective ways to reduce food waste, which can result in cost savings and environmental benefits in order to create sustainable food system .

## Harriet Kuhnlein, McGill University, Canada

Comments are submitted according to topics in the Elements Paper from CFS Policy Convergence Process. I am especially concerned that Indigenous Peoples’ food systems require unique considerations and need to be addressed in the Voluntary Guidelines. Therefore, there needs to be 4 classification groups: Traditional food systems; mixed food systems, modern food systems, and Indigenous food systems. Indigenous food systems are characteristically based in biocentric approaches that must be considered in the guidelines that are currently written as anthropocentric considerations. This is important in our current food production status within climate change and the climate crisis; it is important to consider Indigenous approaches to food systems that foster sustainability, resilience and adaptability that depend on the health of the natural resource base of the planet.

1. Food Supply Chains

a. Production systems.

It is important to consider food generating activities from the natural resource base that are not “mass produced by agricultural technologies” such as local small-scale indigenous technologies. Unique indicators and metrics are needed, such as “biodiversity variety and micronutrient richness” per surface area. Energy neutrality in food generation is another indicator that needs to be developed.

b. Storage and distribution

Unique storage and local distribution systems need to be considered that are based on indigenous values of sharing and well-being. These should also take into account provisioning of natural medicines that are also foods, cultural and spiritual resources provided in the natural land base that also generates food.

c. Processing and packaging

Consider how processing and packaging can be reduced with greater local distribution and use of food.

d. Retail and markets

Include Indigenous Peoples in policies to shape retail and market use of local resources. Give credit and address and resolve fair intellectual property rights of unique resources (including seeds) known and protected by Indigenous Peoples.

Ensure that retail markets provide healthy foods to Indigenous areas.

2. Food Environments.

a. Availability and physical access (proximity)

Protect the rights of Indigenous Peoples to their traditional territories. Provide incentives for Indigenous Peoples to provision their local communities with healthy foods. Always address the Right of Indigenous Peoples to Free, Prior and Informed Consent in developing food markets.

b. Economic Access

Address trade policies in the local circumstances of Indigenous territories and farmers, and their values, before and during development of national policies.

c. Promotion, advertising and information

Provide education in the local languages of Indigenous farmers and communities about healthy food options that include their local products. Include Indigenous food knowledge in school curricula.

d. Food quality, safety

Provide education on food safety. Consider Indigenous technologies for keeping food safe.

3. Consumer Behaviour

a. Food and nutrition education

Include Indigenous Peoples in developing local education strategies, dietary guideline development, and social protection programs that improve nutrition. Address Indigenous values and preferences.

b. Be aware that Indigenous values may be independent of other “traditional” values within a region or country, and address these respectfully.

4. General Comment

Include the United Nations agencies that address Indigenous Peoples in all activities of the CFS, and especially in the development of these Voluntary Guidelines on Food Systems and Nutrition.

## Nihal Destan Aytekin, HarvestPlus/IFPRI, United States of America

**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?**

Yes it does – however it would be advisable to draw attention to the urgency of the issue; given that the guidelines will be released later in 2020 – by when there will be only 10 years left for meeting the 2030 SDG targets; five years to meeting 2025 WHA targets and we will be already five years into the UN Decade of Action on Nutrition. Therefore, the urgency of following these voluntary guidelines cannot be emphasized enough.  Moreover, SDG2 underlies several of the other – if not all – SGDs; therefore, achieving the SDG2 targets is crucial for the achievement of all targets.

Other important points that can be included regarding the current situation of malnutrition as follows;

- According to the latest SOFI (2019), over 820 million people suffer from hunger, corresponding to about one in every nine people in the world. This figure which has been stable or even increasing (depending on the region) is alarming as it means we are moving further away from reaching the SDG2 targets. The same report also stated that over 2 billion people do not have regular access to safe, nutritious and sufficient food  - that is one in four people [Ref]; Moreover over 3 million deaths (children under five) related to malnutrition with maternal and child undernutrition contributing to 45 percent of deaths in children under five [Ref] ; around 2 billion people suffer from micronutrient malnutrition [Ref].

- Non-communicable diseases (NCDs) are on the rise and are estimated to cause almost 75% of deaths around the world. One of the major causes of NCDs is unhealthy diets and malnutrition [Ref].

**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?**

Climate change adaptation and mitigation is mentioned on page 11. However, these overarching guiding principles (on page 8) could also include a principle on adopting climate-smart approaches/interventions, that would abate or alleviate the negative impacts of climate change not just on the availability of food but also on the quality of food.  Recent evidence shows that by 2050, the increasing CO2 concentration will result in many crops – in particular, staple crops – grown under such conditions losing their nutrition levels by 3–17%. This increase in CO2 concentration could cause an additional 175 million people to be zinc deficient, and 1.4 billion women of childbearing age and children under five who live in countries with greater than 20% of anemia prevalence would lose >4% of dietary iron intake [Ref].  Therefore, technological solutions (such as micronutrient enriched, biofortified staple crops) and policies for adopting these should be encouraged.

**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?**

Potential policy entry points include:

- Food-based nutrition interventions such as fortification – included under “processing and packaging” and biofortification included under “production system” are both proven to be cost-effective and scalable interventions for improving micronutrient intake.  They are also equitable (corroborating with point 11) since staple foods are consumed by all members of a family – regardless of age or gender – unlike other nutritious foods (such as animal source foods which may be allocated to male members).

- Rural smallholders – as both producers and consumers of food – are vulnerable to malnutrition. Their inclusion was highlighted in the previous CFS recommendations, but they seem to be missing from these guidelines. Given that the majority of the food in developing countries is produced by smallholders, and that majority of the population in developing countries reside in rural areas, rural smallholders could be centralized for policy entry points. Potential policies could include subsidized seeds of improved, nutritious varieties of crops (such as biofortified crops), linking smallholders to public food procurement.

- On page 10, under the policy-relevant areas, biofortification could be given as an example of sustainable and nutrition-sensitive agricultural production models.  Globally 21 countries have now included biofortification in their national policies [Ref]. For further evidence on biofortification see here.

- On page 12, under Handling, Storage and Distribution heading, practices, and technologies to retain and/or add nutritional value can be included among the policy-relevant areas.

- On page 13, biofortification could be included under the Supply of Nutritious Foods heading:  Policies pertaining to input access/availability, extension services, and incentives (e.g., tax breaks or subsidies, guaranteed procurement schemes) could be implemented to stimulate the production of nutritious biofortified staple crops.

- Agree with the sentence “Actions should be taken to make nutritious food affordable for all population groups” on page 15. Since the poor don’t tend to have access to diverse, healthy diets and since most of the calories consumed by the poor come from staple crops, improvement of these staple crops to delivery other nutrients (such vitamins and minerals) through biofortification or fortification, is a low hanging fruit for increasing the nutrient intake of these populations.

- On page 17, under food quality improvements title, biofortification can be included alongside fortification as another evidence-based cost-effective and scalable intervention for improving the nutritional quality.

**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?**

- One promising tool for improving food systems through their main building blocks (i.e., staples) is the substitution of conventional staple crops with their biofortified (i.e., enriched with micronutrients by using conventional plant breeding methods) counterparts.  Biofortification is a low hanging fruit that requires minimum behavior change; is cost-effective and has been proven to improve not just nutrition but also health outcomes [Ref].

- With regards to challenges, constraints, and trade-offs, the reciprocal relationship between climate change and farming practices, urbanization, disparities, and equity issues and equitable distribution and access to food and technology are the prominent ones.

- An ideal food system should be sustainable, resilient, equitable, and climate-smart throughout a productive whole value chain, that contributes to biodiversity, environment, and it should promote improved health and nutrition for all.

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

- Agree with the principles explained in Section IV. Specifically, the forum mentioned in paragraph 59 would be very helpful for the stakeholders to learn best practices from each other.

- In addition to these principles, it is important to have the guidelines referred to/endorsed by important international platforms such as G20 where commitment/buy-in by national/multilateral leaders could be ensured.

## Mitchell Kanter, Global Dairy Platform, United States of America

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.

*5. 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

Attachment: <http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Zero%20Draft%20Review%2081.docx>

## Marzella Wustefeld, WHO, Switzerland

Please find below the comments provided by the World Health Organization’s Department Nutrition for Health and Development (WHO/NHD) in Geneva to the Online consultation on the CFS VG on Food Systems and Nutrition.

**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?**

The CFS VG on food-systems and nutrition are of high importance for the UN Decade of Action on Nutrition, and for achieving food security, improved nutrition and health and other related SDG targets. The added value needs to be to go steps further with the operationalization of the agreed ICN2 Framework for Action.  Moreover, these voluntary guidelines need to build on and integrate the guidance adopted by other member state bodies of the UN system. This includes also the integration of relevant World Health Assembly guidance into the broader multisectoral context for enabling sustainable food systems supporting healthy diets and improved nutrition and health for all.

For the achievements of the global commitments and targets, we would like to underline for chapter 1, the importance of calling for an integrated approach to food systems from farm to folk. Too often, contrasting policies are observed, which are not achieving the intended outcomes of addressing all forms of malnutrition. An integrated approach from farm to folk is vital to avoid policy incoherence, and to ensure that policies included in the agricultural element are followed through in the different steps of the food supply chain, particularly around the elements of food distribution and retail and consumer policies. In addition, we would support the establishment of global policy targets in order to make that alignment; the CFS might consider establishing targets for the achievement of the overarching targets of addressing malnutrition in all its forms. (see also point 4).

For this section, an essential element is the inclusion that unhealthy diet is the top risk factor for the global burden of disease. The concept of healthy diet should be central to these voluntary guidelines. In fact, the latest analysis that looked comprehensively at the outcomes in terms of disease, the Global Burden of Disease Study, indicates that unhealthy diet is now the top risk factor for the global burden of disease. It accounts for 11 million death every year. This is a substantial element. The Global Burden of Disease Study is the most comprehensive worldwide observational epidemiological study to date, that assesses mortality and disability from major diseases, injuries, and risk factors to health. We would like to underline the importance of this study result for the CFS voluntary guidelines and suggest that it is reflected in the Introductory part 1 of the document. Furthermore, we would like to stress the importance that the Committee (CFS) looks at the concept of healthy diet as a guiding element for the discussion.

**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?**

Healthy people and healthy planet are key elements, and we do welcome the inclusion of the ‘healthy people – healthy planet’ concept among the guiding principles. In deed health objectives could be an overarching factor and an aligning factor for food and nutrition policies. Currently, food systems deliver in an inadequate way on their core-business which is to produce and provide the necessary food and nutrients for the population. Health of the population and health of the planet as key elements drive the food system transformation, and they should be placed more important than other aspects such as for example considering the food system as a production system of commodities only. We would like to suggest that this ‘healthy people- healthy planet’ element might be highlighted even more as a key driver to avoid policy incoherence.

In Section 2, we welcome the inclusion of the definition on ‘Healthy diet’, including the healthy diet of infants and young children (page 7). Moreover, we would like to inform the CFS Secretariat that WHO is collaborating with FAO and both agencies jointly organized an expert consultation on the topic in July 2019. This consultation looked at diet from different entry points: including health, affordability and sustainability. The objective of the Consultation was to develop guiding principles around what constitutes a sustainable and healthy diet, to be further translated into clear, non-technical information that can be used by governments and other actors in communication and policy-making. The guiding principles will be shared with the CFS and will certainly contribute to the development of the CFS VG. The proceedings of the Consultation will be published as well.

**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?**

Overall, the right policy areas are highlighted in the document. A missing element is that the document does not provide sufficient reflection on how those policy areas outlined in the document should be shaped. Certain policy areas could go into complete different directions from the intended targets, and therefore, more clarity should be included on each policy area.

We would like to suggest that the policy areas could be organized around broad policy goals and the policy measures along the food supply chain.  For example, the existing challenges on enabling healthy diets could be taking as a starting point:

Clearly one challenge is the availability and affordability of fruits and vegetables to the world population. Using an approach that addresses the question which different measures are required to address this challenge (which could be formulated as a global target), more clarity could be provided for the future user of the Voluntary Guidelines.

Another example could be the existing global problem over the supply of fats and oils for human consumption. The question to be addressed could be, what types of policies are required to increase the availability of healthier fats and oil and their production compared to the existing ones that currently are expanding; and to do this in line with the global target on the elimination of industrially produced trans fats or the target on the reduction of saturated fats in our food supply.

To address these and other challenges, which could be formulated in terms of global policy goals, clearly will require an alignment of consumer policies, industrial policies, food reformulation policies, research and agriculture policies. We would like to suggest that the CFS Secretariat considers to be more explicit about what the VG are trying to achieve. In addition, regional specific goals and targets may be considered.

**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 policy-making?**

With regard to targets, we would like to suggest the establishment of global policy targets. In order to reach alignment between the different policy areas, the CFS might consider establishing such global policy targets that should be designed to achieve the overarching targets of addressing all forms of malnutrition. One step in that direction would be to clearly state the objectives for each policy mentioned in the document. In this way, the formulation of the policy would be more easily understood by countries for relevant implementation. CFS might help the global community and countries in providing these essentials. Without such an analysis of how a particular policy element contributes to reaching overarching targets of addressing all forms of malnutrition, the different sub-sections in Part 3 of the document, the way they are presented, could appear to be fragmented and disconnected. There is a call on countries to address this matter when they plan to use the voluntary guidelines, but CFS is well positioned to help in providing the key elements around which integrated food and nutrition policy planning might be done.

On specific policy measures we would like to share the following comments:

Regarding the food environment, WHO is currently conducting systematic policy reviews on four areas: Marketing of food to children, Labelling policies, Procurement of food in public institutions, Fiscal policies. The outcomes of this work might support the provision of evidence-base for certain policies. Moreover, some of these policies might require some broadening with reference to the current wording in the document. For example, on marketing we strongly recommend that the whole of marketing policies is considered, and that the document stays broad as it is now and is not limited to one element like the marketing to children. Equally important are the marketing of breastmilk substitutes and the marketing of foods for young children as significant public health components.

On food quality and safety: we would recommend not having a specific item but rather have it as cross cutting element that should be present in multiple policy areas. Moreover, we observe inconsistency in placing food safety in the document:  food safety is mentioned in Farm-to-school Programmes but not elsewhere in Production Systems, is mentioned in Handling/ Storage/Distribution/ Processing/ Packaging but not in Retail/Markets, and is totally absent in Consumers Behaviours section while the final preparation of food is particularly important for food safety including in informal sectors (street-vended foods). Food safety is an integral part of food security and nutrition; therefore, its actions should take place along the entire food chain.

On the food environment, and particularly on the economic access component: -  We would like to suggest more specificity around the nutrition-sensitive trade policies, and to mention the need to consider nutrition impacts of trade policies. We also would like to suggest the inclusion of import policies as a measure to shape the food environment.

Regarding the fiscal and pricing policies -  When it comes to pricing policies, we would rather suggest to use the term ‘economic measures’ and to not just consider taxation as the only measure. A broader concept would be more adequate that includes besides taxation also the management of subsidies, which is an important and critical element in the way food availability and the price of food are shaped.

The informal food sector -  has a role to play in many parts in Asia and also in urban areas in Africa and elsewhere. In many low-income countries, the informal food sector is comprised of street and market food vending. Given its importance for a huge number of people in the world and often the most vulnerable, we suggest including policies that address the nutritional value and safety of food produced in the informal sector, under the section on food environments – availability and physical access.

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

There are multiple actors involved in food systems at all levels.  Under this point, we would like to suggest including the need for setting up rules of engagement to strengthen transparency and accountability. As addressed in the HLPE report on Multistakeholder Partnerships, this includes identifying and acknowledging possible tensions, power asymmetries and conflict of interest among partners; developing appropriate support tools to address these, and defining clear roles and responsibilities of the different partners. We consider it important to address the rules of engagement in chapter 4 of the document.

The UN Decade of Action on Nutrition as an implementation mechanism for the VG. The discussion of the VG might inform the workprogramme and the commitments for the second half of the Nutrition Decade. We would like to suggest that the Nutrition Decade is mentioned as a means to follow up and implement the VG.

FAO and WHO are preparing for the Mid-term Review of the Nutrition Decade to lead to an event in 2020. The main objective of the Mid-term Review will be to identify existing gaps and set priorities for the second half of the Nutrition Decade. The CFS VG play an important role in identifying these priorities with regard to food system action and guiding countries in further operationalising the relevant ICN2 Framework for Action recommendations. More information on the Mid-term Review are available at this link

<https://www.un.org/nutrition/sites/www.un.org.nutrition/files/general/pdf/concept_note_for_nutrition_decade_mid-term_review_rev_130619.pdf>

WHO looks forward to continuing working closely with the CFS Secretariat and all partners involved in this process.

## David Cuming, Permanent Mission of Canada to the Food and Agriculture Agencies of the U.N., Italy

Please find attached Canada’s input to the e-consultation for the CFS Voluntary Guidelines on Food Systems and Nutrition.

Best regards,

David Cuming

**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?**

Chapter 1 provides a good summary of the current situation of malnutrition, providing a succinct overview of related causes and impacts. A few suggestions:

**Paragraph 3: Micronutrients**

Elaborate on the consequences of iron deficiency (i.e. decreased productivity, negative birth outcomes). Further, mentioning iodine, folate, zinc, and vitamin A deficiency would be important here as well, as deficiencies in these micronutrients remain significant at the global level.

Micronutrient deficiencies are a key challenge that affect a large proportion of the population with serious consequences on human health, well-being and development. Children under five**, [adolescent girls,]** women of child-bearing age, and pregnant women are particularly at risk of being affected by iron deficiency anaemia.

Rationale**:** include specific reference to adolescent girls. Adolescent girls are at risk of iron deficiency because of rapid growth combined with menstrual losses.

Ref: The Lancet. [Volume 393, Issue 10170](https://www.sciencedirect.com/science/journal/01406736/393/10170), 2–8 February 2019, Pages 447-492

**Paragraphs 2 and 4**

While obesity and overweight are globally surpassing underweight, this is highly dependent on context. Perhaps add a comment on the continued presence of underweight in older children and adolescents.

Elaborate on the impact that overweight/obesity and diet-related NCDs, including diabetes, have on disability–adjusted life years and mortality worldwide and prevalence across socio-demographic characteristics such as gender, urban/rural and socio-economic status (equity dimension).

Consider adding a point about the double or multiple burden of malnutrition specifying that all of these problems can occur at once, at the individual, household, and country levels. This will reinforce the approach outlined in later sections.

**Paragraph 11**: Most vulnerable to malnutrition: ADD – groups migrating or displaced due to conflict or natural disasters/ land tenure issues.

**Additional suggestions:**

* A disproportionate focus is placed on nutrition/malnutrition. Consider framing nutrition/malnutrition under the broader topic of food systems to provide a more holistic background and rationale for the piece.
* Consider linking food systems and nutrition to SDG #2, specifically SDG 2.2 and the impact that food systems have on the achievement of Agenda 2030 and other SDGs (1,3,4,5,6,8,10,12). This information could be moved from the second half of #16.
* Consider including the global context of hunger and the reversal of trends over last 4 years whereby hunger has reached levels equivalent to those seen over a decade ago.

**Paragraph 7**. Consider separating this point into two: (1) conflict, peace and security, and (2) climate change. Consider the following language “Fragility and susceptibility to the impacts of climate change and disaster risks pose….”

**Paragraph 8**. Consider including the global context of hunger and the reversal of trends over the last 4 years whereby hunger has reached levels equivalent to those seen over a decade ago.

**Paragraph 10**. Consider changing “…accessing healthy diets” to “accessing healthy foods to better support the uptake of healthy diets.”

**Paragraph 15**. Consider the inclusion of another paragraph that describes global actions towards the transformation of food systems to ensure that both food systems and nutrition are adequately addressed.

**Paragraph 16**. Consider moving second half of this point on SDGs to Background and Rationale to improve clarity.

**Paragraph 17**. Makes reference to “…effective policies, investments and institutional arrangements that will address malnutrition in all its forms.”. Consider replacing “malnutrition in all its forms” with “broken food systems in order to address nutrition/malnutrition”.

**Paragraph 18**. Makes reference to “the objective of the VGs is to contribute to reshaping or promoting food systems to ensure that the food that contributes to healthy diets is available, affordable, acceptable, safe…” This is the vocabulary that should be used throughout the document, because it is the reshaping/promotion of healthy food systems that will contribute to healthy diets and improved nutritional outcomes.

**Paragraph 19.** Address policy fragmentation with special emphasis on the food, agriculture and health sectors,” but should also consider including the food systems links to other key systems (energy system, trade system, health system, etc.) and sub-systems (farming system, the waste management system, the input supply system, etc.) all of which link directly back into the larger food system itself.

**INDIGENOUS ISSUES**

While Canada recognizes the intention to align Chapter 1 with the Voluntary Guidelines’ focus on global agricultural systems and retail consumption, the section does not adequately reflect the unique challenges malnutrition poses for Indigenous populations. Specifically, the Chapter lacks reference to Indigenous food systems and the related importance of food sovereignty in Indigenous communities. These concepts are relevant to many countries striving to meet Sustainable Development Goal 2 of the 2030 Agenda: to end hunger, achieve food security and improved nutrition and promote sustainable agriculture.

We echo our feedback from May 2019 aimed at strengthening Chapter 1’s Indigenous content by leading with a reference to SDG Goal 2, adding Indigenous peoples to the list of relevant stakeholders (para. 26), and emphasizing the connection between sustainable food systems and the protection of traditions, cultures, and ways of life (para. 21). These recommendations align closely with the FAO Indigenous Peoples Team’s comments on the unique qualities of Indigenous food systems, which serve to distinguish them from traditional, mixed, and modern food systems.

With regard to the second question posed above (on underlying problems hindering food systems to deliver healthy diets), Indigenous and Northern food systems face similar challenges to those of global Indigenous populations (e.g., threats from climate change, ongoing legacies of colonialism, the cost of traditional harvesting practices, and increased exposure to environmental contaminants). In the Arctic and Northern context, these challenges are exacerbated by the impacts of the region’s remote geography and lack of physical and telecommunications infrastructure on the Arctic food value chain. These conditions have contributed to: a general overreliance on raw food exports; bottlenecking of distribution points; and limited innovation in primary and secondary product development.

**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 principles are appropriate, and indeed are well-aligned with the guiding principles under the Food Policy for Canada (<https://www.canada.ca/en/campaign/food-policy.html>), but could further emphasize the special attention required by for indigenous peoples in certain contexts, in relation to factors such as, increased vulnerability to food insecurity, traditional knowledge, and distinct food procurement and community distribution practices (see additional comments regarding indigenous peoples below).

**Paragraph 36.** These guiding principles are:

g) Elaborate on capacity building e.g. capacity building to integrate nutrition in other sectors (health, agriculture, labour, trade, gender, social protection, industry); and capacity building of governance mechanisms to enable nutrition considerations in the coordination of multi-sectoral nutrition action at country-level.

**Paragraph 16**. Consider moving second half of this point on SDGs to Background and Rationale to improve clarity.

**Paragraph 17**. Makes reference to “…effective policies, investments and institutional arrangements that will address malnutrition in all its forms.”. Consider replacing “malnutrition in all its forms” with “broken food systems in order to address nutrition/malnutrition”.

**Paragraph 18**. Makes reference to “the objective of the VGs is to contribute to reshaping or promoting food systems to ensure that the food that contributes to healthy diets is available, affordable, acceptable, safe…” This is the vocabulary that should be used throughout the document, because it is the reshaping/promotion of healthy food systems that will contribute to healthy diets and improved nutritional outcomes.

**Paragraph 19**. Address policy fragmentation with special emphasis on the food, agriculture and health sectors,” but should also consider including the food systems links to other key systems (energy system, trade system, health system, etc.) and sub-systems (farming system, the waste management system, the input supply system, etc.) all of which link directly back into the larger food system itself.

**Paragraph 24**. a) biophysical and environmental should include sustainability.

d) socio-cultural drivers or e) demographic drivers should include population health.

**General**:

The title of the section: “2: Guiding principles for reshaping or promoting sustainable food systems” suggests the focus is on “sustainable food systems” (which it may be, however, the overarching title focuses on “food systems and nutrition”). The preceding section provides definitions for both “sustainable food systems” and “food systems” suggesting they are distinct; we suggest that there be a stronger narrative for the reader that acknowledges the focus is on “sustainable food systems” (if that is the intent) or an adjustment in the language for consistency with the title of the Voluntary Guidelines. [In Section 1, it would be useful to have a clear positioning of the relationship between sustainable food systems (as the goal) and addressing malnutrition in all its forms.]

**Paragraph 35** – the concepts in this paragraph are not clearly articulated in the Objective (para 18); we suggest the objective could be strengthened to be more clear on the intentions of the Voluntary Guidelines.

**Some additional suggestions:**

1. It is suggested that “systemic and holistic” and “evidence-based” approaches be separated into two points.
2. It is suggested that “coherence” and “context” specific policies be separated into two points.

We suggest that consideration be made to include definitions for food security, malnutrition, undernutrition and overnutrition to ensure consistency across key concepts concerning food systems and nutrition.

**INDIGENOUS ISSUES**

We echo feedback from May 2019 that the principles in Chapter 2 should be strengthened to better align with food security and food sovereignty issues facing Indigenous communities within Canada and the broader global context. Specifically, we would recommend the following:

**Paragraph 26:** Indigenous peoples should be included in the list of stakeholders in that the following

reference should be included in the draft’s guiding principles:

**Paragraph 36.** These guiding principles are:

1. *Systemic and holistic and evidence-based approach*. Promote a systemic, holistic, and evidence-based approach that considers food systems in their totality, **[integrates Indigenous and** traditional **forms of knowledge]**, seeks to simultaneously maximize outcomes across all sustainability dimensions, and looks at the multidimensional causes of malnutrition in all its forms.

The integration of Indigenous knowledge within sustainable food systems is integral to Indigenous food systems and will also help to maximize opportunities in commercially-based food-producing markets. This will necessitate collaboration with Indigenous partners where new systems can be co-designed in ways that support and maximize these opportunities.

**Paragraph** 36(c): “healthy people, healthy planet” should include a reference to the promotion of ethical and environmental values. These areas are of particular relevance to Arctic and Northern Communities, and are core to the UN Sustainable Development Goals. Adding to the urgency to act in an ethical and environmentally conscious way are the findings of the Intergovernmental Panel on Climate Change Special Report[[78]](#footnote-78)[1] that calls for global action to limit global warming to no more than 1.5 °C by 2030. Specific to food production, the combination of different post-harvest stages in the food value chain such as packaging, retail, transport, processing, food preparation and waste disposal represents approximately 5-10% of global greenhouse gas (GHG) emissions and are expected increase if the post-harvest stages are not well-managed[[79]](#footnote-79)[2].

Achieving the IPCC target will require a cross-sectoral approach that implicates food systems. Technological advancement and digital food production technologies will play a major role but will also require a paradigm shift in relation to the needed skills of Arctic and Northern residents. This will be especially significant to small and medium sized enterprises and entrepreneurship opportunities particularly around the circular economy and industrial biotechnology.  Different regions will have their own assets and challenges which require appropriate responses in order to maximize the opportunities locally and globally. These and other socio-environmental drivers require a transformational response. Such a response should be place-based, challenges led, research driven, and have global influence.

**Paragraph 36(f):** “Realization of the Right to Food” currently acknowledges a right to *diverse* food systems. This language could be strengthened to acknowledge a right to diverse and *culturally-relevant* food. In developing this principle, drafters may wish to refer to the language of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), Article 20: “Indigenous peoples have the right to maintain and develop their political, economic and social systems or institutions, to be secure in the enjoyment of their own means of **subsistence** and development, and to engage freely in all their traditional and other economic activities.”

These changes would help to better align the Voluntary Guidelines with the submission from the FAO Indigenous Peoples Team, which has emphasized the need for an explicit reference to Indigenous food systems. This document highlights the presence of distinct characteristics that set Indigenous food systems apart from the

This could be introduced as a key concept following sustainable food systems at para. 29.

**Additional comments:**

Generally, the concept of cultural appropriateness of diets, recommendations and communications in the context of Indigenous populations is not really addressed (i.e. p. 7 – Healthy Diets – the WHO definition may not be appropriate for Northern traditional diets, P.8 Realization of the right to food – no mention of cultural appropriateness of food and more generally when the document speaks to education and programmes that they be culturally appropriate for Indigenous populations).

There isn’t a lot of emphasis on poverty as a reason for food insecurity and poverty-reduction as a guiding principle. Some other factors could include that are not mentioned but are relevant to the Indigenous context include lingering impacts of colonization, including on perceptions of governments actions to encourage healthy eating, as well as the very limited commercial availability of traditional foods in communities where people are increasingly participating in jobs, which does not leave time for traditional harvesting.

In the context of Indigenous populations, several factors undermine food security.  These include: poverty; environmental contamination and changes affecting traditional food harvesting and consumption; unsustainable harvesting/food production practices; lack of access to the land; loss of cultural identities, traditional knowledge and traditional food practices; geographic isolation; and the unreliable supply, quality, and high prices of market food in remote and isolated communities. [Power, E. (2007). Food Security for First Nations and Inuit Background Paper. Prepared for the First Nations and Inuit Health Branch, Health Canada.]

**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?**

**Paragraph 43 Production Systems** (policy-relevant areas) :

h) Investing in research and innovation is important but so is **scaling-up and bringing to market**  crops that have been found to lead to improvements in access to more nutritious foods while minimizing environmental impact.

**Paragraph 45 (a) – Practices and technologies to protect and add nutritional value along food chains**

We suggest that the recommendation not specifically speak to adding micronutrients, i.e. fortification, during processing, which raises concerns about the types of foods being fortified, but instead to speak to the nutritional quality of the food overall. Please consider instead revising the statement to:

“Policies, programmes and approaches can be put in place to preserve or **~~add micronutrients into foods~~** **enhance the nutritional profile of food** during processing…”

**Paragraph 48:**  Include reference to micronutrient supplementation as an important public health intervention for certain high-risk groups in specific contexts. For example, in areas where the anaemia prevalence is high, iron supplementation is a recommended as a public health intervention for adolescent girls and women, with extra caution in malaria endemic regions. Rationale: WHO has published guidelines on iron supplementation for certain at-risk population groups (e.g. infants and children, pregnant women, adolescent girls).

**INDIGENOUS ISSUES**

Where possible, the Voluntary Guidelines should seek to align with existing national and regional efforts to achieve the Sustainable Development Goals of the 2030 Agenda. For example, recent Canadian policy initiatives such as the Poverty Reduction Strategy and the forthcoming Arctic and Northern Policy Framework were developed with specific consideration of the Sustainable Development Goals in mind. The Committee on World Food Security may wish to have stakeholders and participating countries identify relevant national strategies and policy initiatives where food systems and nutrition could be highlighted for subsequent policy actions.

To facilitate these connections to the Canadian context and increase overall policy coherence, NAO recommends two additions to the enabling factors set out in paragraph 41:

* “promotion of Indigenous food systems.” This addition will align with the comments of the FAO Indigenous Peoples Group and help for increased alignment with national governments and Indigenous stakeholders. For example, in the Canadian context, Inuit continue to rely heavily on local plants and wildlife, such as berries, caribou, fish, and sea mammals. These foods are nutrient dense and their harvesting encourages traditional practices, including food sharing, which help to strengthen community resilience and self-reliance. A study in 43 Arctic communities found that on days when people ate both traditional and market foods, their diets had increased nutrient intake. (Kuhnlein et al. (2004).
* “poverty reduction and inclusive growth.” This addition will serve to highlight the connection between poverty, inequality, and malnutrition. As referenced in NAO’s May 2019 feedback, a greater focus on poverty reduction will allow the document to address issues related to Indigenous peoples, as well as gender, and align more closely with the 2030 Agenda.

MSF supports the Guiding Principles for Reshaping or Promoting Sustainable Food Systems as proposed with the following exceptions:

1. It is suggested that “systemic and holistic” and “evidence-based” approaches be separated into two points.
2. It is suggested that “coherence” and “context” specific policies be separated into two points.

MSF would also like to note that these guiding principles are well-aligned with Canada’s guiding principles under the Food Policy for Canada.

In addition, MSF suggests that consideration be made to include definitions for food security, malnutrition, undernutrition and overnutrition to ensure consistency across key concepts concerning food systems and nutrition.

Canada proposes a few changes to the categorization of the policy entry points as per below. It is also proposed that an additional and overarching category be created to encompass cross-sector food system policies, which are broader than supply chain, food environment, and consumer-oriented policies.

Cross-sector food system policies

* Nutrition-sensitive trade policies
* Social protection programs
* Governance
* International assistance
* Labour policies are not mentioned but constitute an important component of food systems.

**PART 1: FOOD SUPPLY CHAINS**

* It is proposed that an additional category be added under food supply chains for ‘Research and Development’ to reflect recommendation #7 of the HLPE on improving data collection and knowledge-sharing on food systems and nutrition, and to underscore the importance of supporting the capacity of actors across food supply chains to adapt to changing consumer demand and food habits as noted under Part 3 – Consumer Behaviour.

**1. Production systems**

b) Agricultural policies and strategies

* In addition to promoting healthy and sustainable production models, national policies and public investments should reflect the various food system transitions taking place using integrated and coherent approaches that include, but that go beyond raising the profile of nutrition. For example, traditional, mixed, and modern food systems are increasingly under pressure to shift toward climate-smart agriculture, equitable production systems that empower women, and nutrition-sensitive agriculture in order to support food security and to meet the increasing global demand for healthy food products.
* Public sector support should take these multiple pressures and ongoing transitions into consideration to support supply chain actors at different scales in transitioning and diversifying their production, particularly the most vulnerable producer groups and sectors.

c) Promotion and sustainable use of agrobiodiversity; and  
e) Diversity of genetic resources

* Maintaining traditional seed varieties, for example through seed banks, can also help support agrobiodiversity as well as resilient and culturally-diverse agricultural systems.

d) Sustainable use of forest, wildlife, aquatic resources

* It is proposed that sustainable land and water management in agriculture be added to this category.

g) Women producers’ livelihoods

* Canada strongly supports gender-transformative approaches in agriculture (GTAAg).

h) Agricultural research, innovation and development for healthy diets

* It is proposed that this be moved into a separate category named ‘Research and development’ under ‘Food supply chains’ since research and development can apply to any activity or process along food supply chains. It is important to orient all of the steps along food supply chains toward health and sustainability.

i) Climate change adaptation and mitigation

* It is proposed that climate-smart agriculture (CSA) be highlighted as an approach for climate change adaptation and mitigation. In addition to supporting climate change adaptation and mitigation, CSA can also increase productivity, which can have a positive impact on livelihoods and food security for smallholder farmers, and women farmers in particular.

**2. Handling, storage, and distribution**

* The policy area of food recovery and redistribution could be added to this category and removed from Part 3 – Consumer Behaviour, as this is a supply chain process that focuses on storage and distribution.

a) Food loss and waste

* It is proposed that this category encompass food loss only since this is a supply chain issue, and since food waste happens at the consumer level.

**3. Processing and packaging**

* It is proposed that sustainable packaging be added as a third policy area under this category.
* An opportunity exists for innovations in product packaging, aimed specifically at displacing single use plastics.

**4. Retail and markets**

a) Support to smallholders

* Setting up and supporting centralized regional distribution hubs with adequate storage facilities, and with adequate road infrastructure, could be another approach to supporting smallholders in reaching markets.

b) Supply of nutritious foods

* It is proposed that this category be broken up into two categories to capture both (1) encouraging retailers to supply more nutritious food items, and (2) encouraging retailers to support local economies through procurement of locally produced foods.

**PART 2: FOOD ENVIRONMENTS**

**1. Availability and physical access (proximity)**

a) Food deserts and food swamps

* It is proposed that this category be broken up into multiple categories that represent various policy entry points to address food deserts and food swamps, as these are issues as opposed to policy solutions. New categories could include: 1) Zoning and spatial planning policies, 2) Infrastructure and mobile markets, and 3) Financial incentives for businesses to increase availability and access to fresh fruits and vegetables.

c) Systemic food assistance

* Is it proposed that this entry point be moved to a new overarching category related to cross-sector food system policies. Food assistance goes beyond improving food environments domestically and internationally as it addresses more systemic issues in access to adequate amounts of nutritious food. Humanitarian assistance policies can also have a scope beyond food systems, but should be aligned with food system and nutrition objectives.

**2. Economic access (affordability)**

a) Nutrition-sensitive trade policies

* It is proposed that the heading of this entry point be reframed as ‘trade-related bans and restrictions’, and that another category for nutrition-sensitive trade policies be created under the overarching category of ‘Food system policies’. The HLPE report on nutrition and food systems refers to this policy solution as ‘Promote healthier diets through discriminatory trade policies’ and provides examples of import bans in Fiji and Samoa for products with high fat contents which had previously been ‘dumped’ on their market.
* Nutrition-sensitive trade policies, as they are described in the document, can go beyond food environments and economic access/affordability. This approach to trade would be a broader system-level policy which could affect supply chains, food environments, and consumer behaviour.

b) Fiscal and pricing policies

* It is noted that subsidies and other types of government support systems of health-promoting and sustainable crops and food products are not mentioned as an example in this category. Such supports could reduce prices of healthy options for consumers and increase affordability.
* When recommending taxes on unhealthy food products, it is important to consider differential effects on low-income populations, who may not have access to healthier alternatives, in which case taxes could impose a financial burden on low-income consumers.

c) Social protection programmes leading to improved nutritional outcomes

* It is proposed that social protection programmes be moved to a new category of food system policies. Social support is needed to address the social determinants of health such as income, which goes beyond food environments and affordability of food. Alternatively, the heading of this category could be changed to ‘Nutrition standards for social protection programs’ if it is intended to refer to the quality of food provided through the programmes as opposed to the provision of these programs itself.

d) Food waste

* It is proposed that this category be removed from the *Food Environments* category as it is already listed under *Food* *Supply Chains* as ‘food loss and waste’. Food recovery and redistribution is a supply chain activity; it is also proposed that it be added as an additional category under ‘Handling, storage, and distribution’.

**3. Promotion and advertising**

* It is proposed that this category be named ‘Promotion, advertising, and information’ since some of it pertains to information provided to consumers on labels, which does not necessarily constitute promotion or advertising.

**PART 3: CONSUMER BEHAVIOUR**

**1. Food and nutrition education and information**

c) Nutrition education

* The opportunity exists for food literacy and food systems literacy be included under this heading. Food literacy is extremely important and should consider including components of food and diet that go beyond nutrition. For example, learning about how food is produced, the environmental sustainability of various types of foods, socio-cultural norms around how food is prepared and consumed, food skills training, learning how to minimise food waste, as well as minimizing costs while purchasing healthy and sustainable food.
* An opportunity also exists for food waste awareness to be included as a fourth policy area under this category as food waste occurs at the consumer level and education and awareness are critical to reducing consumer-level food waste.

**2. Social norms, values, and traditions**

a) Evolving food habits

This policy area notes an issue/trend, however, this does not provide a solution to the potential positive and negative consequences of evolving food habits.

**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 policy-making?**

We recommend including within the policy-relevant areas the need to work with the private sector (including SMEs) to increase the availability and access to safe and nutritious foods. Guidelines should include how to effectively work with the private sector and manage conflicts of interest within the food system.

Moreover, we recommend considering:

* Examples from Chile (new food law)
* New initiatives from Canada, e.g.,
  + *Food Policy for Canada* (2019)<https://www.canada.ca/content/dam/aafc-aac/documents/20190614-en.pdf> -- it sets a foundation for increased integration and coordination of food-related policies and programs. Its vision is that “all people in Canada are able to access a sufficient amount of safe, nutritious, and culturally diverse food. Canada’s food system is resilient and innovative, sustains our environment and supports our economy.”
  + *Canada’s Dietary Guidelines* (2019)<https://food-guide.canada.ca/en/guidelines/> -- These Guidelines promote healthy eating and overall nutritional well-being, and support improvements to the Canadian food environment, including by providing advice on the elements of food environment awareness (e.g. food marketing), food literacy and skills, socio-cultural dimensions of healthy eating, and environmental concerns about sustainability and food loss/waste.

**INDIGENOUS related policies/interventions**

In the Canadian context, there are several policies and interventions that support local and “traditional food cultures” as set out in the section listing social norms, values and traditions (paragraph 56b). The new Food Policy for Canada (referenced above) has an emphasis on local and Indigenous food systems, and provides funding for local food projects and Indigenous harvesters, for example, through the Local Food Infrastructure Fund, the Harvesters Support Grant, and the Northern Isolated Community Initiative Fund.

In the Canadian Northern context, engagement with communities affirmed that Northerners see an “ideal” food system as having three essential elements: Country/traditional food (food that is locally harvested, hunted, and trapped); locally produced food (food grown in a community, despite harsh conditions); and market food (food shipped from elsewhere and purchased from a retailer or supplier).

Ongoing discussions related to an Arctic Foods Innovation Cluster(AFIC) may provide lessons for development of sustainable food systems going forward. The Government of Canada has been working with domestic and international partners to explore the appropriateness and strategic usefulness of establishing an AFIC under the auspices of the Arctic Council’s Sustainable Development Working Group. The AFIC would pull together relevant people in the Arctic food value chain for a cluster-based approach to food production and regional economic development. We understand *food production* to encompass traditional, artisanal, and industry-scale production of natural resources into food for own, national, and international consumption. We understand *food innovation* to encompass 1) new modes of production and consumption patterns (e.g., the introduction of hydroponics or aquaponics farming); and 2) new production and consumption of non-food products (e.g., using waste products from the seafood sector to produce medicine or fabrics or seaweed production as both food source and CO2 sequestration.)

A cluster-based approach to food innovation would draw together Arctic food producers with governments, Arctic Indigenous communities, universities, research centers, vocational training providers, and industry associations and youth. Overall, it would seek to respond to global challenges of food production while seeking to define the Arctic’s role and contribution to the changing climate and issues of food security locally and around the world.  The AFIC will create opportunities for entrepreneurship and innovation in the food and drink industry and supply chain, while strengthening the Arctic’s position at the international scale.

The objective of the AFIC will be to create added value for Arctic Communities by connecting northern entrepreneurs, southern-based investors, research centers, businesses and bio-technology developers that have knowledge and interest in the Arctic food industries.  The AFIC would be motivated by the combined efforts to respond to global challenges such as food security and climate change.

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

The guidelines would benefit from having clear outlined actions to help different stakeholders implement – or to reference relevant resources (e.g. the Compendium of Actions for Nutrition (FAO/REACH) and existing tools from SUN).

To support implementation of the Voluntary Guidelines, governance is key. Governance in support of policy coherence, for example national-level horizontal food system and nutrition committees, task forces, or councils composed of multiple sectors across society and government that could support the development of country-specific implementation plans for the Voluntary Guidelines.

Include examples of successful integration, policy coherence.

Illustrate how the CFS aligns with existing international agreements, targets and indicators to minimize duplication which could reduce concern that implementation will take significant additional resources .

**INDIGENOUS ISSUES**

Once endorsed, the CFS should ensure documents are disseminated to Indigenous governments and political organizations at the regional, national, and international levels. In the Canadian context, First Nations, Inuit, and Métis governments and organizations continue to play a significant role in the national policy discourse through the development of subject-specific policy documents such as national frameworks and implementation strategies. The active engagement of Indigenous partners within the implementation process will allow the Guidelines to achieve their stated purpose to help guide actors toward “effective policies, investments and institutional arrangements that will address malnutrition in all its forms,” which account for the unique factors arising from the cultivation and stewardship of Indigenous food systems.

## Alessandra Mora, UN System Standing Committee on Nutrition, Italy

Please find attached the input by the UN System Standing Committee on Nutrition (UNSCN) to the Online consultation on the CFS VG on Food Systems and Nutrition.

Best regards,

Alessandra Mora

**Recommendations by UNSCN on the draft CFS Voluntary Guidelines on Food Systems and Nutrition (VGs)**

The CFS Voluntary Guidelines on Food Systems and Nutrition will be the most important contribution of the CFS to the UN Decade of Action on Nutrition and the operationalization of the ICN2 Framework for Action. The objective of the VGs is to address malnutrition in all of its forms.

The rich discussion during the last OEWG on the 30st of May, showed that the elements that are currently mentioned in the “zero-draft” of the VGs have provoked a good debate and proven to be a very useful input for discussion and the VGs itself. Various inputs stressed the need to ensure the elements are seen as a comprehensive set of factors that can lead to more sustainable food systems and to an improvement of diets and nutrition only if they are part of comprehensive and coherent sets of measures and policies. Taken individually the measures may not always have the intended effect, nor the systemic force to transform the food system. Therefore the current chapter three of the zero draft can be reshuffled, as was suggested during the OEWG, to answer to the multiple demands of the various stakeholders as well as to answer to a need for prioritization for the positive impacts on nutrition, equity and sustainability. Maximising policy coherence and reduction/elimination of policy fragmentation are key in order to have positive impact on all three of them and minimize trade-offs.

UNSCN suggests the following four policy areas to be addressed in the VGs, which are cross cutting through most if not all of the elements of the food system. They are also equally relevant to all typologies of food systems. In each areas, one or several suggestions are made for actions that have the potential to address several forms of malnutrition and have impact across the food system.

**TERRITORIAL, OR CONTEXT SPECIFIC POLICIES, FOSTER DIVERSITY**

In a rapidly changing context that is highly vulnerable to climate change, socio-demographic changes, technological innovations, it is paramount that the VGs are supportive of local food systems – also promoted through the Recommendations of the ICN2 Framework for Action[[80]](#footnote-80) – that are fit to local contexts, local dynamics and cultural identities. One example of local dynamics is the context of rural-urban transformation and rural-urban linkages. The VGs should provide evidence-based guidance on how to build on and support these local dynamics, preserving diversity and promoting nutrition and healthy diets. Promotion and protection of local and regional healthy diets can be a good starting point to foster territorial specificity, as well as a variety of production systems that are fit to certain contexts, as well as resilient to shocks. Renewed attention for indigenous or underutilised crops and species, is helpful as has been acknowledged by the CFS (CFS policy recommendations on Sustainable forestry: <http://www.fao.org/3/I8877EN/i8877en.pdf>).

**GOVERNANCE AND EQUITY**

Right to adequate food is an important guiding principle, ensuring no-one is left behind while transforming food systems. Governance of food systems should support the progressive realisation of the right to food and maximise positive impact on nutrition, health and wellbeing and where needed mitigate negative impact on nutrition by other sectors. Food systems encompass all actors, from production to consumption. Whereas all agree that governments should take the lead in policy formulation, other actors are essential.

Rules and regulations - including trade - set by governments are essential to ensure a fair “arena” where decisions are made about what to produce, trade and consume and how. In this aspect the roles and positions of poor consumers, small scale producers, ethnic minorities, youth and women are essential. Some policy measures may need to target specific groups to prevent further increases in inequity and vulnerability. Specific measures are needed to protect infants, young children and adolescents AND to sustain their health now and when they grow up. Policy measures may also be needed to mitigate potential negative effects in case of trade-offs.

The [UNSCN Discussion Paper ‘Global Governance for Nutrition and the role of UNSCN’](https://www.unscn.org/uploads/web/news/document/GovernPaper-EN-may17-WEB.pdf) stresses the importance of inclusive governance for nutrition (including all relevant actors, also beyond governments) and careful stewardship to operationalize the necessary transformative action at global, national and local levels to address malnutrition in all its forms. Governments are primarily responsible for implementing effective policy measures while ensuring that everyone has access to safe and nutritious food, consistent with the right to adequate food and the fundamental right of everyone to be free from hunger. The [Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of the national food security](http://www.fao.org/3/a-y7937e.pdf) provide practical guidance to States in this sense and represent a step towards integrating human rights into the work of actors dealing with food and agriculture.

**ENVIRONMENTAL SUSTAINABILITY AND CLIMATE CHANGE**

An important aspect of the VGs is the promotion and protection of environment, including quality of water, soil and air and the preservation of biodiversity as well as the prevention of further climate change and adaptation to it. In a world that is suffering from climate change, biodiversity loss, degraded soils and polluted water, it is paramount to protect the ability to produce healthy diets for current and future generations. Production decisions must be based on sustainability criteria AND on what is needed to nourish people, not simply to feed people with an adequate amount of calories.

The CFS policy recommendations on [Food Security and Climate Chang](http://www.fao.org/3/a-av035e.pdf)e and on [Water for Food and Nutrition](http://www.fao.org/3/a-av046e.pdf) recognize that the adverse effects of climate change can pose serious threats to food security and nutrition and stress the importance of sustainable management and conservation of ecosystems to maximize long-term benefits for FSN. The [UNSCN Discussion Paper - Sustainable Diets for Healthy People and a Healthy Planet](https://www.unscn.org/uploads/web/news/document/Climate-Nutrition-Paper-Nov2017-EN-WEB.pdf) clearly shows the interdependence of climate change, food systems, diets and malnutrition and health and calls for strengthening the links between the climate and nutrition communities. The [IPCC special report on Climate Change and Land](https://www.ipcc.ch/report/srccl/) (August 2019) reiterates the importance of reducing greenhouse gases emissions from all sectors, including agriculture and food production, and underlines that healthy, balanced and sustainably produced diets present major opportunities for adaptation to and limiting climate change.

UNSCN would suggest that the ‘healthy people- healthy planet’ nexus might be highlighted even more as a key driver to avoid policy incoherence.

**SUSTAINABLE PRODUCTION AND CONSUMPTION**

In the current policy debate, too often sustainable production and consumption are still looked at as separate issues, whereas the one cannot go without the other. Production decisions need to be based on the nutritional needs of people, and consumers need to make decisions of what to consume based on healthy and sustainable options. Production decisions also entail product composition, including levels of salt, sugar and (trans) fats. The VGs should reconnect production with consumption decisions underpinned with considerations for health, well-being and sustainability. Shift in current consumption patterns or diets of certain groups may be needed for both sustainability and health considerations. National Food based dietary guidelines that contain sustainability criteria may be good tools to reconnect production and consumption, provide guidance to policy makers about what is a healthy diet and which food should be catered for, guide consumers what and how to consume and producers what to produce. Addressing food losses and waste is an important aspect as well. Earlier CFS recommendations ([Food losses and waste in the context of sustainable food systems](http://www.fao.org/3/a-av037e.pdf) and [Connecting smallholders to markets](http://www.fao.org/3/a-bq853e.pdf)) recognize the importance of sustainable production and consumption. For example, Recommendation 4 of Connecting smallholders to markets calls for expanding “…opportunities, including implementing institutional procurement programs for public institutions, food assistance and school feeding where smallholders are linked to structured demand for food and agricultural products and where consumers can access sufficient, safe, healthy, nutritious, and diverse smallholder produced food, including during all cases of protracted crises and conflicts”.

An integrated approach from farm to fork is vital to avoid policy incoherence, and to ensure that policies included in the agricultural production system are followed through in the different steps of the food supply chain, particularly interlinked with the elements of food distribution and retail and consumer policies. Such an alignment could be supported by global policy targets and the CFS might consider establishing global policy targets for the achievement of the overarching targets of addressing malnutrition in all its forms.

**ACTIONS OR INTERVENTIONS THAT ARE SUPPORTIVE OF ALL THE ABOVE:**

* Development of FBDGs with sustainability criteria
* Institutional buying to support the transformation of food systems. E.g. for schools, hospitals, public institutes
* In addition, the potential positive impact of the two actions above can be supported with food and nutrition education and information.
* Investments that move away from the current emphasis on a limited number of staple crops (maize, wheat and rice) and a few animal breeds. More investments in the production of a diverse range plant-based foods (i.e. fruits and vegetables and pulses) to support the consumption of a healthy and affordable diets are needed, as well as the supporting agricultural research to increase availability and affordability of this diverse range. The [HLPE report on agroecology and other innovations](http://www.fao.org/fileadmin/user_upload/hlpe/hlpe_documents/HLPE_S_and_R/HLPE_2019_Agroecological-and-Other-Innovative-Approaches_S-R_EN.pdf) lists a few recommendations to possibly support the transition to more diverse and sustainable food systems.

## Sandro Dernini, CIHEAM, Italy

The perspective of Chapter 1 does not consider sustainability in all its three dimensions in line with the 2030 Agenda. It is mainly focused on nutrition and malnutrition, it is too narrow approach and it does not fully reflect the challenging issue of a systemic perspective on food systems. It does not sufficiently consider the conditions under which food is produced, processed, distributed, prepared and consumed, nor how food systems can be made more sustainable in order to ensure healthy and sustainable diets development.

“Sustainable” should be inserted between “healthy” and “diets” . The definition of “sustainable diets” (FAO, 2010)  should be inserted in paragraph 32 among all other definitions.

In Paragraph 16, referring to promoting policy coherence, a reference to the One Planet (10YFP) Sustainable Food Systems (SFS) Programme should be inserted.

In paragraph 26 among stakeholder groups are missed fishermen organizations, after farmers organizations.

**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?**

The perspective of Chapter 1 does not consider sustainability in all its three dimensions in line with the 2030 Agenda. It is mainly focused on nutrition and malnutrition, it is too narrow approach and it does not fully reflect the challenging issue of a systemic perspective on food systems. It does not sufficiently consider the conditions under which food is produced, processed, distributed, prepared and consumed, nor how food systems can be made more sustainable in order to ensure healthy and *sustainable* diets development.

“Sustainable” should be inserted between “healthy” and “diets” .

The definition of “sustainable diets” should be inserted in paragraph 32 among all other definitions.

In Paragraph 15, more relevant references to sustainable food systems should be inserted such as the 2018 FAO COAG 2018 recommendations (Link: <http://www.fao.org/3/my349en/my349en.pdf>) that explicitly refer to cooperation with the CFS, as well as the HLPF Ministerial Declaration 2018 (para 26, link: <https://www.un.org/ga/search/view_doc.asp?symbol=E/HLS/2018/1&Lang=E>), the UNGA-73 resolution “Global health and foreign policy: a healthier world through better nutrition” (para 3, link: https://undocs.org/en/A/RES/73/132 ) and the UNEA-4 Ministerial Declaration 2019 (para 5d, link: <http://wedocs.unep.org/bitstream/handle/20.500.11822/28463/K1901029.pdf?sequence=6&isAllowed=y>).

In Paragraph 16, referring to promoting policy coherence, we would like to see a reference to the One Planet (10YFP) Sustainable Food Systems (SFS) Programme included. The SFS Programme is a global multi-stakeholder initiative that promotes policy coherence in the field of sustainable food systems, and thus including nutrition. Through the 10YFP – which has a Rio+20 mandate and has been recognized as an implementing mechanism for SDG12 (Sustainable Consumption and Production), the SFS Programme reports on a yearly based to the High-level Political Forum on Sustainable Development. The topic of healthy and sustainable diets is of high importance and relevance in the SFS Programme; it is one of its five cross-cutting focus themes, which guide the Programme towards the achievement of its goal. The SFS Programme promotes an approach that supports diets that are healthy and that fully consider the socio-economic and environmental outcomes of food consumption.

In regard to Paragraph 25, we would like to draw your attention to the Collaborative Framework for Food Systems Transformation that was recently launched by the One Planet (10YFP) Sustainable Food Systems (SFS) Programme (Link: https://www.oneplanetnetwork.org/sites/default/files/un-e\_collaborative\_framework\_for\_food\_systems\_transformation\_final.pdf). We would like to invite the CFS-Secretariat to takee a look at the framework as we believe it may be a relevant source for the VG.

**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?**

In paragraph 26 among stakeholder groups are missed fishermen organizations

The definition of sustainable diets is missed in paragraph 32. The FAO (2010) definition covers the three sustainability dimensions and health/nutrition. It was also used in the HLPE 2017 report on Nutrition and Food Systems.

## David Suttie, IFAD, Italy

Below are some considerations I would like to raise on behalf of IFAD on the draft Voluntary Guidelines.

Best regards,

David Suttie

1. On the current situation and underlying problems:

- In a context of divergent narratives and approaches to developing the types of food systems that may be thought to offer the best potential for promoting better nutrition, it is surprising that the guidelines have little to offer in terms of a broad macro-level vision of food systems – both prevailing and desired. For example, as detailed in the recently published HLPE report “Agroecological and other innovative approaches for sustainable agriculture and food systems”, it would be relevant to note that smallholder farming systems make important contributions to producing nutrients in the most populous and food insecure areas of the world, and that diversity of agricultural and nutrient production has been found to diminish as farm sizes increases (p.73). These phenomena are also noted in the background paper for the Decade on Family Farming, prepared by FAO and IFAD (see pp.6-7 at: <http://www.fao.org/3/ca4778en/ca4778en.pdf>). While not stating that large farms do not also have a role to play – clearly they do – it should be a concern that, given the importance of smallholder farms in maintaining diversity and nutrition in food systems, policy frameworks in many contexts are creating biases towards larger-scale farms and food companies – in terms of policies related to land acquisition, marketing, trade policies, and even food and safety regulations. While some important considerations are included in the draft in terms of supporting smallholders, there would be scope for acknowledging the macro-level situation and their present and potential role therein.

2. On the guiding principles and their focus:

- Given the above, the concern of these guidelines should not only be addressing policy fragmentation (para 12) and promoting policy coherence (para 16), but in promoting policies that lead to the most equitable and inclusive outcomes in terms of advancing food systems that provide healthy nutrition for all. In many contexts, we arguably have a degree of policy coherence towards supporting food systems where (especially large, multinational) actors are enabled to make significant profits providing cheap and poor quality food to consumers, in many cases at the expense of smallholders and rural people who lose their rights to land and who are often employed under poor conditions on large plantations. So the issue is not only one of coherence, but also one of policies that promote equity and inclusion.

3. On the guidelines and policy relevant areas:

- Topics to improve consumer awareness, education and choices rightly feature in the draft. At the same time, there seems to be relatively little recognition of the working of markets and prices and how this skews consumer behaviour towards food that is not the most nutritious. Without markets that better reflect the true cost of food – taking environmental and social, as well as environmental costs into account – it is doubtful that it will be possible to change consumer behaviour to a sufficient extent, especially in the case of relatively low-income consumers. In this context, the issue of true cost accounting and reflecting how fiscal and trade policies, as well as those related to land, create inequalities and biased food markets needs to be reflected upon; on this issue, the comments provided by the Honourable Ambassador of Hungary below on true cost accounting are important and need to be taken into account.

- With rising urbanization levels shaping food systems and food demand, as recognized on p.18 of the draft, significant opportunities emerge in terms of promoting rural-urban linkages – both hard (infrastructure) and soft (institutional) – to enable local rural smallholder producers to supply nutritious food to urban residents. The resulting short value chains could reasonably be expected not only to improve nutrition outcomes in rural and urban areas – and maintain traditional healthy dies as opposed to shifting to diets comprising much highly processed goods – but to generate income among rural communities, thereby improving the purchasing power and nutrition of rural and smallholder communities, who are often among those most likely to suffer from undernutrition.

- Finally, it is slightly surprising that there is virtually no consideration of the role of indigenous peoples and indigenous food systems. Advantages of these systems in terms of diversity, nutrition, and agrobiodiversity are well-documented and have been alluded to in the comments by McGill University who provide a range of good recommendations on this topic. In particular, the fostering of indigenous knowledge, partnering with indigenous peoples’ organizations, and respecting their intellectual property rights are important considerations.

## Maria Giulia De Castro, World Farmers’ Organisation, Italy

Dear colleagues,

please kindly find attached WFO contributions to the policy process for your consideration.

With thanks and best regards,

Giulia

MARIA GIULIA DE CASTRO  
Policy Officer  
World Farmers’ Organisation, WFO

**COLDIRETTI:**

**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?**

The first chapter effectively takes into consideration all forms of malnutrition: from undernutrition and hunger to obesity.

The correct functioning of food systems is crucial to ensure safe and nutritious food for all, achieving SDGs.

In this process we should make sure:

* That climate change is considered as the defining issue when it comes to food security and safety, as agriculture is the most affected sector by changes in climate. Access to land, soil health, crop security, stable prices etc. are crucial elements for agriculture to provide food.
* That disaster risks reduction policies take into consideration the impact on food systems and provision of food in a way that prevent the risk of famine in those vulnerable areas that already are affected from undernutrition the most.
* That food value chains are reshaped in a way that is fairer for producers as it is not acceptable that farmers, in several part of the world are the first ones suffering from malnutrition. A fair share of value added for farmers, within the value chain, means also more of their commitment towards practices that are more high – priced (climate smart innovations, less use of chemical pesticides, use of biodegradable plastics etc) but lead to a greater sustainability of the sector.
* That overweight and obesity are treated as an issue to be considered in developed countries in national policies not only related to health, but also education as nutrition education. At the same time, great attention should be paid against the demonization of certain natural products which macronutrients are essential in a balanced diet.
* That waste is considered as an issue occurring in all stages of the value chain. On the production side, meaning the malfunctioning (or absence in certain cases) of infrastructures for storage of food; in the retailer side as paralyzing standards that want natural food to have certain visual characteristics; and on the consumer side as incorrect behavior in purchasing and throwing food.
* That labelling is considered a key element to give consumers the possibility to make informed choices. Simplification of labelling should not result in a misleading information to consumers on the nutrients of food if considered in a balanced diet.

**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 guiding principles listed in Chapter 2 give an appropriate context to the work that has to be done to reshape food systems in order to combat malnutrition.

We propose to add to the list:

* Combat climate change: climate change is one of the main harm to food security, as it jeopardies production and create highly risky environments. Nutrition policies must go hand in hand with efforts to mitigate and adapt to climate change.
* Innovation in all its forms: innovation, not only technological but also innovation of processes, is a key element for food systems to become more sustainable. Innovative methods and technologies can help to better manage inputs for production, increase yields, or help interconnect actors along the value chain so that food is not wasted.
* Fair food value chains: fairer food value chains mean creating the legislative as well as the behavioral framework that enables to give the right value added to all the actors of the value chain.
* Reduce food waste: 1/3 of the food we produce is wasted. That trend has to be reversed if we want to achieve food security. This means we should take into account every stage of the value chain (from farm to fork) to tackle it.

**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?**

Policy coherence is of fundamental importance when it comes to nutrition. Only a holistic and comprehensive approach to food systems and policies can be effective to combat all forms of malnutrition. For these reasons, we must bridge together various sectoral policies that affect food production, processing, distribution, and consumption, and refocusing all actions on the transition to sustainability.

The policy areas listed below should be interconnected:

* Agricultural policies and support to farmers and farmers’ organization in capacity building
* Health (of people and animals)
* Environment protection and climate change mitigation/adaptation
* Disaster risk reduction, prevention and humanitarian intervention
* Organization of food value chains: global/local/short value chains
* Innovation
* Social aspects of nutrition
* Nutrition education

**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 tradeoffs 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?**

The ideal food system is undoubtedly the sustainable one. All aspects of sustainability (economical, environmental and social) are to be taken into account by policy makers in order to build fairer and effective food and nutrition policies.

Challenges are global: a growing world population, climate change, the urbanization and the loss of agricultural soil are just some of the global challenges to which policy makers and actors of the food value chain are confronted every day.

Only through the perfect symbiosis between innovation, quality, transparency, proximity, making farming closer to citizens’ expectations and putting farmers back in a powerful position within a fairer food value chain, we can act to ensure a sustainable food security.

These following examples are two initiatives that have demonstrated to be successful and deserve to be taken into consideration for replication:

1. **Short supply chain/Farmers markets**

* 1. **Best practice/“Campagna amica”:**

Campagna Amica is the biggest European farmers’ markets network (10.000 farms; 1200 markets; 2.7 billion revenues).

The aim of the Campagna Amica initiative is to offer a comprehensive and coherent approach to direct sales, thanks to a single brand to be implemented throughout the country.

Through the “Campagna Amica foundation” producers can sell directly to consumers promoting the distinctiveness of our territories and of those who live and work there.

* 1. ***Rationale***

*With the reorganization of the large-scale retail distribution and a vision of agriculture as a simple provider of raw materials for the industry, often inadequate compensation occurs on the producers’ side, while a lack of transparency affect the whole value chain.*

*Short supply chains and direct selling can represent a mean to establish a direct relationship between the consumer and the producer, valorising the transparency, quality, freshness of the products sold and the link with the local community, at a price that is fairer for everyone.*

*Shortening the food chain has positive consequences from the environmental point of view, cutting emissions and reducing plastics. It favours a more fruitful relationship city-countryside, helping citizens to better understand farming.*

*Direct selling can also contribute to improved behaviour and sensitivity of consumers towards sustainable consumption that also takes into consideration the working conditions at the production stage, together with the attention to buy healthier food, promoting the consumption of fresh seasonal fruits and vegetables.*

1. **Value chain contracts**

* 1. **Best practice/Food chain contracts**

Coldiretti (the largest Italian farmers’ organisation) promoted the creation of food chain contracts that gathers different operators (farmers, industry etc.), in order to create a fair food chain that ensure fair revenues for farmers.

2.2 ***Rationale***

Farmers are one of the actors of usually very long supply chains, where they are often squeezed by other players, losing bargaining power over large suppliers and buyers and their freedom to choose what to grow, how to grow it, and for whom. Consolidation across the agri-food industry has made farmers even more reliant on a few suppliers and buyers, further squeezing their income. Value chain contracts, bringing together all the actors of the value chains (from farmers to retailers) can help farmers to move up the value chain and add more value to their work before selling the product to the rest of the chain. Through value chain contracts, distinctiveness of territories can be valorised, thus creating value for rural communities.

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

Communication and mainstreaming are crucial to make sure that these guidelines are accepted, adopted and understood by all interested actors.

They should not be crystalized in institutional policy making but they have to reach all actors involved in the shaping and functioning of food systems. A bottom up approach to their implementation should be considered fundamental to their effective usage.

Farmers, as provider of food worldwide, should be considered the most relevant actors to help shape and implement those guidelines

**GROENEKRING:**

**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?**

We think that two policies areas are missing, which are very important for food security, quality and safety and should be included:

* Generation renewal and the encouraging of young farmers to take over: This problem, which occurs in many countries around the world might end being the main challenge for the agricultural sector, as this might mean the end of family farming. Nevertheless, science proves that family farming is the largest guarantee for food quality, safety and security. There cannot be healthy food in the future if there are not farmers.
* The second one is education for farmers. Educated farmers have a lot more capacity to provide healthy food and to adapt to the newest scientific insights. Educated farmers are a lot more aware of their position in the food environment and how and why they produce, which leads to more considerate choices and hence to a higher level of food security, safety and quality.

**MUGEDE:**

**1. Chapter 1 accurately reflect the current situation of malnutrition and its causes and related impacts, particularly in accordance with the objectives and goals of Agenda 2030? What are the underlying problems that currently prevent food systems to deliver a healthy diet?**

Fighting malnutrition in all its forms - malnutrition, micronutrient deficiencies, overweight and obesity - is one of the biggest global challenges facing countries today. Despite the undertaken efforts and initiatives aimed, from a strategic point of view, several instruments, problems remain (structural) whose treatment requires a conceptual approach as well as strategically oriented, coordinated and shared practices. According to the Food and Nutrition Security Strategy 2018-2025 (ESAN III), Mozambique has a chronic food insecurity rate of 24% to 43% of chronic malnutrition and acute malnutrition 6%. Significant indicators of food security and nutrition worrying situation.

According to the Sustainable Development Goals (SDGs), 2030 should end all forms of malnutrition; double agricultural productivity and incomes of small food producers, particularly women, indigenous people, subsistence farmers, pastoralists and fishermen, including through equal access guaranteed to land and other productive resources such as knowledge, financial services, markets and opportunities to add value and non-agricultural employment; ensure sustainable food production systems and implement resilient agricultural practices that increase productivity and production, to help maintain ecosystems, to strengthen the ability to adapt to climate change, extreme weather, droughts, floods and other disasters.

According to ESAN III, food and nutrition insecurity (FNiS) is associated with poverty, so its suppression involves the breaking of the cycle of poverty. It is pointed out three categories of causes for FNiS in Mozambique, namely: a) Immediate causes;

* Low food availability at household level (households);
* Poor health;

1. Causes adjacent; and
   * limited access to food;
   * Low availability and access to health services;
   * inadequate immunization coverage;
   * High maternal mortality rate;
   * High levels of absolute poverty;
   * Low access to safe water and sanitation;
2. root causes,
   * Low level of education and high illiteracy rates;
   * Poor governance;
   * Taboos, beliefs, traditional practices and negative religious; and
   * Low availability of structural funds.

What are the underlying problems that currently prevent food systems to deliver a healthy diet?

The underlying problems that currently prevent food systems to deliver a healthy diet are related to the decisions taken by the actors at any stage of the food supply chain that have implications for other stages and interventions throughout the food supply chain can affect the availability, accessibility, safety and acceptability of nutritious food for a healthy diet.

Urban and peri-urban areas face more specific FNiS problems. Without neglecting its focus on rural areas, the following issues are reflected more accurately in urban and semi-urban areas:

* misleading advertising in relation to food products;
* Labels in languages not dominated by consumers;
* absence of labels or insufficient information labels;
* Poor hygiene in eating houses, markets, bazaars, etc;
* Absence or inadequate state landfills;
* Contamination of food by means of water, among others;
* Products with harmful effects in circulation:
* Deterioration of food, lack of refrigeration capacity, poor maintenance or negligence;
* Poor sanitation;
* Tampering on the market - match-fixing scales; weight, volume or quantity less than the stipulated; - Price speculation;
* Decrease in the real value of wages (disproportionate wage increases to higher product prices).

Furthermore, rural areas face more specific FNiS problems related to:

* Low income to meet basic food needs;
* Limited knowledge and familiarity with the ESAN by the main stakeholders, including communities and their representative organizations;
* Occurrence of shocks / economic crisis;
* recurrent and intense occurrence of calamities / disasters;
* Limited approach of socio-cultural factors among others.

**2. What should be the guiding principles to promote sustainable food systems that improve nutrition and enable healthy eating? What are your comments on the principles outlined in Chapter 2? they are best suited to their national / regional contexts?**

1. The guiding principles to promote sustainable food systems that improve nutrition and healthy eating are possible:

According to CFS, the food systems can serve and support multiple objectives within the three dimensions of sustainable development: economic, social and environmental. The main principles are:

* Systemic and holistic, evidence-based approach. And promote a systemic, holistic approach, based on evidence that considers food systems in their entirety, seeks to maximize both results in all dimensions of sustainability and look at the multidimensional causes of malnutrition in all its forms.

Policy coherent and tailored to the context. Contribute to the formulation and implementation of coherent policies based on specific evidence to the context and related investments through coordinated action among the different actors and in all relevant sectors internationally, regional, national and sub-national levels.

* Healthy people, healthy planet. Promote policies that are intended to improve living conditions, health and population welfare and improve the sustainability of production and consumption, as well as the protection of biodiversity and ecosystems.
* Gender equality and women's empowerment. Promote gender equality and empower women and girls while respecting their rights and considering the importance of creating the conditions for a strong involvement of women in the formation of food systems that can improve nutrition.
* knowledge of nutrition and awareness raising. Strengthen nutrition education at individual and community levels to facilitate producers, food processors and consumers’ decisions and promote informed choices about food for healthy eating habits.
* Realization of the right to food. Promote the progressive realization of the right to adequate food in the context of national food security through sustainable means, equitable, affordable, flexible many food systems.
* Training. Strengthen human and institutional capacity, particularly among actors nutrition and food systems, to deal with all forms of malnutrition and expand coverage, the impact and sustainability of nutrition programs.

According ESAN III principles to be observed in its implementation are:

* Multisectorality

Food and nutrition security are themes of interest from various sectors, imposing, therefore, that its conceptual and practical approach, covering all relevant sectors.

* Multidisciplinary

Various disciplines and knowledge areas are encompassed in the treatment of food and nutrition security matters. Taking into account these disciplines and areas of knowledge is essential for all relevant dimensions.

* Inclusion

A dignified life undergoes a diet and a decent nutritional status, food and nutritional security. It is an issue that concerns everyone and therefore no one can be excluded in their treatment.

* Participation

Everyone has an interest in the subject of food security as well as a potential contribution to make. Provide an opportunity for participation is to create conditions to fully achieve the objectives set.

The contribution to the implementation of various initiatives reflect a shared ownership of initiatives and a communion of will of the successes and risks that may arise in the implementation process.

* Knowledge sharing

Share data and information is essential for the intervention of each and all are based on knowledge of the lessons and experiences of the past, the present reality and future aspirations and the decision-making process is not limited by uncertainty.

* Integrity

The observance of principles of common sense and ethical values inspires trust and respect and provides a delivery environment and collaboration among the parties involved and contributes to the effectiveness of initiatives.

* Co-responsibility

Although the various types of development actors have a different role in addressing the food and nutritional security issue, everyone has a responsibility to this subject is effectively a national agenda.

* Accountability

To all those who participate directly or indirectly, have the right to know and to comment on how the resources are used for different purposes, through a process of providing systematic and transparent accounts.

* Transparency

Everyone must have access to information that is made and intends to make in sufficient detail and in good time so that they can assess the extent to which were taken into account their interests and a social justice basis if can express their views, whenever necessary.

* Coordination

Coordination, both vertically and horizontally, lets you bring all development actors at the same level, to create a shared vision and provide the harmonization of initiatives as well as synergies in the interventions.

* Holistic approach

To take into account the various dimensions of food and nutrition security issues, a holistic approach must be used that allows stakeholders to develop a more comprehensive and systemic view around the SAN.

* Dialogue

The sharing and discussion of ideas, views and issues of treatment options enable the identification and implementation of best standard solutions and more effective and drive the commitment of the various parties involved.

* Sustainability

The initiatives designed and carried out the level and intra-sectoral or inter-sectoral must be sustainable, ensuring that they remain after the end of external assistance that have relied upon its establishment and implementation.

* Realism

The conception, design, adoption and implementation must be based on realistic basis and take into account the socio-cultural and economic context, circumstances and constraints that the various initiatives occur.

* Comments on the principles described in Chapter 2?

The principles described in Chapter 2, are the basis for promoting sustainable food systems.

They are best suited to their national / regional contexts?

The principles should be appropriate to the reality of each country to respond to the interests   
 of its citizens.

**3. Taking into account the policy areas identified in Chapter 3 and the necessary elements suggested in paragraph 41 of the Zero Draft, that policy entry points should be covered in Chapter 3, taking into account the need to promote policy coherence and political fragmentation Address?**

The policy entry points should be covered in Chapter 3, considering the need to promote policy coherence and political fragmentation are:

* New policies should be developed to encourage retailers to provide more nutritious foods affordable prices, and to purchase local products, mainly small producers rewarding prices, bringing a positive impact in terms of eating patterns and nutritional outcomes. At the same time, local farmers should be supported to meet the safety and / or quality standards that could allow them to reach broader markets and higher profits for their products. Policies should also consider ways to restrict the marketing of products rich in fat, sugar and salt.
* agricultural production models sensitive sustainable and nutrition, agricultural policies and strategies, promotion and sustainable use of agro biodiversity, sustainable use of the forest, wildlife, aquatic resources, subsistence producers women means

**4. Can you provide specific examples of new policies, interventions, initiatives, alliances and institutional arrangements that must 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 opinion, what would be the food system "ideal" look like, and what goals / metrics can help guide policymaking?**

The view, the food "ideal" system look like, and what goals / metrics can help guide policy formulation are:

* Integrate women because they contribute to food systems, not only with his work, but also with their knowledge of agricultural practices and biodiversity.
* They are involved in agricultural activities and non-agricultural and play a central role in the management of natural resources and food production, processing, preservation and marketing. Rural women diversify sources of income and ensure food security, nutrition and well-being of their families and communities.

**5. How do these Voluntary Guidelines be more useful for different stakeholders, particularly at national and regional levels, once approved by CFS?**

When the guidelines are adopted by the CFS, especially at national and regional levels, it should be suitable conditions of each country.

**NORWEGIAN FARMERS’ UNION:**

**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 policy-making?**

* Regarding chapter III, 43 j) on AMR, we miss a reference to policies to promote healthy animals. Healthy animals do not need antibiotics
* Chapter III, 1-43 k): A strengthening of the farmers role in the food supply chain could make him or her more resilient to prize volatility and give more stable prizes, something also regulation of prices could do
* Under 1-46 support for smallholder local farmers is essential. Regarding national restriction of marketing of products with high fat, sugar and salt this could lead to negative effects like moving production out of the country and misleading the consumer to for instance low fat/low sugary products with no nutrition. For instance, Diet Coke instead of milk. Better labeling could have positive effect on nutrition
* To 2-48 2a): Better coherence between trade policy and nutrition is essential. It should be added that trade policy must not undermine local food security
* Under 2-48-2b) it could be added that these taxes must not undermine food production, like stated in the Paris agreement

## Hannah Graham, World Association of Girl Guides and Girl Scouts, United Kingdom

Girl Powered Nutrition (GPN) is a global programme run by the World Association of Girl Guides and Girl Scouts (WAGGGS) through their Member Organisations (MO) in four countries – Madagascar, the Philippines, Sri Lanka and Tanzania – chosen because of their high prevalence of adolescent malnutrition amongst girls. WAGGGS is the largest voluntary movement dedicated to girls and young women in the world with 10 million members across 150 countries.

Funded by Nutrition International, the GPN programme promotes girl led change through education on the importance of a balanced, healthy lifestyle and enabling girls to be agents of change at local, national and global levels in the fight to stop malnutrition continuing from one generation to the next.

By mid-2020, our aims are:

* For 195,000 Girl Guides across all the participating MOs to have completed the GPN badge and have improved knowledge and attitude to make healthy choices
* For 390,000 additional girls/community members to have improved knowledge and attitude to make healthy choices for girls and themselves through community actions
* For young women (Advocacy Champions) to attend and speak out at national and global events as experts in adolescent nutrition to influence decision makers that adolescent nutrition is prioritised
* As a result of the GPN programme we want a future where healthy and well-nourished girls will be able to reach their full potential and will feel confident and empowered to take actions to break the intergenerational cycle of malnutrition.

After consultation with our girl guide ‘Advocacy Champions’ around the world, we are responding to the Committee on World Food Security consultation on the development of the voluntary guidelines on food systems and nutrition because we know that girls need to be healthy and well-nourished if they are to reach their full potential. Part of the Girl Powered Nutrition programme is advocacy: influencing national and global decision-makers of the importance of making girls nutrition a global priority. WAGGGS is using programme findings to influence decision makers and create global policy changes. Please see attached file for our consultation response.

**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?**

Our global Advocacy Champions across Madagascar, the Philippines, Sri Lanka, and Tanzania agree that Chapter 1 does adequately reflect the current state of malnutrition and its related causes and impacts, particularly as it is in line with the goals and targets of the 2030 Agenda. However, it fails to identify the acute challenges that are associated with adolescent nutrition. Particularly in Chapter 1 item 3, there is no mention of adolescent nutrition for Iron Deficiency Anaemia (IDA) amongst the list of affected groups. Some of the underlying problems that currently hinder food systems to deliver healthy diets are bad agricultural practices, poor infrastructure, environmental pollution and a poor labour market.

Madagascar is experiencing a range of malnutrition challenges. Key issues include eating too little and not eating enough vitamins and minerals. Nearly 50 per cent of girls under the age of five are too short for their height and do not get enough nutrition[[81]](#footnote-81). This can affect their educational achievement and health status in adult life. Most Malagasy households do not have access to enough good quality food. When rice gets too expensive, there is either not enough food for everyone to eat or families choose to eat other foods like corn or sweet potatoes. In Madagascar, poor nutrition in young people is also caused by unemployment. Lack of income causes young people to eat from the street sellers, where the food is cheap but also contaminated due to poor hygiene and cleanliness of storage rooms. It is compounded by the current existence of a certain laxity in respect of standards and regulations for food safety.

Sri Lanka is experiencing a range of malnutrition challenges including eating too little, eating too much and not eating enough vitamins and minerals. One-third of women aged 15-49 do not receive enough iron in their diets leaving them feeling tired and lacking the energy to be the best they can be[[82]](#footnote-82). In contrast to this, one-third of women over 20 are overweight or obese[[83]](#footnote-83). Even though there is a lot of awareness and education about good nutrition, nutrition habits as a skill is not encouraged amongst young girls. Many girls feel that they have access to enough food, but not all of it is healthy. Girls often eat on the go, as they move between school and extra-curricular activities, however many food options offered in local universities (which are cheaper and subsidised) are very unhealthy and sometimes unhygienic. Due to them often eating on the go and ignoring meal times because of the high-pressure environment in schooling to succeed, girls are at risk of development of gastritis.

*“In Sri Lanka, a third of the population of teenage girls are iron deficient and obese. Moreover girls receive only 69 percent of the energy requirement for a day recommended by the Sri Lanka health ministry, and children consume only 16 percent of the Vitamin A requirement under the ministry's Recommended Dietary Allowance” Nabeela Iqbal, GPN Advocacy Champion, Sri Lanka Girl Guides Association*

Poor nutrition remains a critical developmental challenge in Tanzania, with girls experiencing a range of malnutrition challenges including eating too little and not eating enough vitamins and minerals. Adolescent girls are more likely to be undernourished than adult women. They are more likely to be thinner than any other age groups[[84]](#footnote-84). Almost half of children under five do not eat enough Vitamin A[[85]](#footnote-85), which can lead to night blindness. Girls’ vulnerability to child marriage, early motherhood and limited educational and employment opportunities also puts them at higher risk of suffering from malnutrition. In rural areas, women are less involved in decision making and are less of a priority for household food distribution exposing them to risk of not accessing healthy food. If there is no improvement in the nutrition situation by 2025, Tanzania’s estimated economic productivity losses will total some US$20 billion. Addressing nutrition issues and inequality is therefore of vital importance for girls, and for the nation at large.

*“I agree with Chapter 1 and the issues here are relevant to my society. In addition there is also gender inequality in provision of food and health services and also food taboos and poverty are the main causes of malnutrition in adolescent girls” Valentine Muhindo, GPN Advocacy Champion, Tanzania Girl Guides Association*

The Philippines is experiencing a range of malnutrition challenges including eating too little, eating too much, and not eating enough vitamins and minerals. Almost one-third of girls in primary school do not get enough iodine[[86]](#footnote-86) – a nutrient often added to salt and is also naturally found in animal products. Iodine is needed for neurological development. There is also a high prevalence of iron deficiency anaemia amongst girls where 4.2 million (16%) women of reproductive age are classified as anaemic5. A growing number of girls and adolescents are also overweight or obese due to the wide availability of unhealthy foods, particularly in urban areas. Girls are exposed to unhealthy food adverts on social media and television.

**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 guiding principles are relevant and achievable. We are particularly keen to see the inclusion of gender equality and women’s empowerment being included in relation to malnutrition practices. At WAGGGS, we know that girls are disproportionately affected by poor nutrition. Ensuring that girls have good knowledge, attitudes and behaviour about nutrition can help to stop malnutrition continuing from one generation to the next. Our vision is that healthy and well-nourished girls are able to reach their full potential and are empowered to take actions to break the cycle of malnutrition. Below are the principles and context of Girl Powered Nutrition which complement the principles outlined in the Zero Draft.

**Good food is the key to good health and development.** After infancy, adolescence is the most rapid period of growth with the highest nutritional needs, so access to healthy and nutritious food is crucial. However, a wide range of social, economic and biological factors mean that girls are disproportionally affected by malnutrition. In some families, girls are often fed last with the least nutritious food and there may be community taboos or a lack of awareness around menstruating girls, which limits what they eat at a time when iron-rich food is key.

**Addressing gender inequality in tackling malnutrition**. Child marriage and early pregnancy contribute to high levels of anaemia and malnutrition in girls and young women. Poor nutritional status increases the risk of complications during pregnancy and contributes to poor foetal development. This then perpetuates the intergenerational cycle of malnutrition. Young women often eat less and last and when women have status and control over household income they tend to invest more in food, education and health. This can benefit the whole family, but low status and limited access to income or assets such as land increases the likelihood of ongoing malnutrition. The end result is girls and young women are unable to fully participate in life and reach their full potential.

**Using the universal life-cycle approach to combat malnutrition**. Data on adolescent nutrition was highlighted as a major gap in the Global Nutrition Report 2017 despite adolescence being recognised as a critical point in the nutrition life cycle. Most available data is disaggregated by ages 0-5 and 15-49. Girls and adolescents age 6-14 are omitted entirely and those aged 15-19 are included in the same group as adult women, leading to the assumption that adolescent girls have the same needs and challenges as adult women. WAGGGS is in a prime position to shift the narrative to a lifecycle approach and show that adolescence is a key period in a girl’s life cycle both in terms of her own health and for her future life as an adult, and even for the health of the next generation. To support young adolescents, there is a real need to move the focus from the ‘first 1000 days’ into a more holistic ‘first 8,000 days’.

*“Girls believe nutrition is an insignificant problem. It is the contrary; improper attention to nutrition is a major factor holding them back in allowing them to be their best selves. Education and awareness on these issues is the sustainable solution which is why Girl Powered Nutrition is so important.” Nabeela Iqbal, GPN Advocacy Champion, Sri Lanka Girl Guides Association*

**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?**

Nutrition sensitive policies should aim to improve the underlying determinants of nutrition outcomes through targeted programmes and women’s empowerment. Some entry points can be inspired by the following publications:

Scaling Up Nutrition (SUN) in Practice – Social Mobilisation, Advocacy and Communication for Nutrition – July 2014 <https://www.unicef.org/cbsc/files/Scaling_up_nutrition.pdf>

SUN in Practice – Empowering Women and girls to improve nutrition: Building a sisterhood of success – May 2016

<http://docs.scalingupnutrition.org/wp-content/uploads/2016/05/IN-PRACTICE-BRIEF-6-EMPOWERING-WOMEN-AND-GIRLS-TO-IMPROVE-NUTITION-BUILDING-A-SISTERHOOD-OF-SUCCESS.pdf>

SUN Quality National Plan Checklist on the criteria and characteristics of ‘good’ national nutrition plans

<https://scalingupnutrition.org/news/the-first-ever-checklist-for-quality-national-nutrition-plans-is-launched/>

**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 policy-making?**

We would like to highlight particular policies in two of our partner countries: Madagascar and Sri Lanka. Programmes like Girl Powered Nutrition advocating for national and global change are an important part of Madagascar’s attempt to fight malnutrition.

Madagascar’s strategy is guided by the National Action Plan on Nutrition III. Launched in 2005, the first phase outlines nutrition activities with 14 goals. Eight of these have been implemented: 1) promotion of breastfeeding and complementary food, 2) integration of the community in nutrition, 3) fight against micronutrient deficiency 4) integration of nutrition intervention in primary healthcare, 5) care for acute malnutrition, 6) improvement of household food security, 7) integration of school nutrition, and 8) improvement of communication on nutrition.

Madagascar has partially implemented the four remaining strategies: 1) preparation and intervention for nutrition emergency, 2) a national system of nutrition and food supervision, 3) development of the national capacity building, and 4) nutrition intervention relating to emergent problem (HIV/AIDS) and non-communicable disease.

The remaining two interventions have not started. These focuses on integrating development initiatives and providing legislative framework around food and nutrition.

Phase two of the plan outlines steps to address malnutrition, the food and nutrition security for vulnerable households, and the coordination and improvement of the nutrition sector growth.

Phase three was launched in 2017 (NNO, 2017) and focuses on deepening the phase two interventions as well as improving access to health services and safe drinking water and sanitation, with special attention on pregnant and lactating women and adolescent girls.

Raising public awareness of the National Plan of Action on Nutrition is key to its overall success. This is being addressed, in part, by community sensitization through television, radio, and print media. The National Plan on Nutrition is now at risk due to changes in the Government. New policies, initiatives and interventions only work if they are followed through in full and not dependent on political movements.

*“Advocating for improved nutrition ensures decision makers invest more in girls’ nutrition, improving access to healthy foods for as many as possible. Girls are powerful and can contribute to changing their world. My goal is to empower as many girls as I can, to speak about the vicious cycle of malnutrition and work towards creating a world where their health is a priority.” Hanitra Rarison, GPN Advocacy Champion, Skotisma Malagasy Zazavavy, Madagascar*

In Sri Lanka, there have been various policy statements by the Government, in particular the Ministry of Health who stated they will achieve the following by 2025 through their ‘National Strategic Master Plan’:

1. Health issues of adolescents have not been attended:  Study the health needs of adolescents and establish a programme to address the issues identified

2. School Medical Inspections (SMI) to be revisited, counselling, health promotion: Enhance School Medical Inspections with special emphasis on counselling and health promotion towards:

* Reduction of malnutrition (Obesity, under nutrition)
* Reduction of morbidity due to adolescent pregnancy
* Reduction of mortality due to adolescent pregnancy
* Reduce anaemia among adolescents
* Reduce STIs
* Reduce psychological problems among adolescents
* Reduce mortality due to injuries (intentional and non-intentional)
* Achieve optimal health among adolescents through healthy life style

*“The ideal food system should involve discipline labours, adequate infrastructures and effective agricultural practices, not taking things for granted.” Ummy Kamal, GPN Advocacy Champion Tanzania Girl Guides Association*

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

These Voluntary Guidelines will be invaluable to the non-profit sector, particularly for WAGGGS and our girl guide Advocacy Champions, across the globe to provide or increase awareness in improved and healthy food and support their advocacy efforts going forward. The ‘Implementation and Monitoring of the Use and Application of the Voluntary Guidelines’ section is paramount to ensuring that CFS stakeholders and governments use these guidelines in collaboration with other relevant initiatives and platforms, and in new projects, to support the development and implementation of national policies, programmes and investment plans across all sectors to address the multiple challenges of malnutrition in all its forms. We would recommend some form of quality control in monitoring movements in government policies as a direct result of these Voluntary Guidelines. Monitoring movements in national and global nutrition policy will not only support our young activists but also support and influence the scale-up of the Girl Powered Nutrition programme after May 2020.

With the endorsement of CFS and other global nutrition movements and organisations, the Voluntary Guidelines will gain more attention from governments when setting their national policies. We would encourage the CFS to gain the backing of a great number of nutrition-focused organisations, particularly those working on adolescent nutrition, in the release of these guidelines to ensure they are widely-spread and accepted. In terms of how WAGGGS can help, we are the largest global voluntary movement dedicated to girls and young women in the world. We reach 10 million members across 150 countries. Currently, Girl Powered Nutrition is to reach 390,000 girls across four countries. We will utilize the Voluntary Guidelines to advocate for better standards of adolescent nutrition and as backing for our campaigns and lobbying efforts in these four countries and beyond.

## Ekin Birol, HarvestPlus, United States of America

Dear CFS Colleagues,

So many congratulations on this comprehensive Zero Draft of the Voluntary Guidelines on Food Systems and Nutrition. Thank you very much for including biofortification in Part I, under (1) Production Systems paragraph (h) as one of the technologies that should be scaled up to improve consumer access to healthy diets and better nutrition outcomes.

Since conventionally bred (i.e., non GMO) biofortified crops and foods made thereof are now being scaled up along the crop supply chains; biofortified foods could also be included in other parts of the guidelines, including Part I, section(1) Production Systems (a), (b), (f), (i), (g), (k); (3) Processing and Packaging (a); (4) Retail and Markets (a) and (b); in Part II, section on Availability and Physical Access (b) and (c); Economic access/affordability (c), and under Food Quality and Safety (b).

Given the evidence-based approach taken by the CFS in development of these important guidelines,  I would like to refer you to the latest evidence on the nutrition and health impacts, adoption, consumer acceptance and cost-effectiveness of biofortification (<https://www.harvestplus.org/evidence-document>).  Furthermore,  21 countries have now included biofortification in their various national policy and strategy documents (list of countries and policies/strategies are available from HarvesPlus, [www.harvestplus.org](http://www.harvestplus.org/)). These could be highlighted as examples of policies/strategies for improving food systems and nutrition (and learnings could even be shared among member countries through the forum mentioned in Paragraph 59).

Many thanks for your consideration and warmest regards,

Ekin Birol, PhD, Director, Impact and Strategy, HarvestPlus

## Arun Baral, HarvestPlus, United States of America

Dear CFS,

So many thanks for undertaking this important and transparent policy process for the development of Voluntary Guidelines on Food Systems and Nutrition, and for providing us with this forum for feedback.

I would like to commend you on this excellent Zero Draft which not only highlights the urgency of tackling malnutrition in all its forms, but also provides several solutions for doing so along the whole “production to consumption” supply chain for food systems. Your inclusion of key issues such as equity and climate change challenges, and the need to conserve agrobiodiversity makes the guidelines relevant not just today but for many years to come.

As the CEO of HarvestPlus (<https://www.harvestplus.org/>), the global leader in biofortification technology and policy, and the convener of CGIAR breeding centers and 400+ other global partners working on biofortification, I was especially pleased to see your inclusion of biofortification in Part I, under (1) Production Systems paragraph (h) as one of the technologies that could result in “improvements in productivity enabling better access to healthy diets and nutrition outcomes while minimizing environmental impact.”

Biofortification is now a proven solution for improving food systems through their backbones, i.e., through the key staple(s) from which the majority of the calories consumed come – regardless of age, gender and socio-economic status of the consumer. You can see the latest evidence on the health and nutritional impact of biofortification here: <https://www.harvestplus.org/evidence-document>, and the availability of all of the released and about to be released, conventionally-bred (i.e., non-GMO), high-yielding, climate-smart and nutritious biofortified crops globally here:

<https://www.harvestplus.org/sites/default/files/publications/HP_2019_CropMap_update_v5_0515.pdf> . To date 21 countries have included biofortification in their national policies, and biofortified crops are benefiting almost 40 million people globally (see our latest annual report here:

<https://www.harvestplus.org/knowledge-market/in-the-news/catalyzing-biofortified-food-systems-2018-annual-report> ). Biofortification is an equitable intervention, since unlike other nutrient rich foods – such as animal sourced foods – which are often reserved for male members of a household – biofortification targets the staple crops consumed by all household members. Finally biofortified crops are not only bred to be climate smart/climate adaptive, but also to provide higher levels of micronutrients, which is a much needed intervention as the recent evidence (see, e.g., <https://www.downtoearth.org.in/news/food/high-co2-emissions-reducing-nutrients-in-rice-wheat-66143>) shows that nutrient content of our staple crops are eroding due to increasing CO2 concentrations.

Given all this evidence, I would recommend you to consider including biofortification in other sections of the guidelines, such as Part I, section(1) Production Systems (a), (b), (f), (i), (g), (k); (3) Processing and Packaging (a); (4) Retail and Markets (a) and (b); in Part II, section on Availability and Physical Access (b) and (c); Economic access/affordability (c), and under Food Quality and Safety (b).

If you have any follow up questions, please do not hesitate to contact me. We would also be delighted to participate in the forum mentioned in Paragraph 59 and to share with other stakeholders our various resources (such as the Biofortification Priority Index [ [https://bpi.harvestplus.org](https://bpi.harvestplus.org/)] for identifying high impact target countries for each biofortified crop) and our know-how and lessons learned in introducing and scaling of biofortified crops and foods along the staple crop supply chains.

Sincerely yours,

Arun Baral

## Manuel Moñino Gómez, ESDN PH – European Federation of the Associations of Dietitians, Netherlands

**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?**

It perfectly reflects the current situation of malnutrition, however, we believe (point 9) that it would be necessary to say that, in addition to the  food choice, consumer's behaviour is key when it comes to reducing household food waste.

On the other hand, we believe that point (10) should mention the importance of promoting food environments with less pressure and exposure to unhealthy foods (low price policies, commercial offers and advertising), especially in groups with low income  and lower educational level and health and food literacy.

Among the underlying problems that currently prevent food systems to deliver healthy diets, there are the high capacity of the food industry to influence consumers' food and beverage choices, the low profile of governments in implementing comprehensive food policies as regard consumers protection such as regulations to limit access to unhealthy food in school, workplace or health settings; the [application of financial incentives and disincentives in food choice](http://www.efad.org/media/1780/fiscal-measures-which-influence-consumption-in-europe_with-appendix.pdf); the implementation of front of pack labelling systems to facilitate healthy foods choices; initiatives to improve consumer food literacy; agricultural policies that prioritize environment and health as well as economic sustainability; inclusion of more nutrition and dietetic professionals in multidisciplinary health teams; and policies to promote small farms production.

**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 guiding principles are adequate and relevant, we just need to mention the term ["food literacy" in the principle "Knowledge and awareness on nutrition", since it is a broader and more comprehensive term than "nutrition education", and because it takes into consideration aspects that affect food systems more clearly.](http://www.efad.org/media/1573/efad-food-literacy-fact-sheet.pdf)

On the other hand, although there is no consensus on the definition of a "healthy diet", it is important to consider key aspects such as "contribute to promote, preserve or restore health at all stages and physiological situations throughout the life span", "It must be based on safe food mainly fresh and minimally processed, with little or no presence of other highly processed low nutritional quality" and "must be sustainable, adjusted to the culture of the people, affordable and tasty."

**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?**

We believe that the identified policy areas are adequate, but we consider it important that some aspects are collected:

*PART 1: FOOD SUPPLY CHAINS*

Production systems - 43, section f: we believe that linking farms to schools is positive, but they should also be linked to the community by promoting short food chains so that access to food produced in the closest geographical environment is easier, while contributing to a lower impact on the environment reducing transport and promoting and protecting small producers value chains.

Handling, storage and distribution - 44 -, section a: Until such time as social measures are in place to ensure that food banks are not required we , we believe food donation in production and distribution settings should be encouraged, as well as facilitating the task of the Food Banks to receive and distribute safe and nutritious foods that are of low commercial quality, as well as study fiscal measures and / or incentives to the food donation.

Processing and packaging - 45 - We believe it is important to differentiate the terms "sugar and sugars" from "free sugars" and suggest that "free sugars" be mentioned instead of "sugar or sugars" as a substance to be limited together with industrially produced trans fats, saturated fats and salt.

On the other hand, in section a, national or regional policies conducive to the reformulation of products and recipes high in free sugars, satured and trans fats y/or salt should take into consideration the difficulty of most small and medium-sized enterprises to develop and implement measures to reformulate their products, compared to large food and beverage operators. An idea would be to have some funds or initiatives from sectoral associations to be invested in reformulation projects of SMEs.,

Likewise,[we suggest a new policy-relevant area associated with packaging that guides front of pack labelling systems to facilitate healthier choices and/or alerting to those food and beverages that can contribute to an excessive consumption of salt, saturated and trans fats, and free sugars.](http://www.efad.org/media/1646/contributions-efad-fop-development.pdf) The use of colour code schemes such as traffic lithg, nutriscore, etc., or symbols as keyhole, or alert octagons, all of them based in accurate nutrient profiling can help consumers to quickly compare the nutrient content of a given nutrient or the nutritional value as a whole of any food in the same category.

Retail and markets - 46, section b: in addition to policies to restrict the marketing of products with a high content of fat, sugar and salt, subsidies should be promoted which would facilitate the marketing and access to healthy food, especially those produced in the closest geographic environments.

PART 2: FOOD ENVIRONMENTS

Economic access - 49, section d: we believe that it is important to facilitate, from the legal and regulatory point of view, the donation of food in the different phases of the food value chain, as well as to facilitate the task to the Food Banks to receive and distribute safe and nutritious foods that have reduced commercial quality, as well as assess the application of fiscal measures and / or incentives for food donation. However, we believe that food banks should be a temporary measure until such time as governments introduce adequate social funding to ensure that people can purchase their own food.

Promotion and publicity. 51, section a: We believe that in addition to improving the school food environment, regulations and policies should be established to avoid food swamps in the immediate vicinity of schools.

On the other hand, we suggest a new policy-relevant area related to food waste, to review in depth the labelling rules that govern the use of “preferred consumption date” and “expiration date” as well as make an effort to train consumers in its correct interpretation in order to improve food safety and reduce food waste.

Quality and safety - 52, section b: [national or regional policies conducive to the reformulation of products and recipes high in free sugars, satured and trans fats y/or salt should take into consideration the difficulty of most small and medium-sized enterprises to develop and implement measures to reformulate their products.](http://www.efad.org/media/1598/150143-efad-response-to-call-on-food-reformulation.docx) Larger operators can more easily apply changes in the composition of food and beverages.An idea would be to have some funds or initiatives from sectoral associations to be invested in reformulation projects of SMEs.,

*ART 3: CONSUMER BEHAVIOR*

Education and information on food and nutrition - 55. [In addition to nutrition training for health professionals and others involved in the provision of health services, it is essential that health systems have professionals with specific training in nutrition and dietetics, within the framework of multidisciplinary teams, since it has been proven to be cost-efficient.](https://diamundialdietistanutricionista.org/wp-content/uploads/2018/11/impacto-coste-beneficio.pdf) Dietitians are the key health professional to translate the science of nutrition and dietetics into practice, providing people with the most appropriate choice for their health and well-being, considering their culture socio-economic status and education.

Likewise, as mentioned above, it is important to incorporate the term ["food literacy" as a key element in training consumers to make responsible health decisions associated with food consumption](http://http:%20/%20www%20.efad.org%20/%20media%20/%201573%20/%20efad-food-literacy-fact-sheet.pdf). Dietitians are key players in the food literacy of the people as well as in the development and implementation of public policies that facilitate access to healthy foods and ensure sustainable food systems.

Section b, on food-based dietary guidelines: - sustainability should be a criterion to be considered when establishing food-based dietary guidelines, not only for the promotion of consumption of food with a lower ecological, water, carbon and environmental footprint, such as fresh plant foods especially highlighting fruits, vegetables and pulses, but also incorporating tools to reduce household food waste.

Social norms, values ​​and traditions - 56, section b: - traditional food culture should be the backbone of the development of food-based dietary guidelines, so as to promote traditional diets, popular gastronomy and to encourage the recovery of traditional varieties of foods which have lost market share to more commercial varieties

**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?**

Some examples of initiatives to facilitate compliance with the proposed policies:

* Civil society movements promoting food system based on new relations between consumers, small local food producers and rural communities, such as Slow Food.
* Urban farming initiatives integrated in most of the main municipalities’ strategic actions.
* Actions to improve soil health incentivizing the involvement of small farmers using soil-conservation agriculture methods.
* Awareness of food retailers and wholesalers to reduce GHG by promoting local products, improving access to organics, reducing plastics and promoting buying in bulk, providing eco and fair-trade food stuffs, etc.
* Making food chain shorter by promoting street markets where local farmers can sell their products.
* Reducing food waste and losses - Donation of food surpluses to social supermarkets to be given to people in need or selling them at low prices to general population, APPs to share food or selling "ugly foods" at affordable prices.
* Provision of sustainable diets by using green public procurement for school meals programs or hospital food services.
* Integrating sustainability as transversal topic in food based dietary guidelines as the Swedish Government does.
* National regulations to make food systems healthier, fairer and more sustainable, such as the newly French Food Bill also known as Egalim Bill which establishes comprehensive objectives for achieving sustainable food systems, including ambitious targets for the provision of organic food in public canteens, reducing plastics, a more robust legislation on animal welfare and regulation of the minimum prices and limiting mass-discount promotions in supermarkets, to avoid large distributors of foods setting prices that penalize producers.

Although many actions are currently carried out in order to lead us forward to a healthier and more sustainable eating, making a step forward is needed:

* There are many actions that are in our hands as reducing food waste, adopting healthier diets or supporting businesses with sustainable practices.
* There is robust evidence to integrate sustainability in national food based dietary guidelines. This could nudge governments to play a more active role to implement sustainable and greener public procurement, which have a strong power.
* Policymakers and government should be bold when introducing integrate sectoral policies that affect food production, processing, distribution, and consumption. They should regulate food systems not only to halt its impact on the environment but also to prevent obesity and other NCDs.
* Investing in Agri Technology is necessary to address climate changes and make farming viable for the next generations.

Consumer have the power to change food systems and dietitians are key agents to help and lead them towards a healthier diet and a more sustainable eating pattern by raising food literacy among population.

Ideal sustainable food system:

* Important aspects are the reduction in non-communicable diseases and financial burden of health care, protection of the environment, animal welfare and food security of the people, which will revert on the economy, equity and protection of culture, including food culture, especially of the minority and most vulnerable groups . The food sovereignty of the people is assured.
* In the environment, the use of renewable energies and the protection and recovery of the quality and safety of soil, water and air should guide actions in all policies, including infrastructure
* In health, it is important to focus on a diet based on fresh and no/ minimally processed vegetable foods, where foods of animal origin are incorporated considering their well-being. The reduction of food waste is a key pillar to ensure food security and food sovereignty.
* Equity is important in society to ensure the well-being through access to fair, environmentally friendly and healthy food systems. It should highlight the democratic participation of people in the social, economic and political system. Consumers have the ability and capability to change the food systems and they should be empowered to do it.
* The necessary infrastructure must be ensured for the welfare of people and access to healthy foods and health services, regardless of their economic and educational level. Infrastructures should facilitate global trade, but it is very important that the food systems have a local / regional approach, as this will be more aligned with the reduction of greenhouse gas emissions, the protection of local / regional economies and the maintenance of the food culture.
* The cultures and traditions of the peoples of the world in all their religious, food, gastronomy, etc., diversity, must be respected, even in a globalized world.
* Regarding health, the level of food processing should be considered as a key point directly related to the nutritional quality of food as well as equity in the economy and protection of the environment.

We do not believe that the focus of a sustainable food system should be the production of organic foods, since much more can be achieved by changing the food habits of consumers towards more moderate diets and based mainly on fresh and no/minimally processed vegetables foods, reducing consumption of meats and animal foods and reducing waste food. While it is true that food production systems must seek a balance between productive capacity and protection of the environment (water quality, soil, air and maintenance of biodiversity)

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

The key is the commitment of governments to adopt these guidelines gradually, but as quickly as possible, but we also believe that it is more important  that civil society is empowered to motivate changes so organizations and stakeholders embrace these guidelines in their strategic plans and take measures to mobilize governments to achieve them.

Civil society has the capacity to change systems, but public policies (governments, public sector) are responsible for facilitating the implementation of sustainable and healthy food systems. We must aspire to a society in which citizens have sufficient health and food literacy and are exposed to environments where it is easier to follow healthy behaviours that enable them to reach the highest levels of health, regardless of their educational and economic level.

All the links in the food chain must work collaboratively and fairly, and the primary sector must be strengthened, be specially protected and its actors suitably trained to facilitate an adequate impact on small economies, social justice, the environment, biodiversity and culture of the people.

Thus, support to families, retailers and small and medium-sized companies, will facilitate fairer systems, which is fundamental to a more sustainable food system. Regulation must be a tool in the promotion of sustainable systems, but primary sector needs investments, public policies and training in advance, which would allow them to make a fair profit from their work.

Undoubtedly, it is a matter of food literacy, but there is no point in having the capability and willingness to act in a sustainable way, whether on the part of consumers, farmers, fishermen, etc.,  if the social, political and economic environment, does not facilitate easy to access to the tools to put into practice what we know is better for a more sustainable food system: affordable fresh and no/minimally processed food, evaluative labelling, healthier portion sizes, pricing policy for non-sustainable or unhealthy foods, affordable environmentally friendly supplies, promotion of non-harmful natural resources and techniques in agriculture, livestock, fishing, food industry, etc.

## Raghavendra Guru Srinivasan, Independent, India

Non communicable diseases is a major global health risk. We need to recognize the fact that a family member cooks food for the well-being of the family while a business cooks food for the profit motive. This change in role of food preparation has huge implication on the health of the family and the society. In the process of food preparation the businesses resort to food design/formulation to tickle food consumption in humans. In the long run inducing food consumption through ajinomoto, saccharine, thickeners, flavor enhancers, glazing agents, coloring agents, quantity discounts, price offers etc result in overeating that causes obesity and other non communicable diseases. Children & young adolescent have very little ability to distinguish between the food consumption for hunger and the onsumption for the sake of consumption experience. An attachment to consumption experience is called addiction. Considering the wellbeing of the Children & young people, the relationship between food business and children should be well regulated to prevent food related health harm.

Attachment:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Yoga%20%26%20Taxation%20%281%29.pdf>

## Dame Sow, association des jeunes de Gadaye commune pour la lutte contre les enfants de la rue, Senegal

From this situation, there is a strong North-South inequality. Indeed, the North has better assets and adequate means to meet the needs of its people while the South is the part of the world that has the most difficulty in meeting its most basic needs. The problems faced by these populations are due to poor nutrition, resulting in malnutrition.  
Malnutrition is broken down partly by undernutrition, which causes the death of 25,000 people per day, and partly by over-nutrition, which is not a lack but a surplus of food and / or poor quality that leads to for example, obesity. We must act permanently to deal with this scourge and for that I think it would be essential to:  
1. Unlock and allocate pledges and focus investments on the most vulnerable countries.

2. Promptly implement measures to assist children and families at risk of malnutrition: cash transfers, food supplement distributions and promotion of breastfeeding.

3. Provide support to small producers and marginalized people over the long term to help them cope with shocks and improve their productivity and access to markets.

4. Invest in agricultural programs designed to combat malnutrition.

## Shawna Morris, National Milk Producers Federation, U.S. Dairy Export Council, United States of America

With thanks to CFS for seeking input on the Zero Draft, please find comments attached for your consideration.  We look forward to continued dialogue.

**Response to consultation on the development of the**

**Committee on Food Security Voluntary Guidelines on Food Systems and Nutrition**

Submitted August 30, 2019

The National Milk Producers Federation (NMPF) and the U.S. Dairy Export Council (USDEC) thank the Committee on Food Security (CFS) for the opportunity to provide written comments on the zero draft of the Voluntary Guidelines on Food Systems and Nutrition (“the Guidelines”).

Milk and dairy foods are well-known for being naturally nutrient rich, providing an abundant supply of high-quality protein, calcium, phosphorus, potassium, iodine, and vitamins B2 and B12. This unique package of essential nutrients contributes to address all forms of malnutrition; it is associated with improved growth, micronutrient status, cognitive performance, and motor function development.[[87]](#footnote-87)

Increased dairy product consumption in energy restricted weight loss diets has been shown in randomized, controlled trials to help address obesity and optimize body composition (lean mass, reduced abdominal fat).[[88]](#footnote-88) Furthermore, consumption of dairy products provides numerous health benefits related risk for some non-communicable diseases. For example, there is an inverse association between milk intake[[89]](#footnote-89) and colorectal cancer,[[90]](#footnote-90) as well as between total dairy intake and risk of type 2 diabetes5 and stroke.[[91]](#footnote-91)

In countries that lack domestic milk production, suitable infrastructure, and where incomes are low, the benefits of dairy nutrients can be delivered as ingredients, usually in the form of powders (whey, milk) for the purpose of enriching plant-based diets that do not meet the population’s nutrition needs. This is particularly true for pregnant and lactating women and the elderly.

For example, a systematic review and meta-analysis published in 2019, which considered 62 trials comprised of 30,000 participants across five continents, concluded that maternal supplementation increased birth weight and that “supplementation of protein from animal-sourced foods generally increased weight and height for length in children.”[[92]](#footnote-92) Ample literature also documents the benefits of dairy ingredients for the management of stunting (during the first 1,000 days of life) and for aging populations, to manage conditions such as frailty, sarcopenia, high blood pressure, diabetes as well as dementia.[[93]](#footnote-93)

Dairy is undeniably part of healthy diets and is a major contributor to helping countries achieve many of the UN Sustainable Development Goals (SDGs). Dairy products and dairy production contribute to achieving zero hunger and improving health and well-being, provide reliable livelihoods, help lift people out of poverty, empower women, care for natural resources, and much more.

NMPF and USDEC submit the following general concerns and specific comments on the zero draft and respectfully request CFS ensure that further revisions reflect the role of dairy products in healthy and sustainable food systems.

**General concerns**

As a general comment, throughout the Guidelines, CFS should:

* Ensure definitions of “healthy diets” remain focused on encouraging consumers to adopt and maintain balanced diets and do not directly or indirectly exclude or limit consumption of nutrient-dense whole foods, such as dairy products;
* Allow for the definition of “healthy diets” to reflect countries’ own national dietary guidelines;
* Ensure all guidelines are science-based and consistent with WTO, Codex, and other international obligations;
* Ensure nutrient-dense foods, such as dairy, are recognized as a critical source of key nutrients, especially for populations at high risk of nutrient insecurity such as children and pregnant women;
* Ensure the voluntary guidelines recognize the positive role of international trade in increasing access to and availability of a variety of foods, including dairy products;
* Guard against overt or disguised protectionism that decreases access to and availability of a variety of foods, including dairy products;
* Ensure environmental sustainability considerations are science-based and reflect the relative and absolute nutritional benefits of dairy foods;
* Carefully consider whether the voluntary guidelines will duplicate work or overlap with the mandates of other international organizations;
* Acknowledge that due to regional and population differences there is no single, universal healthy and sustainable diet;
* Provide for review and revision to ensure progress towards reducing malnutrition;

**Specific comments**

Here we structure our response according to the questions in the online consultation template.

**Question 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?**

Chapter 1 provides a detailed but not exhaustive summary of the current situation related to malnutrition. Given the highly variable nature of nutrition needs and food systems, the voluntary guidelines should specify that CFS is not attempting to apply a universal lens nor recommend onesize-fits-all solutions.

The global dairy industry agrees countries should place particular emphasis on the nutrition needs of children and adolescents, pregnant and lactating women, and the elderly. We note, and request CFS acknowledge, that dairy products are uniquely suited to providing critical nutrients for these populations.

CFS should carefully consider whether the voluntary guidelines as currently drafted will duplicate work or overlap with the mandates of other international organizations.

Paragraph 15 mentions some organizations with relevant work streams and commitments but excludes others (e.g., the Codex Alimentarius). The CFS should ensure the voluntary guidelines are consistent with all international standards and obligations, and CFS member states should ensure that any implementing actions are also consistent with their own obligations.

**Question 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?**

Paragraph 32 introduces a definition of healthy diets, but footnote 17 acknowledges “there is no internationally agreed definition…” Given the critical importance of the question of definition, we urge CFS to note in the main body of the text that there is no internationally-agreed definition of

“healthy diets.” Indeed, the World Health Organization in its fact sheet on healthy diets, concludes “The exact make-up of a diversified, balanced and healthy diet will vary depending on individual characteristics (e.g. age, gender, lifestyle and degree of physical activity), cultural context, locally available foods and dietary customs.”[[94]](#footnote-94)

The sub-points in paragraph 32 are therefore also subject to clarification. The CFS should ensure that no definition or interpretation of a healthy diet as applied in the voluntary guidelines would exclude or restrict consumption of dairy products. Dairy products are a critical source of essential nutrients of public health concern.[[95]](#footnote-95) FAO’s own guidelines recommend at least one serving of milk daily, with some countries recommending up to three servings per day.[[96]](#footnote-96) Dairy is a source of critical nutrients of public health concern, and there is no scientific justification to minimise the role of dairy products in a healthy diet.

Paragraph 36 introduces very broad guiding principles, with a footnote explaining these guiding principles are drawn from existing internationally-agreed tools and declarations. The origins of the principles, however, are not detailed. CFS should specify the existing internationally-agreed documents that support any final guiding principles and should ensure that all guiding principles are consistent with all relevant standards and international obligations.

As an example, it is not clear what existing internationally-agreed documents support guiding principle (c) - “Healthy people, healthy planet.” To the extent CFS is to further develop guiding principles and/or policy recommendations related to environmental sustainability and nutrition, CFS should ensure the voluntary guidelines are based on scientific evidence, including evidence relating to environmentally efficient production practices for nutrient-dense foods like dairy that are critical sources of nutrients of public health concern.

**Question 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?**

Understanding that the text in Chapter 3 does not represent draft text for the voluntary guidelines but rather explanatory text for consideration, we offer the following observations.

Paragraph 40 repeats CFS’ commitment to ensure that the voluntary guidelines “consider, and avoid duplication with, the work and mandate of other relevant international bodies.” However, many of the policy areas detailed in paragraph 41 have clear links to the work and mandate of other international bodies. CFS should clarify its role and expertise related to the policy areas. As CFS is not a standard-setting body, it is critical that the voluntary guidelines are consistent with all international standards and obligations, and CFS member states should ensure that any implementing actions are also consistent with their own obligations.

The scope and depth of the policy areas prevent exhaustive comment on each one. Each area is or could be the subject of extensive research, debate, and negotiation on its own.

We offer here a selection of specific comments about selected policy areas, but we note Chapter 3 will require substantial refinement to ensure precise definitions and concepts that remain within CFS’ role and expertise and do not duplicate or undermine the work of other international organizations.

(f) “Linking farm to school” - We suggest revising this policy area to reflect broader considerations about school feeding programs. School feeding programs can ensure children receive foods that provide critical nutrients while creating opportunities for stable and predictable markets, both local and based on efficient, rules-based trade. Policy recommendations in this area should recognize food safety is of paramount importance in school feeding programs, in production, processing, packaging, transportation, storage, and service.

1. “Agricultural research, innovation and development for healthy diets” -

The list of priorities for investment in research and innovation related to nutrient-dense foods and crops should include dairy. Efficient dairy production practices deliver nutrientdense foods while protecting natural resources.

1. “Climate change adaptation and mitigation” - As noted in (h) above, efficient dairy production practices deliver nutrient-dense foods while protecting natural resources. Policy recommendations in this area should be based on evidence of relative and absolute nutrition benefits and environmental impacts. While the policy recommendations are not yet elaborated, CFS should recall key facts when considering the contributions of both plantbased and animal-sourced foods. For example:

* + Vegan diets have been linked to malnutrition even in developed countries, increased risk of bone fractures, developmental delays, and anaemia, among other health challenges.[[97]](#footnote-97)
  + Food waste accounts for 8% of global greenhouse gas emissions, nearly as much as road transport (9%).[[98]](#footnote-98) Fresh produce is 2-3 times more likely to be wasted than meat and dairy.[[99]](#footnote-99)
  + All animal agriculture is responsible for just 5% of direct global greenhouse emissions and has dramatically reduced its carbon footprint through innovations in efficient production.[[100]](#footnote-100) Furthermore, according to the FAO 2010 report titled “Greenhouse Gas Emission from the Dairy Sector: A Life Cycle Assessment.” the overall contribution of global milk production, processing, and transportation is estimated at just 2.7% of total anthropogenic emissions.16 It is not true that animal agriculture produces more greenhouse gases than transportation, a frequently-cited but mistaken claim, which FAO has corrected publicly.[[101]](#footnote-101)

1. “Antimicrobial resistance” - AMR is the subject of extensive ongoing work in other international fora and standard-setting bodies. We recommend it be removed from the Guidelines, as it is not clear how CFS’ mandate or expertise would result in policy recommendations in this area that do not undermine or duplicate other work.

Paragraph 44 raises food waste and food safety as “policy relevant areas” for “handling, storage, and distribution,” though food waste and food safety are clearly critical throughout the entire food system. Regarding food waste, we suggest CFS acknowledge food waste is a significant contributor to global greenhouse gas emissions. Fresh fruits and vegetables are at the highest risk of being wasted, with 40-50% of root crops, fruits and vegetables lost or wasted, compared to 20% of oil seeds, meat, and dairy.[[102]](#footnote-102)

Paragraph 45 acknowledges the important role of food processing in increasing access to and availability of safe, nutrient-dense foods. However, it also introduces proposals to limit specific nutrients. Such recommendations could result in direct or indirect reductions in consumption of dairy products and have negative impacts on nutrition. As noted previously, the voluntary guidelines should maintain a consistent approach throughout to balanced diets that avoids singling out specific foods or nutrients.

As one example, proposals to target products that contain sugar could be used to restrict children’s access to flavored milk. Evidence does not support such restrictions. In fact, both flavored and unflavored milk provide protein, calcium, and 14 other essential nutrients.

The American Heart Association has found that flavored milk consumption by children is associated with better-quality diets and has no adverse effect on weight.[[103]](#footnote-103) Children who consume flavored milk are more likely to reach their daily recommended intake of calcium and less likely to consume low-nutrient beverages such as soda and sugary juice drinks.[[104]](#footnote-104)

Removing flavored milk from schools has been shown to result in a 62-63% reduction in milk consumption by kids in K-5th grades, a 50% reduction in milk consumption by adolescents in 6th8th grades, and a 37% reduction in milk consumption in adolescents in 9th-12th grades.[[105]](#footnote-105)

Milk consumption is not associated with increased obesity rates. In the United States, for example, milk consumption has been declining over the past several decades, even as obesity rates have increased.[[106]](#footnote-106)

Paragraph 46 should be revised to more accurately reflect the benefits of increased choice and decreased costs for consumers, for example as a result of removing tariff and non-tariff barriers to trade. This trend provides consumers with a vast array of choices at a lower price point, allowing more people to afford diverse, nutrient-rich diets. Any policy recommendations related to market opportunities for smallholders should emphasize removing barriers to competition but should not directly or indirectly enable protectionism. For example, policies could help:

* Improve smallholders’ capacity to comply with food safety requirements;
* Improve infrastructure and investment to connect farmers to markets;
* Increase transparency, consistency, and fair competitive practices in public procurement;
* Remove tariff and non-tariff barriers that limit intermediate trade and development of value chains.

Paragraphs 47-56 considerably expand CFS’ policy consideration and should be subject to significant review and debate. As noted in previous sections, there are clear areas of overlap with the work and mandate of other international organizations, as well as some areas where CFS would not be expected to have the relevant expertise to make appropriate policy recommendations.

Many of our previous comments should be considered in revising this section, including to ensure the voluntary guidelines are consistent with existing international agreements and standards, promote overall balanced diets, do not single out individual nutrients or foods, and do not directly or indirectly promote protectionism.

The voluntary guidelines should affirm the role of rules-based international trade in improving access to and availability of nutrient-dense foods. For example, in paragraph 50(a), CFS should delete the assertion that international trade undermines nutrition actions.

CFS should revise paragraph 50(b) to ensure consistency with the political declaration of the September 2017 UN High Level Meeting (HLM) on Non-Communicable Diseases. There is no evidence supporting demonizing individual foods, nor evidence that discriminatory taxes on specific products decrease NCDs.

Promotion, marketing, advertising, and labeling are subject to multiple existing national and international recommendations (e.g., WHO Set of Recommendations on Marketing of Foods and Beverages to Children[[107]](#footnote-107)) and standards (e.g., Codex Guidelines on Nutrition Labeling[[108]](#footnote-108)), as well as ongoing standards-development (for example, in the Codex Committee on Food Labeling with regard to supplemental nutrition information on food labels). CFS should not introduce new concepts or policy recommendations that conflict with, undermine, or duplicate existing recommendations, standards, or the work and mandate of other international organizations.

**Question 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 policy-making?**

We urge the CFS to acknowledge that due to regional and population differences affecting the five main categories of food system functionality identified in the High-Level Panel of Experts report on food systems and nutrition, it is not possible to identify a universal “ideal” diet for health and sustainability.

This is one reason it is important for the Guidelines to allow for the definition of “healthy diets” to include countries’ own national dietary guidelines. Trade-offs should be evaluated and policy decided based on population-relevant and country-specific evidence.

**Question 5: How would these Voluntary Guidelines be most useful for different stakeholders, especially at national and regional levels, once endorsed by CFS?**

The general concerns and specific comments above reflect the breadth and depth of issues that must be considered in further revisions of the Guidelines prior to CFS endorsement. Until such revisions are complete, it is not possible to comment on implementation.

**Conclusion**

Thank you again for the opportunity to provide our thoughts on these vitally important matters. We thank CFS for seeking input on the Guidelines, and we look forward to continued dialogue.

Submitted by:

Shawna Morris

Vice President, Trade Policy

NMPF, USDEC

## Christine Campeau, CARE, United States of America

Dear FSN Forum Team,

Thank you very much for this opportunity to provide feedback and input for the development of these important Voluntary Guidelines. Please find attached CARE’s contribution.

Best regards,

Christine Campeau

**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?**

CARE aims to tackle the inherent barriers in food systems that prevent people from overcoming persistent and intergenerational malnutrition and poverty. To overcome these obstacles and ensure that no one is left behind, we systematically analyze and work on food system dynamics to help assess how equity impacts and is impacted by nutrition. CARE places particular emphasis on addressing gender inequality.

Fundamentally, hunger, malnutrition, and poverty are not accidents – they are the result of systemic injustices that lead to social and economic inequalities at local to global levels. Unequal relationships in markets, in policy processes, and households – between the powerful and marginalized; between men and women, boys and girls, and among genders – determine who can access resources and who cannot, determining who is hungry and malnourished. Inequality governs who eats first and who eats last, least, and how well. Gender inequality, in particular, is a strong determinant of women’s nutritional status, influencing the roles of and respective labor distribution among men and women as well as the opportunities and resources available to them.

As we work through the various causes of malnutrition, we cannot ignore the rates of overweight and obesity that continue to grow in all regions, and disproportionately affect women and school-aged children[[109]](#footnote-109). Poor quality diets are increasingly leading to compromised human health and are responsible for the unprecedented rise in nutrition-related noncommunicable diseases. The need to regulate the marketing of unhealthy foods, particularly to children, and the role of ready-to-eat foods in diets should be stressed. The environmental impacts of these industrially processed foods, as well as the considerable waste resulting from industrialized food chains, draw from the earth’s finite natural resource base. Paragraphs #10 and #11 speak of supporting the most vulnerable but it is people living in poverty that are most affected by these trends. Since the food supply is driven by market demand, the essential needs of the poor are not determining how resources are used - which foodstuffs are produced, under what conditions and for which markets.

In many countries – both high and low income – agricultural subsidies are disconnected from negative social and environmental externalities, which are key factors in food systems. Farm subsidies too often support a select set of commodities – staple crops – rather than more diversified food production. Unequal power in policymaking processes and vested political interests perpetuate these inefficient mechanisms that, while intended in many cases to ensure support for farmers, undermine other goals of a food system.

We appreciate that power imbalance within our food systems is a sensitive topic but it cannot be ignored if we are to tackle the underlying problems. Governments need to be empowered to counter inappropriate marketing and sale of unhealthy foods, as well as be supported to redirect agricultural subsidies towards diverse and sustainable food production. Agricultural subsidies in the top 21 food producing countries total nearly 500 billion USD, representing an enormous investment opportunity to retool food systems to better support social, environmental, and health – including nutrition – outcomes.

For nearly 75 years, CARE has been fighting poverty and providing humanitarian relief in times of crisis. And in the last three years, the global community has watched the number of chronically hungry people increase, due largely to conflict and climate change. Both issues could be more explicitly discussed in Chapter 1 to reflect the fundamental barrier and threat they pose to food systems that deliver on nutrition. Acute and protracted conflicts are causes for hunger and starvation. Protracted crises make it more difficult to ensure access to adequate, nutritious food – diverse and healthy diets – among internally displaced people and refugees. Climate change will impact all aspects of food security. The most recent IPCC special report, Climate Change and Land, spells out clearly the threat that climate change poses to food systems and nutrition, including potential decreases in the nutritional value of foods. Other research reveals that climate-induced impacts on food production will negatively affect nutrition and health outcomes, leading to as many as 529,000 additional deaths. Malnutrition will also result from climate change impacts on access to clean water, hygiene and sanitation conditions, and poorer health and caregiving practices often due to displacement. On top of these impacts, more frequent and severe natural disasters will increasingly plunge individuals and communities into emergency situations, test their resilience, and push all people further into poverty, especially women and girls.

An inadequate micronutrient supply, whether because of inadequate access or availability or because of a lack of or misleading information on nutritious foods, leaves a third of the world’s population suffering from acute and long-term negative consequences on their health. We must better understand the interactions of acute and chronic malnutrition (wasting and stunting) as well as how to effectively address these. One question we ask is how do we fix the nutrient supply while preserving the world’s biodiversity and halting climate change, fostering development of nations and the most vulnerable – many of whom are food producers themselves?

Finally, to ensure meaningful improvement in nutrition outcomes at a population level, the multidimensionality of malnutrition could also be highlighted further. Cross-sectoral and holistic approaches are essential for meaningful improvement in nutrition outcomes. The intention to apply and implement a multisectoral approach to nutrition has been declared at the highest levels of nutrition leadership. Despite the recognized importance and desire to work multisectorally, the nutrition field has struggled to translate the current evidence base and the collective will into high quality and sustainable implementation and impact at-scale. Awareness of this need has stimulated interest in applying implementation science to nutrition, and a call for research and evidence that advances understanding of how interventions can work in ‘real-world’ setting should be prioritized.

**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?**

We welcome the inclusion of systemic, holistic approaches; gender equality and women’s empowerment; the twin priorities of healthy people and healthy planet; the inclusion of capacity – both human and institutional as well as knowledge and awareness. We are also pleased to see the grounding of the guidelines in the right to food. However, the principles might be strengthened with the addition of inequality, writ large, in line with SDG10; an explicit reference to resilience, particularly in the face of increasing fragility, protracted crises, and more frequent and severe climate impacts. Further, inclusivity and participatory approaches should underpin the guidelines.

CARE’s *She Feeds the World Framework*[[110]](#footnote-110) and programming is based on an integrated model, involving interventions that incorporate gender, governance and resilience as a common approach, across six areas of change, each backed with evidence of success, and a range of toolkits and documents behind them. CARE’s vision for a just and sustainable food system is based on SuPER principles. SuPER Food Systems are:

* Sustainable: Grounded in healthy ecosystems, stable, accountable and enduring institutions and sustainable financing.
* Productive: Increases smallholder farmer’s production levels and the profit earned through intensification that increases returns on investment, including of labor, by farmers, results in nutritionally balanced diets, and is climate ‘smart’.
* Equitable: Enables equal rights, opportunities, resources and rewards for poor and vulnerable people, with a special focus on the needs and constraints of women, and supporting access to affordable nutritious food by rural and urban consumers. This includes equality within the household, within communities, and across local and global value chains.
* Resilient: Allows individuals, families, communities and systems to be able to withstand shocks and stresses, including climate impacts and other risks.3

She Feeds the World builds on our 70 years of experience, in promoting an integrative approach to food and nutrition security, that not only promotes access to critical inputs like water, land, seeds and finance, and access to markets, but also includes an explicit focus on nutrition, safety nets and social protection in times of crisis, and puts women’s empowerment at the heart of everything we do.

One indicator of success that CARE has witnessed, especially in our work around Shouhardo, is the role of women. The meaningful engagement of women in decision making processes would help because links between food systems and household nutrition and health pass primarily through women. Increasing women’s access to resources and decision-making power is a first step, as well as reducing time and labor constraints.

**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?**

Regarding the entry points that are missing, the following suggestions could be considered by the drafting committee:

As mentioned in Q1, there is not nearly enough attention placed on power dynamics around marketing of unhealthy foods and drinks and consumers’ decision-making processes – and this is not limited to developed country contexts. It is not mentioned in Processing and Packaging section (Para 45) at all, although in many developing country contexts, shiny and colorful packaging of ‘snacks’ and ‘juice’ are perceived as better that traditional snacks.

There is a significant need to supercharge small and medium sized enterprises in developing countries to become more transformative for nutrition - making healthier options available and to help reach low income and rural consumers who purchase more food for their consumption than they grow. The private sector also needs to step up its innovations to deal with overweight and obesity challenge, especially in emerging markets. Engaging with private sector stakeholders to tackle food and nutrition security has become an important SDG delivery strategy. There is a call for actors in the food system and nutrition community to enact policies that harness the power of the private sector while protecting consumers.

Again, in Retail and Markets (Para #46), it is not only interactions in stores and markets that shape food systems that influence consumer behavior. The role of the local media, the availability of packaged products with little nutritional value, perception that new/modern is better, etc. all influence consumer behavior. ‘Policies that consider ways to restrict the marketing of….’ is a weak response. This is mentioned on page 16 but narrows the response to the International Code of Marketing of Breast-milk Substitutes and subsequent resolution, and relevant World Health Organization recommendations. Chapter 3 is presented as two separate sections that do not reflect current thinking in what shapes positive behaviors around all aspects of food and nutrition. This should be a much more holistic systems approach

(household, community, food/water/health systems/policy, etc.) to how consumer behavior is influenced.

For example, Food and Nutrition Education and Information lists SBCC as a policy area limited to ‘messaging.’ In fact, SBC (the C for communication is no longer used as it limits the scope) touches on education and information, social norms, values and tradition, gender dynamics, etc, and Nutrition Education targets schools, mother/child health care/adolescent girls without taking a more holistic approach, and identifying and influencing the other actors in the household, community, schools, markets, health centers, etc.

CARE was pleased to see the role of social protection schemes mentioned under the section on ECONOMIC ACCESS (AFFORDABILITY) but it would also be worth emphasizing financing schemes that empower small holders in Para 46.a. CARE has promoted Village Savings and Loan Associations (VSLAs) for over 25 years to enable women living in poverty to increase their financial skills, gain access to and control over resources, and generate economic opportunities and income. In 2009, CARE set out to scale up VSLAs and has since expanded access to this savings-led, community-based financial solution from an initial one million members in 2008 to 6.7 million across 46 countries today. These members represent 317,335 groups of predominantly rural, poor women collectively saving and investing over $433 million per year.

With regard to production systems, attention should also be paid to inclusive and equitable access to the techniques, resources, inputs, etc., among small-scale food producers as well as women and men.

Finally, with regard to policy coherence, it is vital that governments begin moving toward food systems strategies and policies. Only through a food *systems* policy, crafted through an inclusive, participatory process, can governments begin to grapple with the numerous dynamics and factors, outcomes and actors within food systems. For additional information, see Rawe T, Antonelli M, Chatrchyan A, Clayton T, Fanzo J, Gonsalves J, Matthews A, Nierenberg D, Zurek M. 2019. Transforming food systems under climate change: Local to global policy as a catalyst for change. CCAFS Working Paper no. 271. Wageningen, the Netherlands: CGIAR Research Program on Climate Change, Agriculture and Food Security (CCAFS).

**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 tradeoffs 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?**

The existing knowledge and data irrefutably assert that we must move beyond nutrition-specific only approaches to meaningfully tackle malnutrition. Taking into account the global challenges, like climate change and rapid urbanization, the nutrition community is called to apply a nutrition-centered food systems lens to sustainably impact malnutrition on an individual and population level. The importance of the contribution of sectors, outside the traditional health field, to attend to the underlying determinants of malnutrition is increasingly being recognized. The fact that nutrition programming needs to seek creative ways to improve food systems, food quality, and nutrition behaviors; integrate nutrition into other sectors; and change social norms around eating in addition to continuing to implement and scale up established approaches to improve nutrition is widely understood.

Furthermore, regarding specific examples of policies, interventions, challenges, and trade-offs, a recent CCAFS information paper, Transforming Food Systems under Climate Change: Local to global policy as a catalyst for change, discusses these issues and references policy examples from a variety of countries. The paper also discusses trade-offs, the challenge of inequality, and the importance of inclusive governance and policy-making processes.

EXCERPT from a brief on the paper:

Feeding and nourishing a growing and changing global population in the face of rising numbers of chronically hungry people, slow progress on malnutrition, environmental degradation, systemic inequality, and the dire projections of climate change demands a transformation in global food systems.

* 1. **Three areas of policy change show potential to be catalytic**: Policy change is particularly needed to: 1) reduce emissions and increase resilience, 2) tackle food loss and waste, and 3) shift diets to promote nutrition and sustainability. Regulatory and financial policy and market approaches can enable action at the farm level and promote action across the supply chain. Tackling food loss and waste requires action and policy across the supply chain that addresses the drivers of unsustainable production and consumption. Food systems must respond to climate change and deliver on food and nutrition security. Policies must support diets for both people’s health and planetary health.

1. **Tradeoffs call for a multi-sectoral, food systems approach to policymaking**: Food systems cut across most sectors, demanding mutually reinforcing policies that avoid or minimize duplication or contradiction. A whole-of-government approach enables discussion and negotiation across sectors to inform shared goals and tough choices about priorities.
2. **Inequality in food systems demands transparent, inclusive policies and processes**: Inequality in food systems shapes who is hungry and malnourished and who is vulnerable to climate change. Policy must address inequalities to ensure that those left behind now are not left further behind in a transformation. Policy processes must engage the range of food systems actors, ensuring effective participation by marginalized groups. Leveraging policy to redress inequality requires pushing back on the vested interests who benefit from the asymmetries in food systems.
3. **Tackling gender inequality in food systems is a pre-requisite for transformation**: Gender inequality runs deep in food systems, with men and women playing different roles, experiencing climate impacts differently, and articulating different priorities. Addressing gender inequality in policy requires robust analysis through a gender lens to identify current barriers and manifestations of inequality. Gender-transformative policymaking should facilitate equal and effective participation of women and men, girls and boys.

Among the examples highlighted in the paper are Chile’s labelling and marketing law, France’s food waste law, and dietary guidelines from The Netherlands, among others.

In addition, reflecting the importance of multi-sectoral policy approaches, and as highlighted in the CCAFS paper:

The experience of Peru in reducing child stunting demonstrates the value and potential impact of multi-sectoral, multi-level policy planning and implementation. After nearly a decade of little to no progress, between 2005 and 2010, child stunting in Peru dropped by five percentage points overall and ten percentage points in rural areas. An IDS paper argues that the critical factors in Peru’s success under its coordinated National Strategy for Combating Poverty and Chronic Child Malnutrition, CRECER, included 1) the high-level leadership of the Office of the Prime Minister, 2) the horizonal coordination across numerous ministries and alignment of social programs with the national nutrition strategy, 3) the vertical integration of national, regional, and municipal government efforts, and 4) donor support and civil society advocacy for the first three.

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

Building on the efforts of other CFS Voluntary Guidelines, the Voluntary Guidelines for Food Systems and Nutrition should serve the achievement of food and nutrition security for all and support the progressive realization of the right to adequate food in the context of national food security.

The VGs on Food Systems and Nutrition should provide concrete guidance on how to ‘activate’ the recommendations available in the #12 HLPE Report. The roles and responsibilities of the actors within the food system should be made explicit at national level so that everyone understands their contribution and what to expect from others.

Trainings on the role of food systems to deliver healthy diets should be made available, as should national monitoring and evaluation of its implementation so that course correction can be made as the results become available. These lessons should be fed back into the CFS process so that all stakeholders are able to learn from each other’s context specific challenges and achievements.

Food systems – from producer to consumer – are created by a multitude of decisions from individuals, companies and governments about what and how to produce, process, market and consume; all of which have a positive or negative impact on the environment. Guidance on how to make investments with longterm beneficial nutrition and health outcomes is key.

Civil society actors are best placed to assist. Harnessing the power of advocacy, CARE has elevated the role of advocacy as a core program strategy and is intentionally strengthening its advocacy efforts at local, national and global levels, to better understand and address structural causes of poverty, discrimination and hunger. Working alongside other civil society actors and social movements, we can raise awareness about the importance of healthy diets at a national level and shed light on those actions are contrary to the globally agreed nutrition targets and goals.

## Greg Miller, National Dairy Council, United States of America

The National Dairy Council (NDC) appreciates the opportunity to submit responses regarding the Committee on World Food Security (CFS) zero draft of Policy Process on the Development of the Voluntary Guidelines on Food Systems and Nutrition.

NDC, a non-profit organization founded by United States dairy farmers, is committed to research and education about dairy’s role in healthy dietary patterns and sustainable food systems. Established in 1915, NDC comprises a staff of registered dietitians, nutrition scientists, food safety researchers, environmental scientists, and communications experts across the US. NDC provides science-based dairy nutrition, food safety, and environmental research information in collaboration with a variety of stakeholders committed to fostering a healthier nation, including healthy professionals, educators, school nutrition directors, academia, and industry.

The attached responses are offered regarding the zero draft and highlight three main topics of importance within food systems and nutrition:

1. Dietary patterns containing nutrient-dense foods, from a variety of animal and plant sources, contribute value for health and sustainability
2. Dietary and nutrient needs of populations will vary by region, culture, health priorities, preferences, etc., thus will not be met through a single dietary solution
3. Science-based solutions and the involvement of multiple stakeholders are essential components for informing the policy-making process

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3. Science-based solutions and the involvement of multiple stakeholders are essential components for informing the policy-making process

**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?**

Chapter 1 identifies causes and impacts of the triple burden of malnutrition around the globe. The High Level Panel of Experts (HLPE) recognized that global food systems are complex and offered solutions to improve the food system to support delivery of healthy diets. As outlined in the Zero Draft paragraph 5, “malnutrition in all its forms has many interrelated basic, immediate and underlying causes that need to be addressed simultaneously”. These include causes related to differing levels of country infrastructure, the need for health and nutrition capacity building efforts, and responses in the social, economic, and environmental dimensions of sustainable development. The challenges for global food systems are broad and inter-related, and touch on poverty, health and well-being, climate change, trade, the world economy etc.

Due to the complexity of the global food system, and the scope of the issues, caution may be warranted if proposed solutions do not address this complexity. Looking at animal source foods, for example, there have been calls to reduce consumption and production as a step to address both health and the environment (1). These recommendations do not recognize the multiple contributions that dairy makes to nutrition and health, ecosystems services, and producer livelihoods. Milk and dairy products are a vital source of nutrients, provide critical nutrition for vulnerable and growing populations, and consumption is associated with reduced risk for chronic diseases such as cardiovascular disease (CVD) and type 2 diabetes (T2D) (2). The 2018 FAO report on ‘Dairy Development’s Impact on Poverty Reduction’ describes how dairy production also creates livelihood and infrastructure development opportunities, plays a role in poverty reduction through employment and income, and helps improve nutritional outcomes for not only individuals but their families and potentially larger communities as well (3). In addition, the US dairy community has demonstrated its commitments to continual improvements to reduce the environmental footprint of dairy production around the world (4). Dairy is part of the solution for malnutrition reduction, demonstrating contributions to global food systems, healthy diets, and livelihood development.

**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?**

Building sustainable diets and food systems will be characterized by continuous improvement, and measuring these changes is essential to setting goals, meeting targets, and informing policies. A key consideration moving ahead is to ensure that the guiding principles recognize and address trade-offs and synergies - in current and future food systems - and that processes are implemented to help anticipate and avert unintended consequences of policy actions. In addition, there continues to be lack of agreement about how to assess sustainable diets (5). The lack of an underlying science base, and the lack of agreement about assessment represent critical gaps that hinder progress. An evidence-based, systems approach will be essential to developing viable solutions.

**Guiding principles could consider:**

* **Ensuring definitions of “healthy diets” remain focused on encouraging consumers to adopt and maintain balanced diets and do not directly or indirectly exclude or limit consumption of nutrient dense whole foods such as dairy products.** Dairy foods, such as milk, cheese and yogurt, are foundational foods included in multiple eating patterns in the US. These include the Healthy Eating Patterns in the 2015-2020 Dietary Guidelines for Americans (DGA) (Healthy U.S.-Style, Healthy Vegetarian and Healthy Mediterranean-Style Eating Patterns) and the Dietary Approaches to Stop Hypertension (DASH) eating plan (6-12). Dairy foods help meet nutrient needs and are associated with better bone health, especially in children and adolescents (6). Healthy eating patterns containing low-fat or fat-free dairy foods are also associated with lower risk CVD and T2D (6).
* **Ensuring nutrient dense foods such as dairy are recognized as a valuable source of key nutrients, especially for vulnerable populations at high risk of nutrient insecurity such as children and pregnant women.**  Milk is the leading food source of 9 essential nutrients including protein, calcium, phosphorus, magnesium, potassium, vitamins A, B12, D and riboflavin (B2) for American children ages 2-18 (13). For all Americans 2 years and older, milk is the number one food source of 3 of the 4 under-consumed nutrients of public health concern identified by the 2015-2020 Dietary Guidelines for Americans: calcium, vitamin D and potassium (13,14). Additionally, in their 2011 article looking at the importance of milk and other animal sourced foods in low-income countries, Dror and Allen concluded that in order to improve dietary quality of children in low-income countries and assist in eradicating extreme poverty, research looking at programs and policies supporting increased intake of milk and other animal-source foods is needed (15). In their 2013 paper looking at major food sources of essential nutrients in the diet, Huth and colleagues concluded that even well-intentioned dietary changes to reduce consumption of “nutrients to avoid” such as saturated fat and sugars that are found in foods such as meat and dairy, could unintentionally result in reduced micronutrient intake resulting in lower overall diet quality (16).
* **Ensuring the importance of including accurate, science-based information about environmental impact when addressing sustainability of a food system.** In the recently published Intergovernmental Panel on Climate Change (IPCC) ‘Climate Change and Land’ report, authors describe how livestock production has important potential to advance adaptation and mitigate climate change with improved land, animal, and waste management (17). The authors make the recommendation to policy makers that “for livestock, options include better grazing land management, improved manure management, higher-quality feed, and use of breeds and genetic improvement. Different farming and pastoral systems can achieve reductions in the emissions intensity of livestock products. Depending on the farming and pastoral systems and level of development, reductions in the emissions intensity of livestock products may lead to absolute reductions in GHG emissions” (17). According to the FAO 2010 ‘Greenhouse Gas Emission from the Dairy Sector: A Life Cycle Assessment’ Report, the overall contribution of global milk production, processing, and transportation is estimated at 2.7% of total anthropogenic emissions (18). North American dairy generates the fewest GHGe per kg milk produced compared to other world regions (19), and its efficiency can be a model for improvement elsewhere. For example, in 2007 compared to 1944, the U.S. dairy community was able to produce a gallon of milk using 65 percent less water, 90 percent less land and with 76% less manure – resulting in a 63% smaller carbon footprint (4). In 2013, the US dairy community published a Life Cycle Assessment (LCA) for fluid milk (20). US dairy farmers have also invested in companies developing solutions for better manure and nutrient management, and implemented Farmers Assuring Responsible Management (FARM), a program started in the U.S. to establish and implement best practices for animal care and environmental stewardship. Additionally, US dairy has joined other global dairy stakeholders in developing the Dairy Sustainability Framework, with the vision of continuously improving the dairy sector’s ability to provide safe and nutritious food from healthy cattle while preserving natural resources and ensuring decent livelihoods across the industry (21).

**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?**

As stated in the HLPE report ‘Nutrition and Food Systems’, “the multisectoral nature of malnutrition requires individual, institutional, and system-level collaborative engagement and coordination” (22). This engagement and necessary coordination would benefit from development of clear nutrition goals and shared definitions of food systems (grounded on science-based information), improvement in surveillance and other data-gathering tools, and investment in innovation and technology development. Policy making, supported by clear, science-based technical goals and potential incentive opportunities for livestock production to be easily adopted to increase productivity and improve sustainability, would help to drive real improvement at the local, national, and regional levels. Overall, the three primary entry points of supply chains, food environments, and consumer behavior are well represented in the Zero Draft. However, more focus could be given to the need for diverse stakeholders representing these entry points to be involved in the policy making process. Suggestions are mentioned in the introduction of the 2017 HLPE report, where it suggests “to provide maximum benefit for the global population, policies and programmes must be coordinated across multiple sectors, including for instance agriculture, food industry, trade, environment, energy, health, water and sanitation, education, social protection, gender equity, and women’s empowerment” (22).

**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 policy-making?**

There is not one ideal food system, as the inherent properties of complex adaptive systems result in feedback loops, regional influences, and tradeoffs. A successful food system that can address the triple burden of malnutrition will depend on inputs from various other systems encompassing regional factors, climate change, economy strength, infrastructure development, workforce populations, etc.

**Policies, interventions, initiatives, etc. could consider:**

* **Acknowledging there is no single universal diet that combats malnutrition and ensures sustainable practices due to regional and population differences that affect the HLPE five main categories of food system functionality.** In their 2017 ‘Nutrition and Food Systems” report, the CFS HLPE on Food Security and Nutrition stated that “There is no single, universal and “ideal” diet, and diets are often adapted to local contexts and cultures” (22). Additionally, the IPCC included in their August 2019 ‘Climate Change and Land’ report Summary for Policy makers that plant-based and animal-based foods produced through sustainable systems could help achieve climate change adaptation and mitigation (17). The specific policy recommendation included that “balanced diets, featuring plant-based foods, such as those based on coarse grains, legumes, fruits and vegetables, nuts and seeds, and animal-sourced foods produced in resilient, sustainable and low-GHG emission systems, present major opportunities for adaptation and mitigation while generating significant co-benefits in terms of human health” (17).
* **Ensuring the definition of “healthy diets” reflects country-specific, science-based dietary guidance priorities.** The WHO definition of a ‘healthy diet’ sets a valuable framework, indicating that “the exact make-up of a diversified, balanced and healthy diet will vary depending on individual needs (e.g. age, gender, lifestyle, degree of physical activity), cultural context, locally available foods and dietary customs” (23). Specific recommendations in WHO’s healthy fact sheet, however, include limiting individual nutrients to avoid, including free sugars, fat and sodium/salt, without providing overall guidance for how to achieve a healthy eating pattern.

Depending on public health priorities, as well as the food system dynamics of a region or country, the best solution for healthy, sustainable eating may vary. In general, processes for developing dietary guidelines are evolving to focus on the health impacts of healthy dietary patterns, and the foods they contain, more than consumption of single nutrients like sugar, fat and sodium. Both plant and animal foods represent nutrient-dense food choices available to achieve calorie-balanced dietary patterns associated with health from sustainable food systems.

Dairy foods make important nutrient contributions to dietary patterns, and consumption is associated with reduced risk for key chronic diseases. Dairy foods also make important contributions to nutrient intakes in vulnerable populations, including children’s growth and development in both developed and developing countries. On the other hand, dairy foods also contain saturated fat, consumption of which has been discouraged due to links with serum cholesterol. A growing body of research, however, has shown that saturated fat consumption may not be directly linked to CVD risk (24-27) , and consuming dairy foods, regardless of fat content, is not linked to higher risk for certain chronic diseases including cardiovascular disease, coronary heart disease, type 2 diabetes or hypertension and in some cases, consumption is linked to lower risk  (28). This indicates saturated fat on its own may be a poor metric for identifying healthy foods or diets. A group of prominent nutrition researchers recently published a commentary on WHO’s draft guidance on trans and saturated fatty acids. They concluded that WHO’s recommendations to limit intakes of saturated fat fail to take into account considerable evidence that the health effects of saturated fat vary depending on the specific fatty acid and on the specific food source (29). They also discouraged the continued focus on general advice to reduce total saturated fatty acids, and instead recommended a food-based translation of the recommendations for saturated fat to help avoid unnecessary reductions or exclusions of foods that are key sources of important nutrients, including dairy foods, nuts, etc.

Encouraging the development of country-specific, science-based food-based dietary guidelines that account for food systems dynamics in a specific country or region, may be most effective in helping populations reach public health goals in a sustainable way.

* **Acknowledging that trade-offs will exist within a food system to sustainably achieve a reduction in malnutrition and that countries should make these trade-off decisions based on regional and population relevant science-based information.** Balancing trade-offs within a food system will allow for a more successful and sustainable reduction in malnutrition. In the 2018 FAO and WHO resource ‘Strengthening Nutrition Action’, the authors concluded that “every aspect of a national food system should align to support good nutrition or do no harm to it; any single intervention in isolation is unlikely to have a significant impact. Interventions that consider food systems as a whole are more likely to achieve positive nutritional outcomes” (30). These aspects will likely reflect the four main domains of food systems; social, economic, environmental, and health.
* **Recognizing that a diversity of farmers (i.e. small, large, female) is necessary to sustainably reduce global malnutrition.** In their 2017 paper, Herrero et al. analyzed the relationships between agricultural production and nutrient production and found that both large sized and small sized farms had crucial roles in food and nutrient production (31). Authors observed that larger farms (> 50 ha) found in North America, South America, Australia, and New Zealand produce 75-100% of all cereal, livestock, and fruit in the regions while small farms (≤ 20 ha) in Africa, South Asia, southeast Asia, and China produce 75% of most food commodities in these regions (31). Regionally-sensitive policies are needed to support all sizes of farms to ensure nutritious sustainable food systems. Additionally, agriculture provides improvement in women’s empowerment and drives towards continuous equity, as seen by the 30% of US farmers who are women that care for more than 300 million acres of land (32). Looking worldwide specifically at dairy, dairy cows are directly owned by women in 25% of cattle owning households, implying that over 37 million dairy farms are headed by women world-wide (33). Policies that are gender inclusive would allow for actions and benefits to have equitable reach among different populations.

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

**CFS may consider emphasizing the value of building capacity across all food systems sectors. Actions could include:**

* educating all food systems stakeholders to prioritize capacity around food safety and the reduction of food loss and waste; and
* improving public and private infrastructure for well-functioning and efficient food systems by investing in various infrastructures, such as storage facilities, food processing and packaging, energy availability, transportation, access to telecommunications; and
* providing support to collect more and better data on food intake and food composition to determine food and nutrient intake of populations.

**Additionally, these guidelines may encourage stakeholders to:**

* have set evaluation plans to monitor and measure the impact of implementing the voluntary guidelines to ensure they deliver the intended outcomes rather than unintended consequence; and
* explore partnerships with private industries to leverage strengths and resources to address the triple burden of malnutrition; and
* facilitate the adoption of new technologies and best practices for farmers by providing both economic and extension services support; and
* ensure that agriculture value chain, private sector, government, and academic representatives have a defined and inclusive role to assist in the development of a nation’s specific set of guidelines; and
* ensure all guidelines are science-based and consistent with WTO, Codex, and other international obligations.

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## Sonali Phate, Kamalnayan Jamnalal Bajaj Foundation, India

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?

Now-a-days importance of consumption of wild varieties of vegetables has been lost in the regular diet. In the past few decades the availability of wild fruit has also been lowered down as a result of deforestation. This has been adversely impacting the nutritional status with reduction of no cost food availability. Instead it has been observed that the advertisement of fast food has been tempting the community for consumption thus automatically increasing the demand in the extreme remote rural areas also. The food is ready to cook and cheaper in price. This is also impacting adversely on health status. There is need to promote the locally available foods and their recipes. The studies describing the nutritional status of wild fruits and vegetables are already available.

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?

Support should be raised for cultivation of multiple/mixed crops over one fourth acre of land through supply of seeds and cost of cultivation especially for marginal farming community. This one fourth acre of land should be cultivated with adoption of organic farming practices. There should at least 5 wild fruit varieties of plants growing on the bunds of this one fourth acre of land. The food grown over this one fourth acre of land should be consumed by the family and not for sale. Dairy production should also be streamlined in similar way.

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?

Empowerment of local community should be priority so that community should understand and begin to adopt holistic approach towards improved nutritional status. Beside national schemes such as MGNREGS should be utilized for maintaining community nutritional (kitchen) gardens at open spaces available under Gram Panchayat. The food grown should be supplied to the landless and resource poor families residing in that particular village.

The region has been experiences low rain fall and frequent draught since last 3 years. The schemes for harvesting roof rainwater by each of the household should be designed and implemented. At village level water harvesting programmes should be carried out to conserve the water.

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 policy-making?

Wardha district is one of the 35 districts in Maharashtra state in western India. This district is part of Nagpur division. Wardha is primarily an agriculture oriented district. Cotton farming and soyabean cultivation in kharif is quite common. Recently the district has been in news because of a number of suicides that have been committed by the farmers owing to the agricultural loans they cannot repay with the major reasons being bad crops, droughts and lack of irrigation facilities in the region.

Kamalnayan Jamnalal Bajaj Foundationin Wardha is doing many activities for rural people's betterment. These activities are aimed at protection of natural resources, agriculture, social progress and providing options of livelihood. Integrated approach of all these activities led to reducing poverty and improving access to safe food in the villages.

The main livelihood support i.e. agriculture should be supplemented with agro processing facilities and support for direct outlet for the farmers to sale their produce. Mono cropping has its own drawback of making the agriculture dependent on middle man driven forward linkages and loss of bargaining power by the farmers. Small and marginal farmers are the most affected. Second most important think is small and marginal farmers do not have storage space to hold the farm produce and wait for profitable market price.

Bajaj Foundation has successfully take up the promotion of multi cropping to minimize the risk of total crop failure as well as making the things easy for farmers to sale the excess of produce after household consumption in weekly markets. Every year Grain Festival has been organized to build direct consumer linkage which has led to opening of permanent outlet at district place where farmers began to sale fresh vegetables, fruits and other agricultural produce. This is improving their profit margins and they regain their bargain power. They need not to wait for season end to earn money. They are earning almost every day and thus relieved from financial distress. On the other hand this has been improving access to safe food for the consumers as well as diversified their food basket Besides Bajaj Foundation is also helping the families to establish small scale processing units for the crops cultivated by them. For example, processing of wheat sorghum into Papad, Chilli and tamarind into Chatani, fruits into pickles, etc. Similarly wild vegetables have been processed into dry forms with traditional methods. This is not only the value addition but also generated employment opportunities for the landless poor families of the village. Further Farmers’ Producer Companies has been promoted for building backward and forward linkages for the farming community growing organic food.

Further details are available on the web site : [www.bajajfoundation.org](http://www.bajajfoundation.org)

## Anisah Madden, Australian Food Sovereignty Alliance, Australia

Please find attached the Australian Food Sovereignty Alliance's submission to the e-consultation for the CFS policy process on Food Systems and Nutrition.

As noted in our submission, AFSA is a small-scale regenerative farmer-led organisation participating in the CSM through various workstreams. We also hold the CSM Coordination Committee seat for Australasia.

Attachment:

<http://www.fao.org/fsnforum/sites/default/files/discussions/contributions/Australian_Food_Sovereignty_Alliance_Submission_Zero_Draft_CFS_Voluntary_Guidelines_Food_Systems_Nutrition_Sept_1_2019.docx>

## ****Tshilidzi Madzivhandila,**** FANRPAN, South Africa

FANRPAN has the honor to submit the attached contributions towards the development of the Voluntary Guidelines on Food Systems and Nutrition organized by the Committee on World Food Security (CFS).

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?**

The current situation of malnutrition and its causes are adequately covered. However, the section on drivers of malnutrition in some cases are too broad to be of practical relevance. For example, under biophysical factors, we need to see more being said about the diversity of germplasm, especially with increasing use of monocultures which are known to be the main drivers of simplified. Monotonous and nutritionally deficient diets.

The core causes is still not clearly outlined : poverty and inequalities

* + **Underlying causes of malnutrition: lack of access to food**

Most major food and nutrition crises do not occur because of a lack of food, but rather because people are too poor to obtain enough food. Non-availability of food in markets, difficult access to markets due to lack of transportation, and insufficient financial resources are all factors contributing to the food insecurity of the most vulnerable populations.

* + **Conflicts**

Conflicts have a direct impact on food security, drastically compromising access to food. Often forced to flee as violence escalates, people uprooted by conflict lose access to their farms and businesses, or other means of local food production and markets. Abandoned fields and farms no longer provide food to broader distribution circuits. As a result, food supplies to distributors may be cut off, and the many populations dependent on them may be unable to obtain sufficient food.

* + **Lack of safe drinking water**

Water is synonymous with life. Lack of potable water, poor sanitation, and dangerous hygiene practices increase vulnerability to infectious and water-borne diseases, which are direct causes of acute malnutrition

* + **Climate change**

The effects of climate change are often dramatic, devastating areas which are already vulnerable. Infrastructure is damaged or destroyed; diseases spread quickly; people can no longer grow crops or raise livestock. According to UN studies in over 40 developing countries, the decline in agricultural production caused either directly or indirectly by climate change could dramatically increase the number of people suffering from hunger in the coming years

The issue of consumer knowledge and education, while it was mentioned as a factor, is missing from the drivers of malnutrition. Perhaps this should be tackled as consumer empowerment in the food systems.

**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 guidelines rightly recognize that food systems cut-across a variety of sustainability imperatives, and in 36a it is stated that through food systems nations should ‘seek to simultaneously maximize outcomes across all sustainability dimensions’. It is important to recognize here that there is an important social (and environmental) justice aspect to food system development. Because of the multiple stakeholders and varied priorities for food systems agendas (e.g., animal welfare vs food prices vs smallholding farmer livelihoods vs fresh water), it is often inevitable that food system changes will bring winners and losers. The idea of maximizing benefits can sometimes mask the fact that it is often the most vulnerable or marginalized that lose (in even in situations that might be optimal from a utilitarian point of view). Considering how the benefits and costs of food systems are distributed should be part of food system planning and we would argue that social and environmental justice should be a key principle of sustainable food systems. See Whitfield et al., 2015

Food systems are inherently tied up with processes of climate change. Not only does agriculture represent the single most significant sector in terms of emissions contributions, but changing and variable climates are, and will continue to, significantly impact the viability of food production and supply. These impacts are most significant in the Tropics, where temperature and rainfall distribution changes are expected to be most pronounced and where agriculture is largely rainfed. The GCRF-AFRICAP project, working with food system stakeholders in Tanzania, Malawi, South Arica and Zambia as carried out food system scenarios mapping exercises, in which stakeholders recognized climate change as the single most significant ‘critical uncertainty’ that will shape future food systems in these countries ([www.africap.info](http://www.africap.info)). In considering principles of sustainable food systems, it is important to explicitly acknowledge climate change, and the importance of building resilience to climate change into food systems and reducing emissions contributions (in a socially just way) from food systems.

Ref. Whitfield, S., Benton, T.G., Dallimer, M., Firbank, L.G., Poppy, G.M., Sallu, S.M. and Stringer, L.C., 2015. Sustainability spaces for complex agri-food systems. Food Security, 7(6), pp.1291-1297

For rural communities that derive most of the nutrient requirements from own production, it important that the principles highlight the need for producing and consuming diverse foods as opposed to a policy of promoting monocultures. This belongs to the principle “Healthy people, healthy planet” but may be lost when it comes to details.

There is need to include the following in Chapter 2;

1. **Improve processing, storage and preservation** to retain nutritional value, shelf-life, and food safety, to reduce seasonality of food insecurity and post-harvest losses, and to make healthy foods convenient to prepare
2. **Maintain or improve the natural resource base** (water, soil, air, climate, biodiversity), critical to the livelihoods and resilience of vulnerable farmers and to sustainable food and nutrition security for all. Manage water resources in particular to reduce vector-borne illness and to ensure sustainable, safe household water sources
3. **Knowledge of diets diversification** it is crucial for households to know how to improve their diets and how to make choices on the quality of food needed for improved healthy diets
4. **Sustainable environment for nutritious food production**

**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?**

Under production systems-related policy interventions, important that traditional or orphan crops and livestock be promoted, especially to make them commercially competitive with established but less nutritious commodity value chains such as maize and wheat. This would include several value chain development investments by Governments, including product development and support to viable input markets, e.g. improved seed.

All other suggested policy interventions under production are commendable and on-point.

Processing and packaging – this is a major area of improvement in the guidelines, especially when one considers the role played by large food corporations in producing and selling over-processed food. This needs stronger language and should go beyond non-binding guidelines but help countries formulate strong legislation to back up the policy guidelines.

Nutrition education and interventions within production systems should be included in agricultural extension programmes and be supported by policies. In most developing countries, agricultural extension workers are the most widespread at community-level and should be equipped to not only handle production issues but nutrition as well.

**Other things to consider when looking at** policy entry points should include:

* + Engagement of national or regional policy influencers and policy makers in the development of policies relating to food systems and food security
  + Build an integrated understanding of how climate developments will impact Africa’s food and nutrition security
  + Build the capacity of multi-sectoral actors to respond to nutrition and food security challenges
  + Ensure an agriculture sector that is resilient in the face of the climate change challenge in order to produce sustainable nutritious food

**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 policy-making?**

An ‘ideal food system’ should be one in which there is distributional and procedural justice, i.e. that food systems are governed in a way that is inclusive and gives a meaningful voice to all stakeholders, particularly those who are otherwise marginalized. This should also include representation, and justice, for future generations and the environment. A just process of governance, does not always, in itself lead to just outcomes, so it is important to recognize that an ideal food system is not just governed justly but is also one in which the benefits and costs of food systems are distributed equitably and fairly.

The Food Environment guidelines should consider the fixation of most developing country governments with cereals when discussing food security and procuring food to address gaps in local production. Cereals are not synonymous with food security!

Also need to consider that most African countries are increasingly dependent on informal food markets which are difficult to set standards for and adhere to rules.

Build bridges to promote state and non-state actor collaboration for a joint effort in addressing nutrition food challenges

When these guidelines are upscaled and implemented by various stakeholders’ countries stands to improve malnutrition in all its forms at national and regional levels.

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

Context is key – hence the guidelines should consider the food environments in different settings so that the guidelines resonate with local conditions, e.g. predominance of informal markets in most African countries, both under urban and rural settings; the role of culture and taboos which erode good practices; contrary to popular belief, the over-bearing influence of grandmothers in child-feeding practices, especially in rural (and urban) settings – this is a good example of “abuse” of power by older women in society.

## [Wenche Barth Eide](http://www.fao.org/fsnforum/member/wenche-barth-eide)****,**** Department of Nutrition, University of Oslo, Norway

Wenche Barth Eide and Liv Elin Torheim  
*University of Oslo and Oslo Metropolitan University*

**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?**

The 16 paragraphs under Background and Rationale would gain from being split between those that describe the actual situation and its causes and impacts, and those looking ahead as regards policy. This will make it easier to separate factual descriptions from “what ought to be done”.

Para 1 states that malnutrition is an impediment to achieving global food security, however, whereas food insecurity is a major determinant of malnutrition it is not evident that malnutrition is a major determinant of food insecurity (although the ill-health and disease stemming from malnutrition might reduce the productive capacity). Furthermore, the term “global food insecurity” is not a suitable term in this context.

Para 6: It is important to underline that all forms of malnutrition can exist side by side in the context of poverty. Furthermore, the paragraph mentions explicitly only underlying causes of malnutrition, but could also state some of the basic causes such as inadequate capital and resources (financial, human, physical and social) and how malnutrition reflects the sociocultural, economic and political context of a country.

Para. 13: The text should better read: *“…that will result in Voluntary Guidelines on Food Systems and Nutrition (hereafter named VGFSN) to be presented…*”. We propose subsequently that throughout the document “Voluntary Guidelines” should normally be replaced by VGFSN. Consistently calling them with their full acronym will help remind both veterans and newcomers in the debate that there are other VGs within the full context of CFS’ (and FAO’s) efforts to establish such guidelines in a range of areas, and the direct or indirect connections between them.

Para.15 lacks reference to the UNSCN as specifically referred to in the General Assembly document (resolution) proclaiming the Nutrition Decade…“using coordination mechanisms such as *the Standing Committee on Nutrition,* and multi-stakeholder platforms such as the Committee on World Food Security,…”, see A/RES/72/30 para.5, this particular part of the sentence is left out in the citation. (Reinserting it here may also need some adjustment in para. 13.)

General on “underlying problems”: We miss an explicit and honest reference to conflicts of interest that exist and may continue to do so due to unequal power between final decision-makers and their different agendas. It is important that the VGFSN not end up as a document aiming at harmony at all costs and hiding the under-streams that must be made visible and counteracted. An important reference may be the Report of the WHO Director-General for the 142nd Session of the WHO Executive Board in 2018 (EB142/23) on “Safeguarding against possible conflicts of interest in nutrition programmes”, and its follow-up; see also our remark under Question 4.

Para. 16: It is crucial that the VGFSN make an equal emphasis on the human right to health as the right to adequate food. The raison-d’être for having combined guidelines on food systems and nutrition is that the *manifestations* of malnutrition in all forms are health issues while food systems and food environments provide many of the *determinants* for these. This must also be reflected and balanced in the kind of rights in focus in the guidelines and the interplay between them.

Para 21: Citation from present: “… Different actors dealing with these matters need to refer to, and build upon, each others’ resolutions and declarations, promoting coherence and addressing policy fragmentation, without duplicating efforts moving beyond the mandates.”

The first part of this sentence is extremely important and crucial to the kind of integrated progress aimed at in the Nutrition Decade’s concept note, notwithstanding that coherence is often undermined by conflicts of interest among crucial actors.

The highlighted part however is outright dangerous in that it can counteract the idea of integrated efforts where actors may have to draw on other actors’ concepts, norms and methodologies to adjust or improve/enhance their own. This is different from duplication - which is a waste of resources, but may risk being criticized as moving beyond one’s/the agency’s mandate. The logic and experience match those in the debate and practice of inter-or cross-disciplinarity and is directly counterproductive to progress.

We suggest the highlighted part be replaced as follows: *“… without duplicating, but promoting openness to relevant frameworks and approaches of other actors/agencies where the mandates are overlapping (or interfacing) as regards the subject matter.”* (A case in point is precisely food and (nutritional) health!)

Para 25: An important paragraph to ensure that the VGFSN are truly built on earlier agreed UN documents and frameworks, and help prevent efforts to downgrade these by states that may later have changed views on what they have ratified or endorsed. Textwise we suggest enriching the first sentence as follows: “…and applied consistently with existing obligations under relevant national and international law, *including international human rights law*, and with…” (Experience has shown that many in the food and health areas are unaware that there exists something as international human rights law, which has led to many misconceptions and hampered the practical developments of the human rights to adequate food and to health.)

Para 26: We wonder if there ought to be a reference to international trade organizations here ­or if they fall naturally under a)? (See also our remark under Question 4.)

**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?**

Para 33: Please include “adequate” (food) in Note 19.

We suggest the following insert after the definition of the right to adequate food:

*The right to health* “is an inclusive right extending not only to timely and appropriate health care but also to the underlying determinants of health, such as access to safe and potable water and adequate sanitation, an adequate supply of safe food, nutrition and housing, healthy occupational and environmental conditions, and access to health-related education and information, including on sexual and reproductive health; a further important aspect is the participation of the population in all health-related decision-making at the community, national and international levels.”

NB: Also this to be referenced in a similar way in Note 19 (or eventually in a separate note), referring to the CESCR interpreting, through its General Comment No 14, Article 12 of the ICESCR.

*See our comment on para 16 above*

Para 36 d) It is not only to *respect* women’s rights, especially where they do not have many, hence we suggest the text to read “respecting, protecting and promoting/fulfilling their rights…” (in line with adopted human rights terminology regarding the nature of state obligations for realizing human rights, see also below on Ch.3).

f) We suggest using “Realization of the Right to *Adequate* Food” which is the legally adopted term, interpreted in CESCR General comment no 11 (as mentioned in note 19) and as used in the Voluntary Guidelines on the Right to Adequate Food…”. We also propose including the Right to Health, since the right to adequate nutrition is inherent in both these rights (right to health and right to adequate food) but need both to be realized).

Para 36 – general: We think the list of guiding principles should each be referenced with examples of already agreed international documents and tools (too sweeping as it stands in note 20 and too restricted examples now for the purpose; as *a minimum* add Voluntary Guidelines on the Right to Adequate Food..).

**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?**

Para 40 similar to para 21, states that the recommendations are expected to “(…) consider, and avoid duplication with, the work and mandate of other relevant international bodies.” As mentioned above, it is crucial that the work and mandate of other relevant international bodies are taken into account when developing the VGFSN, in order to foster policy coherence and address policy fragmentation.

In Para 41, it would be useful to back up the reference to “humanitarian contexts” with reference to guidance grounded in international humanitarian law (again, to foster policy coherence).

Furthermore, the Right to Adequate Food and the Right to Health are often presented as important crosscutting dimensions (together with other related international human rights) and should also be presented adequately in the VGFSN. In recent time the use of a human rights terminology has sometimes given rise to confusion and tensions, some of which is based on non-familiarity with the content and implication of applying the international human rights framework. To maintain momentum, a reference to the typology of state obligations that has been officially developed through (among others) the relevant UN convention committees, would demonstrate the specter of levels of potential engagement by the state: through respecting, protecting, and/or where necessary, assisting or fulfilling the respective rights; this can in turn to be translated into agreed goals and targets (drawing on Global Nutrition Targets; ICN2 goals, and goals and targets under relevant SDGs) and combined with *principles of conduct* to guide the level and form of state involvement in the realization of these rights.

Such principles largely parallel or conform with “transparent and accountable governance” which normally also would emphasize people’s (or rights-holders’) participation and empowerment in policy formulation, planning and implementation; hence some easy-to-understand information on this typology for how to understand obligations and duties to act should find a place in the VGFSN.

The scope and content of Ch. 3 is otherwise rich and well organized, and there may also be many good proposals coming for further nuancing. We restrict ourselves to a few points:

Para 41 e): stronger emphasis on locally developed varieties and the need for research on indigenous varieties;

f) “nutritious foods” has never been a good term and can lead to misunderstandings, we suggest using e.g. *nutrient-dense foods* and perhaps *nutritious diets* - although “healthy diets” should remain the priority in most contexts*.* The same applies also to para 45 b) and para 47.

g) with “financial inclusion” – pls. include explicitly microcredits and other forms of social protection.

Para 55: In addition to what is mentioned here, please find a way to include the need for new forms of *dialogues* between actors with different even potentially conflicting interests, there are currently efforts to develop approaches to constructive dialogues that might be used in such cases, for example through techniques for joint exercises in developing systems charts in modelling food systems and food environments as a basis for ideas for action.

On a general note: Besides the already referred VGRtAF, other VGs developed through CFS/FAO such as the VGRGT (Voluntary Guidelines on Responsible Governance of Tenure in Land, Forestry and Fisheries, and others) should be referred to. It is important that the CFS shows the totality of the areas where states (and other stakeholders) can seek guidance within a universe where so many actors and actions interface and which need to be understood as pieces of a whole that must seek coherence. Only in this way can the SDG and Agenda 2030 be successfully reached.

**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 policy-making?**

We propose an explicit focus on the role that the food industry plays in whole food systems and the more localized food environments, as related to dietary habits and nutritional health, not least in childhood. The food industry should be part of the solution to malnutrition in all its forms, but is increasingly seen and documented as being part of the problem.

Elements of the food industry are to a large extent responsible for the commercially induced determinants of both obesity and non-communicable diseases and to undernutrition and micronutrient deficiencies. Foods which are unnecessary (ultra-processed foods high in salt, sugar and fat with a low nutrient content, and sugar-sweetened beverages), and contributing to malnutrition, are very profitable and are heavily promoted by the industry as is also infant feeding formulas. This part of the food industry is usually opposing any law-enforced public regulations that may reduce sales of their products (such as restriction of marketing, increasing taxes etc.).

Since such industries contribute economically to a country with job opportunities andsometimes with funding for social projects, it may be difficult for some countries to put the attention to people’s health highest and introduce regulations. At the same time, the food industry should aim to contribute to meeting the challenges of malnutrition with a positive outcome. Most people are dependent on buying food and thereby depend on the food industry to provide healthy and safe food products. The food industry’s role in this part of the food system must also be described.

A central part of this perspective should be to outline how to deal with the conflicting interests that exist between the concerns for nutritional health among stakeholders in the population, and the food industry’s need to satisfy their shareholders’ concerns with profit. These issues must be discussed and recommendations for how to deal with it should be given in the VGFSN. The most important reference material will be the Report of the WHO Director-General for the 142nd Session of the WHO Executive Board in 2018 (EB142/23) on “Safeguarding against possible conflicts of interest in nutrition programmes”, and its follow-up in an informal technical consultation of Member States in February 2019, which also was presented with country case studies as outlined in “Risk assessment and management tools for safeguarding against potential conflicts of interest in nutrition”: <https://www.who.int/nutrition/events/2019-memberstates-consultation-COI-4Feb/en/>

This issue will benefit from using a human rights-based approach where the established international human rights to adequate food and to the highest attainable health are in focus (International Convention on Economic, Social and Cultural Rights, articles 11 and 12, respectively). This will entail to describe the legally established obligations of Member States to protect their population against harm done by third parties, including business enterprises, and the responsibilities of the industry (in this case food industry) to respect all human rights (including to food and health). These respective obligations and responsibilities are elaborated in the UN Guiding Principles for Business and Human Rights adopted by the Human Rights Council in 2011: <https://www.business-humanrights.org/en/un-guiding-principles>

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

We believe the VGFSN, once endorsed, need to be actively promoted through special publicity directed to all potentially relevant government agencies, civil society organizations, as well as academic sectors and institutions to inspire research and higher education, and in ways that show how integrated approaches are now needed across all types of actors and activities. The promotion must clearly be set in the context of halfway into the UN Decade of Action on Nutrition, and must encompass not least actors engaged in the consequences of climate change on food systems and local food environments, as well as on dietary changes in different population groups affected.

States and civil society actors that wish to draw on the international human rights framework in formulating coherent policies and implementation projects, must especially be made aware of the vast material developed by FAO on monitoring and evaluation of such actions from a human rights perspective, besides the many other tools in the FAO Right to Food Methodological Toolbox from about a decade ago. Also the right to health has recently gained high level attention in WHO; recent milestone publications include *WHO*, *Leading the Realization of the Human Right to Health and Through Health - Report of the High-Level Working Group on the Health and Human Rights of Women, Children and Adolescents* (WHO 2017), and *WHO*, *Advancing the Right to Health: The Vital Role of Law* (WHO 2017).

## ****Angélica María Castillo Moncada,**** Embassy of Colombia in Italy

To the CFS Secretariat

The Embassy of Colombia on behalf of the government of Colombia would kindly send the attach documents which contains the main feedback and comments regarding the five main guiding questions presented on the template.

Best regards,

Angélica María Castillo Moncada

**1. ¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030? ¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?**

La situación actual de la malnutrición referida en el capítulo 1, refleja adecuadamente las causas y efectos de la falta de un sistema alimentario y por ende de la dieta saludable, sin embargo, se hace necesario que esta se sustente con datos y cifras disponibles, tales como el informe sobre el hambre, o el informe de la situación de seguridad alimentaria y nutricional elaborados por la Organización de las Naciones Unidas para la Alimentación y la Agricultura. Adicionalmente, es necesario plantear datos relacionados con ambiente y también con agricultura, pues es uno de los factores (causas y efectos) que tiene relación con la producción de alimentos. Adicionalmente, se requiere caracterizar las particularidades de las dietas actuales que impiden que estas no sean saludables y que se relaciona con el ODS número 12 “Garantizar modalidades de consumo y producción sostenibles” (aunque es mencionado por en el párrafo 16), pues esta impacta todos los procesos inherentes al sistema alimentario desde el uso de los recursos naturales para gozar de la disponibilidad de los alimentos hasta su aprovechamiento biológico.

En cuanto a los temas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables, se encuentra la falta articulación de acciones que promuevan un consumo responsable el cual contribuye a la sostenibilidad de un sistema alimentario y por ende a la garantía de una dieta saludable.

Otro elemento a considerar es que en la directriz 19 es importante considerar al sector educación como un componente esencial para el abordaje de la malnutrición y en la directriz 24 se debe incluir como factor político o como una nueva categoría la participación social, comprendida con el reconocimiento y empoderamiento de los ciudadanos no solo en la rendición de cuentas, sino como gestores de procesos para el desarrollo

**2. ¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?**

De acuerdo con el capítulo 2 los principios orientadores son adecuados para la garantía de un sistema alimentario sostenible, pues se reconocerían desde la articulación de políticas, enfoque de género, y la relación con el derecho a la alimentación. No obstante, el principio de conocimientos y sensibilización sobre nutrición debe incluir la alimentación, pues esta se requiere como primer paso para llegar a la nutrición adecuada. Así mismo, estos principios deben llegar a nivel territorial, pues de esta forma garantizarían la apropiada implementación del sistema en todos los niveles

Dentro de los principios que podrían complementar los establecidos en este capítulo se puede proponer:

* Proximidad de actores
* Sostenibilidad ambiental
* Respeto de la diversidad cultural
* Comercio justo para todos los actores
* Consumo responsable
* Educación alimentaria y nutricional
* Garantía de procesos organizativos y asociativos

**3. Considerando los ámbitos normativos identificados en el capítulo 3 y los factores propicios sugeridos en el párrafo 41 del borrador cero, ¿cuáles son los primeros pasos normativos que deberían analizarse en el capítulo 3, teniendo en cuenta la necesidad de fomentar la coherencia de las políticas y abordar su fragmentación?**

Desde el punto de vista normativo es necesario fortalecer la gobernanza de tal forma que su estructura favorezca el desarrollo de acciones directas y transversales en el funcionamiento del sistema alimentario, contribuyendo a su relacionamiento para que sea dinámico y efectivo.

Es necesario que dentro de la normatividad de cada parte (desde la cadena de suministro de alimentos, entornos alimentarios y comportamiento de los consumidores) debe estar la tenencia de la tierra y el comercio justo0, pues con estos elementos se reconoce el papel de todos los actores que participan en el sistema.

Se deben impulsar procesos que fortalezcan la participación y la cohesión social entorno a proyectos que den respuesta a las necesidades de las comunidades y promuevan su desarrollo; inclusión de gobiernos regionales y autoridades ambientales en territorio para la gestión ambiental, la conservación y el uso sostenible del suelo, además de incrementar la participación de las comunidades mediante la creación y uso de redes que fomenten y preserven el conocimiento ancestral.

**4. ¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?**

A nivel internacional, dentro de las iniciativas que se deben tener en cuenta se encuentra el Pacto de Milán, que es “tratado voluntario que firman las ciudades que se comprometen a trabajar en el desarrollo de sistemas alimentarios sostenibles, inclusivos, resilientes, seguros y diversificados, para asegurar comida sana y accesible a todas las personas; en un marco de acción basado en los derechos, con el fin de reducir los desperdicios de alimentos y preservar la biodiversidad y, al mismo tiempo, mitigar y adaptarse a los efectos del cambio climático”. En Colombia, este pacto fue firmado por Medellín y Bogotá, sin embargo, trasciende a nivel nacional.

A nivel de Colombia una de las normatividades que estarían relacionadas con el objetivo de aportar a la reforma o promoción de los sistemas alimentarios con miras a garantizar que los alimentos que contribuyan a las dietas saludables, es la Resolución 464 de 2017 del Ministerio de Agricultura y Desarrollo Rural, por medio de la cual se adoptan los Lineamientos Estratégicos de Política Pública para la Agricultura Campesina, Familiar y Comunitaria. Así mismo, se encuentra el Plan Nacional de Negocios Verdes (2014), que se construye a fin de brindar los lineamientos para la ejecución de una de las estrategias de la Política De Producción y Consumo Sostenible, enfocada en la comercialización de bienes y servicios sostenibles provenientes de recursos naturales, agro sistemas sostenibles y sistema de producción ecológico, orgánico y biológico. Por otra parte, se cuenta con la Estrategia de Compras locales que busca apoyar el desarrollo y emprendimiento productivo de las familias y de las comunidades locales. Es dirigida principalmente a los pequeños productores agropecuarios que contribuyen a la seguridad alimentaria nutricional, así como al fortalecimiento de las economías locales de Colombia.

Dentro de los desafíos y limitaciones relacionados con los tres elementos integrantes de los sistemas alimentarios descritos en el documento, pueden relacionarse con la falta de articulación entre las políticas nacionales que abarquen desde la producción, distribución y consumo de alimentos, así como de acciones que permitan tener una relación cercana y horizontal de los actores que conformarían el sistema.

En cuanto al sistema alimentario ideal en Colombia se han realizado algunas investigaciones (Colciencias proyecto liderado por Universidad de Antioquia, Universidad Nacional y Universidad Pontificia Bolivariana) sobre sistemas alimentarios garantes de soberanía alimentaria y seguridad alimentaria y nutricional y por ende de dietas saludables, esta propone que los sistemas alimentarios ideales deberán concurrir tanto recursos como acciones del Estado, la sociedad civil, comunidades, actores públicos y privados y esta participación debe estar orientada a la sostenibilidad y equidad **(**<https://sistemasalimentarios.home.blog/ideas-para-construir-un-sistema-alimentario/>**).** En este sentido para la formulación de políticas se debe tener en cuenta:

* Brindar garantías para el desarrollo de acciones en producción de alimentos (vincular tanto pequeños, medianos y grandes productores)
* Posibilitar el tránsito a las prácticas agrícolas sostenibles y saludables
* Disminuir intermediarios
* Brindar orientaciones a la población sobre alimentación y nutrición para lograr una dieta saludable y culturalmente aceptable

**5. ¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?**

Estas directrices podrían ser útiles logrando su articulación con la normatividad referente al tema de Seguridad alimentaria y Nutricional y al derecho humano a la alimentación. Así mismo, se debe realizar más énfasis en la posibilidad de potencializar el cumplimiento de los ODS (1, 2, 3, 4, 5, 6, 8, 10 y 12), a nivel nacional con la implementación de estas directrices. Así mismo, para su implementación, se podría apoyar la investigación de las características (a nivel nacional y regional) de los sistemas alimentarios y como potencializar sus objetivos en búsqueda de una dieta saludable.

**1. ¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030? ¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?**

La Agenda 2030 contempla temas relativos a la nutrición bajo los siguientes ODS, que son abordados en el capítulo I de las Directrices:

ODS 1. Poner fin a la pobreza en todas sus formas en todo el mundo.

Una de las formas en las que la pobreza se manifiesta es mediante el hambre y la malnutrición.

ODS 2. Poner fin al hambre, lograr la seguridad alimentaria y la mejora de la nutrición y promover la agricultura sostenible

Meta 2.2. De aquí a 2030, poner fin a todas las formas de malnutrición, incluso logrando, a más tardar en 2025, las metas convenidas internacionalmente sobre el retraso del crecimiento y la emaciación de los niños menores de 5 años, y abordar las necesidades de nutrición de las adolescentes, las mujeres embarazadas y lactantes y las personas de edad.

ODS 6. Garantizar la disponibilidad de agua y su gestión sostenible y el saneamiento para todos.

-La escasez de recursos hídricos, la mala calidad del agua y el saneamiento inadecuado influyen negativamente en la seguridad alimentaria, las opciones de medios de subsistencia y las oportunidades de educación para las familias pobres en todo el mundo. La sequía afecta a algunos de los países más pobres del mundo, recrudece el hambre y la desnutrición.

En relación con problemas relativos a las dietas saludables que inciden en la efectividad de los sistemas alimentarios se ha evidenciado que la población colombiana presenta prácticas alimentarias inadecuadas, tales como deficiente ingesta de frutas y verduras, solamente el 50,5% de la población consume frutas diariamente y el 16,1% consume verduras crudas diariamente; también se identificó la ingesta de alimentos de muy bajo valor nutricional, por ejemplo el 94,6% de los colombianos consume azúcar, panela o miel diariamente; el 81,2% consume bebidas gaseosas y/o refrescos; de estos el, 22,1% lo hace diariamente; el 69,6% de la población del país consume alimentos de paquete; el 36,6% consume diariamente golosinas y dulces (Encuesta de Situación Nutricional de Colombia (ENSIN 2015).

**2. ¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?**

En relación con los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable incluidos en el capítulo 2, el Estado colombiano ha avanzado en estrategias promocionales que buscan controlar factores de riesgo y fomentar el consumo de alimentos saludables, al respecto, se pueden identificar:

* Estrategia promocional del consumo de frutas y verduras.
* Estrategia nacional de reducción del consumo de sodio.
* Plan para la disminución del consumo de grasas: directriz para el buen uso y disposición de aceites y grasas.
* Lineamientos para promover la alimentación sana: para la adquisición y preparación de alimentos saludables en los programas de ayuda alimentaria (incluye escuelas, programas en primera infancia) –para la preparación de alimentos en el sector gastronómico.
* Promoción de la lactancia materna a través del Plan Decenal de Lactancia Materna (2010-2020).
* Implementación de Guías Alimentarias Basadas en Alimentos

Los principios rectores que se mencionan en las directrices hacen referencia a documentos e instrumentos internacionales que ya han sido acordados, como por ejemplo la Declaración de Roma sobre la Nutrición y el Marco de Acción de la Segunda Conferencia Internacional sobre Nutrición (CIN2).

**4. ¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?**

Frente a la posible caracterización del Sistema Alimentario ideal se resalta que aquel debería: 1) integrar las dimensiones económicas, sociales y ambientales; 2) incluir objetivos de nutrición, inclusividad y género; 3) proporcionar dietas más nutritivas; 4) involucrar a todos los actores, elementos y actividades para hacer posible la producción, transformación, distribución y consumo de alimentos; y 5) ser sostenible (Reflexiones sobre el sistema alimentario en América Latina y el Caribe y perspectivas para alcanzar su sostenibilidad. FAO, 2017).

**5. ¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?**

Algunas alternativas para que las directrices voluntarias sean útiles a nivel nacional involucran el establecimiento de mecanismos de medición de resultados; exámenes periódicos sobre los avances a nivel nacional y regional; retroalimentación sobre buenas prácticas implementadas, así como de elementos a mejorar. Es importante resaltar que las directrices deben impulsar a los gobiernos a formular políticas públicas que promuevan acciones intersectoriales para avanzar en materia de sistemas alimentarios y nutrición.

## ****Meryl Williams, Gender in Aquaculture and Fisheries Section of the Asian Fisheries Society, Australia****

Dear FSN-Moderator

We are pleased to take the opportunity to submit feedback and ideas on the zero draft of the Voluntary Guidelines on Food Systems and Nutrition.

Our submissions emphasises the importance of engaging women in all relevant topics of the VG, the role of fish and other points on education and multi-sectoral actions.

We trust this will be useful in revising the zero draft.

Sincerely

Meryl Williams and Kafayat Fakoya

SUBMISSION FROM MEMBERS OF THE GENDER IN AQUACULTURE AND FISHERIES SECTION OF THE ASIAN FISHERIES SOCIETY (http://www.genderaquafish.org/)

**Note**: The following submission represents the views of Kafayat Fakoya (Nigeria) and Meryl Williams (Malaysia, Australia), senior office bearers of the GAFS.

**Preamble**: Our submission contains suggestions that are general and other that are specific to fisheries and women/gender in making food systems work for human nutrition. We would be happy to supply supporting references if requested. In summary, we suggest that the Guidelines:

• Define what is a food system

• Recognize the often poorly developed and hybrid (modern/traditional) nature of food systems in developing countries.

• Recognize the scale of and increasing reliance on the industrial (highly processed) food value chains that are also strongly penetrating developing country food systems and impact nutrition in complex ways.

• Women and gender equality elements should be included in most topics in the Guidelines, as well as in the cross-cutting issues.

• The multi-sectoral approach to nutrition will need to deal directly with the contradictions among the sectors in policy priorities, such as fish export and large scale farming/fishing over domestic nutritional outcomes from the food produced.

**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?**

a. **Yes, Chapter 1 reflects the current situation of malnutrition and its related causes and impacts**, particularly in line with the goals and targets of the 2030 Agenda. The underlying problems that hinder food systems in delivering healthy diets are multi-faceted and interwoven. However, these have been mentioned as drivers and have consequences leading to social inequalities - particularly gender inequalities - intersecting with vertical inequalities (income) and horizontal (class/ status) inequalities.

b. **Nutritional education and awareness** are equally important to inform people of the impact of micronutrient deficiencies, undernutrition (wasting and stunting) and obesity and how these can be avoided. Also of significance is the knowledge of secured access to safe drinking water, adequate health services, knowledge and understanding of proper care for oneself, for food preparation, storage and safety play as these play complementary roles in delivering healthy diets.

c. In most **food systems of developing countries, value chains are poorly developed** and this affects availability, affordability, sustainability and accessibility of food. Food systems lack coordinated integration (both horizontal and vertical) and linkages with other sectors such as health, education, transport etc to optimize resources whether human, logistics, financial or physical for better nutritional outcomes and for coherent policies. Moreover, food systems of developing countries are often hybrids of modern and more traditional food systems, with the modern penetrating deeply into geographies that have previously been based on the traditional. The arrival and ingress of the modern food systems often greatly disrupt or transform overall food systems, with consequences for many people and for their nutrition.

d. Chapter 1 could benefit from **defining what is meant by “food systems**.” This seems to be assumed but not explained. Is this document directed at both public and private sector agencies and individuals that make up the food systems? We note that even in developing countries, the food systems are becoming dominated by multi-national companies and their national subsidiaries or franchises, bringing new foods, often industrially produced, into pre-existing food systems and often, in a short time, coming to define diets that, while desired, may not be the healthiest. How will these large actors in food systems be targeted by the Guidelines?

**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?**

In addition to the principles outlined in Chapter 2, more emphasis should be on:

a. Use of **best available knowledge** including local (indigenous and traditional) and **women’s knowledge** on production systems, handling, preservation , processing and storage; marketing systems both formal and informal, cultural preferences in consumption to understand the scopes, drivers, dynamics and project future trends.

b. There must be **wider stakeholders’ consultation** in design of food policies, planning and implementation, but with care that producer or corporate self-interest does not capture the process and its outcomes. **Women and women’s groups must be included in the consultations** in all matters, not just those directly concerning women (see the next point). Different types of food should be included: grains, legumes, roots and tubers, fruit and vegetables and other crop products, fish, white and red meat and dairy, beverages, oil seeds and other oils.

c. **Gender equality and women’s empowerment** should be incorporated into promotion of social equality and social protection for the vulnerable – young children (< 5 years), pregnant and lactating women, the old, economically, socially and politically marginalized and the disabled.

d. **Nutrition education** as part of compulsory curriculum in schools (primary, secondary, tertiary) introduced into extant subjects offered such as Health Sciences, Food and Nutrition, Agricultural Sciences, General Studies etc. Nutrition education should also be **included in development programs outside formal education systems** as studies show this form of nutrition education complementary to, for example, fisheries and aquaculture development work.

**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?**

a. With respect to paragraph 41, we stress that **although gender equality and women’s empowerment are important cross-cutting issues, they are also issues germane to most topics in the Guideline and should be included in these**.

a. Policies to promote consumption of **under-utilized, non-conventional but nutrient–rich protein foods** particularly available at community levels. These policies must be designed to be context or location specific, depending on the type of non-conventional food source available.

b. Policies must prioritize the **protection of nutrient–rich food sources** that are cheap, affordable and available to the vulnerable in their local settings for human consumption.

c. **Participatory multi-stakeholders research** comprising of producers, processors, researchers and government for improved productivity, safety and quality, affordability and reduced losses of food sources either conventional or non- conventional.

**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 policy-making?**

a. **Increase productivity via culture or promote sustainable exploitation of nutrient-rich food sources** that are crucial and used as food for humans and also have alternative uses as animal feed. An example is in West Africa where **nutrient-dense fish - the small pelagics** (clupeids) are harvested currently for **fish oils and fish meal** for use in animal feeds. In other regions, the small pelagics are much sought after for fish and shrimp feed, e.g., Peru and India. Policies that **divert the maximum amount** of such potential food as small pelagics **toward direct human use** and away from use in fish meal and fish oil as feed components in animal husbandry, livestock rearing and fish farming could reduce competition among with humans. Much of the animal and aquatic products grown on fishmeal goes to well nourished people who can afford them, whereas the direct consumption of small pelagics is mainly by poorer people at risk of malnuttition.

c. Policies to solve complex food safety and health problems via participatory risk analysis.

d. Improved **coordination and institutional arrangements** to avoid or limit overlapping statutes and interests among agencies, ministries or departments via **multi–sectoral approaches** in formulating, planning and execution of food or nutritional-sensitive policies, plans and projects

e. **Database on comprehensive nutrition profiling of food** – conventional and nonconventional, raw or processed to accurately interpret the real contributions of micro- and macronutrients based on availability and access for consumption.

f. Policies **to scaling–up cost-effective, feasible and high impact nutrition interventions**.

g. Policies and actions must **address innovations** such as **food fortification projects** and **genetically modified foods** and also **why some innovations are not taken up**.

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

a. At national levels, these Guidelines should be the **reference for policy development, advocacy and monitoring to promote food and nutrition security** via multi-sectoral approach involving public sector and partnerships with the private sector. For example, the Scaling Up Nutrition (SUN). Food and nutrition policies must be seen to be the sole authority of the Health Sector. As the SUN Mid Term Review indicated, however, getting some sectoral agencies such as agriculture (and fisheries) to **align to improved nutritional policies is very difficult when current policies like export orientation (fisheries/aquaculture) and large scale agricultural industry development take the sector in different directions**. We recommend that **global forums such as the FAO Committee on Fisheries debate how to reconcile such contradictions in order to achieve better nutrition outcomes**. These discussions should involve a strong gender analysis as **women are often the most affected by current directions favouring fish, aquaculture and agriculture modernization, without due attention to the gender and nutrition outcomes**.

b. The Guidelines must be **produced and available in simpler versions** as in the case of the Voluntary Guidelines for Small-Scale Fisheries and in **local languages** for wider circulation to target the most vulnerable and across different age groups including all categories of school children. CSOs have a greater role to play here.

c. The guidelines must be similarly **legally endorsed and adopted by National Governments** and for implementation.

d. Series of **National Multi-Stakeholder Workshops** must be organized to launch the guidelines adoption, contextualization with the intention to adapt into local settings and subsequent implementation.

## Nicola Pisano, Freshfel Europe, Belgium

In regards to the below consultation on 'CFS policy process on the development of the Voluntary Guidelines on Food Systems and Nutrition', Freshfel Europe (The European Produce Association) would like to submit a response.

Please find attached Freshfel Europe's response to the consultation.

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,

Nicola Pisano  
Communications Manager & Policy Advisor  
Freshfel Europe  
The forum for the fresh produce industry

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

2 nd 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[[111]](#footnote-111).

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.
* 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,

Nicola Pisano

Freshfel Europe Policy Advisor & Communications Manager

## [Andhressa Fagundes](http://www.fao.org/fsnforum/member/andhressa-fagundes)****,**** Universidade Federal de Sergipe, Brazil

August 30, 2019.

Dear FSN Forum colleagues,

On behalf of the Thematic Group Food and Nutrition in Collective Health (GT- ANSC), from Brazilian Association of Collective Health (ABRASCO), we are pleased to share our opinions and ideas about the Voluntary Guidelines on Food Systems and Nutrition and to submit our feedback.

Congratulations for the initiative.

Sincerely,

GT – ANSC/ ABRASCO

**Voluntary Guidelines on Food Systems and Nutrition CFS policy process on the development**

**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?**

COMMENTS:

The concept of healthy eating currently adopted in the document has already proved insufficient to meet the challenges of ensuring healthy eating for people. Focusing solely on the nutritional composition of diets does not foresee the immense challenges and the dimensions that condition people and societies to achieve this ideal composition. Therefore, it must be expanded to incorporate the aspects that determine and/or impact not only the individual health but also the economic, social and environmental sustainability of the food systems. An example of what we are proposing is the concept adopted in the "Dietary Guidelines for the Brazilian population":

“Adequate and healthy diet is a basic human right. This right implies ensuring permanent and regular access, in a socially fair manner, to food and ways of eating that satisfy the social and biological requirements of everybody. It also takes into account special dietary needs, and the needs to be culturally appropriate, and allow for differences in gender, race, and ethnicity. An adequate and healthy diet should be accessible both physically and financially, and harmonious in quantity and quality, meeting the needs of variety, balance, moderation, and pleasure. Furthermore, it should derive from sustainable practices of production and distribution.” (Brazil, 2014)[[112]](#footnote-112).

It is necessary to clarify the unsustainability of the hegemonic food systems. We highlight here some of its characteristics of this unsustainability:

* They are structured based on non-applicable assumptions (e.g., a stable climate, abundant water, cheap energy);
* They are based on large estates, monoculture, and large-scale production;
* They widely use non-food/natural components (pesticides, antibiotics, hormones, additives) harmful to the health of people and the planet;
* They degrade ecosystems due to their methods of producing, storing, transporting and marketing food;
* They are inefficient at various stages of the production process, generating waste and impacting prices;
* They use technologies that threaten food sovereignty and biodiversity (e.g., genetic modification, biofortification);
* They induce, through various mechanisms, the shift of consumption from fresh and minimally processed foods to processed and ultra-processed foods;
* They threaten food culture and heritage;
* They concentrate stages of the food chain in large transnational corporations (e.g., input and seed industries, food industries, large retail chains) that have high political and economic power and act to block public policies that go against their interests. Moreover, to enable measures that favor their business;
* They reproduce and deepen the social inequities in access to land, water, energy, and income.

In short, hegemonic systems are based on an income-concentrating model that is highly dependent on large transnational corporations, which favors the production of unhealthy food, deepens inequities, and generates critical environmental repercussions. These characteristics impact not only individual and collective health but endanger the democracy and reach of the SDG as a whole, not just the SDG2.

It is also necessary to recognize the relationship between social inequalities and the occurrence of chronic diseases, as well as ~~t~~he decisive influence of hegemonic food systems for the current epidemiological scenario of increasing obesity and other chronic diseases. One publication that can help substantiate this argument is a report entitled "The Global Syndemic of Obesity, Undernutrition, and Climate Change: The Lancet Commission Report" by Boyd Swinburn and colleagues (Lancet, 2019)[[113]](#footnote-113).

Similarly, another report also released by The Lancet brings resembling evidence and proposals indicating the urgency of incorporating a broader view of what is "healthy eating" and the strategies to make it viable and accessible to people.

References:

Swinburn, B. et al. The Global Syndemic of Obesity, Undernutrition, and Climate

Change: The Lancet Commission Report"

https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(18)328228/fulltext?utm\_campaign=tlobesity19&utm\_content=83639620&utm\_medium=social& utm\_source=twitter&hss\_channel=tw-27013292#articleInformation

Willett, W.; Rockström, J.; Loken, B.; Springmann, M.; Lang, T.; Vermeulen, S. et al. Food in the Anthropocene: the EAT-Lancet Commission on healthy diets from sustainable food systems. The Lancet Commission, v. 393, n. 10170, p. 447-492, January 2019. http://dx.doi.org/10.1016/ S0140-6736(18)31788-4.

**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?**

COMMENTS:

Principle (f), "Realization of the human right to adequate food" should be the first to be cited and should be recognized as the structuring axis of all guidelines. In this sense, the guidelines must assume the inseparability of human rights, since rights such as land and territory are essential for the sustainability of food systems.

Principle (d), "gender equality and women's empowerment", should be addressed not only within the limits of women's role in food systems but in the promotion and protection of the rights to gender equality as a whole for the free and full realization of women, and, therefore, to reduce social injustice.

The following should also be included as guidelines principles:

* Equality and non-discrimination;
* The rights of indigenous peoples and traditional communities to land, territory and free exercise of their livelihoods;
* Recognize that regenerative and traditional practices are services provided by indigenous peoples and traditional communities to protect the planet and humanity;
* Protection and promotion of regenerative and sustainable production models; - Protection of the heritage and food culture of different peoples and communities; - Protection and health promotion of all workers involved in all stages of the food system;
* Democratic governance, representative of the right holders, transparent and free of conflicts of interest.

**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?**

COMMENTS:

Considering the sharing of macro determinants of food systems and food and nutrition, we emphasize that for the Voluntary Guidelines to have the potential for effectiveness in addressing the unsustainability of food systems and addressing all forms of malnutrition, public policies need to move forward taking back the regulatory role of Member States (promoting, protecting nutrition and sustainable food systems) so that food is a public good. The inclusion of protection and promotion of sociobiodiversity is also suggested.

**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 4 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?**

COMMENTS:

* Taxation to reduce the consumption of unhealthy products; - Incentives to expand financial access to healthy food (exemption);
* Public policies to expand access to healthy food. Food supply system to promote physical and financial access to healthy foods (short circuits, growers' markets, fairs, protection, and promotion of small businesses). Generating a direct action to induce retail trade with healthy products in regions of lower purchasing power, to reduce deserts and food swamps;
* Regulation of all practices of commercial promotion of unhealthy products mainly aimed at children (advertising, TV, internet, event financing, marketing and merchandising in public equipment in general and in schools in particular)
* Food labeling with front warning;
* Update of health claims regulation rules on food labels;
* Prohibition of marketing and advertising of unhealthy products in government administered facilities in general, and in schools in particular;
* Inclusion in the school curriculum of an approach of the multiple determinants of food and nutrition to promote autonomy, valorization of self-care and development of skills;
* Approach to food and nutrition education beyond the biological dimension to generate autonomy, critical capacity, and skills. Following the concept and principles adopted in Brazil (BRASIL, 2012):

"Food and Nutrition Education, in the context of the realization of the Human Right to Adequate Food and the guarantee of Food and Nutrition Security, is a continuous and permanent, intersectoral and multi-professional field of knowledge and practice that aims to promote the independent and voluntary practice of habits. healthy eating”.

* Food and Nutrition Education should be governed by the principles:
* Social, environmental and economic sustainability;
* A comprehensive approach to the food system;
* Appreciation of the local food culture and respect for the diversity of opinions and perspectives, considering the legitimacy of knowledge of different natures;
* Food and meals and as references;
* Cooking skills as an emancipatory practice;
* Education as a continual process that generates autonomy and active and informed participation of the subjects;
* Diversity in practice scenarios;
* Intersectoriality;
* Planning, evaluation, and monitoring of actions.

Reference:

Brasil. Marco de Referência de Educação Alimentar e Nutricional para as Políticas Públicas, 2012. http://www.cfn.org.br/wp-content/uploads/2017/03/marco\_EAN.pdf

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

**COMMENTS:**

In both central and peripheral countries, contemporary food systems respond to the private logic of capital, which operates globally. As a result, there is a homogenization in dietary patterns, and industry determine what and how populations should eat. Dominated by large transnational corporations, food systems, in their present configuration, are unsustainable in terms of promoting food and nutrition security, either nationally or regionally.

In addition to the environmental impact, which is destructive to large-scale agricultural production based on the intensive use of transgenic seeds and pesticides, there has been a marked change in global food systems in recent decades, with the replacement of meals based on with food and culinary ingredients for ready meals, made up of ultra-processed foods, which significantly affects the health and nutrition of populations. From this perspective, there are no sustainable food systems, since they are not subordinated to human needs, but the needs of capital.

On the other hand, thinking about public policy actions related to food and nutrition, presupposes an understanding that states operate in line with the global logic of the commodity-producing system, in its different phases of accumulation. This will lead to more or less investment in national policies that will reduce social inequalities and different forms of malnutrition and promote the development of sustainable food systems.

Thus, the discussion here does not end with the finding of common sense, according to which it is a matter of the political will of rulers to end social inequalities since they are a constitutive element of the successive crises of capital. Thus, to tackle this issue at its root, it is necessary to broaden the discussion to other global forums that focus on the direction that world economic policies are taking and their societal consequences. Depending on the global pressure, caused by broader movements, it will be possible to envisage public policies that favor state regulation of food systems, towards the construction of sustainable systems capable of producing healthy food. Under these assumptions, it is necessary to consider the correlation of forces that is capable of forcing national states to act more closely to human needs, producing movements of state regulation regarding agricultural and industrial food production.

References:

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MONTEIRO, G.; FARINA, EMMQ; NUNES, R. Food-retail development and the myth of everyday low prices: the case of Brazil. Development Policy Review, London, v. 30, n. Jan 2012, p. 49-66, 2012. Disponível em: < http://onlinelibrary.wiley.com/doi/10.1111/j.1467-7679.2012.00559.x/pdf >.

Pochmann M. Estado e capitalismo no Brasil: a inflexão atual no padrão das políticas públicas do ciclo político da nova república. Educ. Soc., Campinas, v. 38, nº. 139, p.309-330, abr.-jun., 2017.

http://www.scielo.br/pdf/es/v38n139/1678-4626-es-38-139-00309.pdf.

## [Astrid Jakobs de Padua](http://www.fao.org/fsnforum/member/astrid-jakobs-de-padua)****,**** World Bank, United States of America

Dear CFS colleagues,

Please find attached the World Bank’s comments on the Zero Draft for Voluntary Guidelines for Food Systems and Nutrition.

Best regards,

Astrid Jakobs

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?**

**General Comments**

Acknowledging the great work done in the preparation of this Zero Draft the World Bank presents its comments as food systems and nutrition are of high relevance to our work.

The urgency of the call for shaping food systems to deliver improved nutrition and health while reducing its impact on climate change and thus foster resilience should be strengthened. That is, highlighting the sustainable component of food systems, for food systems that tackle food security but are not climate smart do not serve their purpose for they hinder resilience.

The current pressure of climate change and climate-related risks on food systems is so high that even countries that have achieved SDG2 could fall back into a food insecure status. Hence, we propose the opening statement of the document includes the fundamental concepts of resilience, nutrition and sustainability, thus clarifying from the start that food systems need to cover all three to be actual viable solutions to food insecurity.

It is important to keep in mind that food security is not only about quantitative caloric needs but qualitative nutritious diets. Chapter 1 overall reflects adequately the current situation of malnutrition. However, the actual costs of malnutrition and the loss of human capital are not specifically addressed in the “Background and Rationale”. Malnutrition imposes large human, economic, fiscal, and social costs. At an individual level, it leads to maternal and child mortality, child stunting, poor learning capacity, and lost productivity and incomes for adults. At macroeconomic level, malnutrition leads to high health costs, lower current and future labor productivity, and slower economic growth. The World Bank estimates annual economic costs of $3.05 trillion in loss of global GDP because of under- and malnourishment as well as of overweight and obesity alone ([Do the costs of the global food system outweigh its monetary value?](https://blogs.worldbank.org/voices/do-costs-global-food-system-outweigh-its-monetary-value)). Regarding poverty alleviation, malnutrition not only perpetuates poverty in affected populations but is also part of a cycle in which it fosters poverty and poverty perpetuates malnutrition.

The following comments take into consideration inter alia the [World Bank’s work on Future of Food – Shaping the Global Food system to Deliver Improved Nutrition and Health](https://www.worldbank.org/en/topic/agriculture/publication/the-future-of-food-shaping-the-food-system-to-deliver-jobs), which highlights the food system’s contribution to jobs by supporting growth in food value chains, ensuring that policies and investments improve the quality and quantity of jobs, and facilitating the inclusion of more women and youth.

**Structure**

We welcome the structure of the Zero Draft modelled after other CFS guidelines like the “Voluntary Guidelines on the Responsible Governance of Tenure”, and the “Principles for Responsible Investment in Agriculture and Food Systems” or of other bodies like FAO/WHO Codex Alimentarius:

1. Rationale and Background (as presented in Paras 1-16)
2. Objective and Purpose (as presented in Paras. 17-19)
3. Guiding Principles (as presented in Para. 36)
4. Key Concepts concerning Food Systems and Nutrition (as presented in Paras.27-33)

But we feel the document would gain in clarity in shortening and focusing the respective paras esp. background and rationale highlighting the aspect of sustainability and costs as described above. The section on objectives and purpose would benefit from a reorganization.

**Specific Comments**

**Para 6:** Contaminated food also contributes to poor health outcomes and impacts 1 in 10 people globally each year. It is mentioned but the emphasis lies on “lack of stable access” rather than the aspect of healthy and especially safe diets.

“Malnutrition in all its forms has many interrelated basic, immediate and underlying causes that need to be addressed simultaneously. Among those: unsafe food and foodborne diseases, the lack of stable access to healthy and safe diets and safe drinking water, inadequate infant and young child caring and feeding practices, poor sanitation and hygiene, insufficient access to education and health services, income poverty and low socio-economic status.”

**Para 7**: Economic slowdowns and downturns should be included as an important cause of malnutrition as well as their impact on food security and nutrition as highlighted in SOFI 2019.

**Para 9** Seemsto only address producers and consumers as shaping the food system leaving out the value chain in between (handling, storage and distribution, processing and packaging, retail and markets). Clarification of the concept/definition of producer desirable.

**Para 10:** Digital technologies are already changing behavior and should be mentioned.

**Para 12:** Finance and investment are important policy elements and should be included as they help shape policies and interventions to fight malnutrition.

We would like to propose a new

**Para 15.bis.** that could include the World Food Summit Declaration of 1996 that highlighted the role of food safety towards food security, and the 2018 UNGA Declaration that established Food Safety Day.

The Objective is currently contained in Para. 18 should open the section 2. Objectives and Purpose and should be followed by paras 17. Additionally, Para. 18 should be amended by including ‘sustainable’:

“The objective of the Voluntary Guidelines is to contribute to reshaping or promoting sustainable food systems to ensure that the food that contributes to healthy diets is available, affordable, acceptable, safe and of adequate quantity and quality while conforming with beliefs, cultures and traditions, dietary habits and preferences of individuals in accordance with national and international laws and obligations.”

**Para 19** seems to be more adequate included in the section on guiding principles.

**Para 21** should include food safety:

“Sustainable food systems that promote healthy and safe diets are integrally connected with issues related to trade and investment, climate change, biodiversity and genetic resources, among others, which are all addressed in dedicated normative intergovernmental processes. Different actors dealing with these matters need to refer to, and build upon, each other’s resolutions and declarations, promoting coherence and addressing policy fragmentation, without duplicating efforts or moving beyond their mandates.”

**Para 24:** The five main categories and related drivers identified by HLPE which impact the functionality of food systems are not an objective or a purpose and should be integrated into chapter 3.

**Para 26:** Worker Associations (processing plants/whistleblower etc.) and Business Associations might be included among the target stakeholders.

**Para 27**: Food Systems should explain the three components, for they are mentioned further in the document. Mentioning that at this point would give clarity and prevent back-and-forth reading.

**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?**

**General Comments**

The Title of Section 2 should read **“**Guiding Principles for reshaping and ~~or~~ promoting sustainable food systems.” The rationale is the aim to achieve integrative solutions that cover both food security and sustainability, acknowledging that food systems have a role to play in climate change.

Three general messages should be given consideration as guiding principles in this chapter or as a chapeau at the beginning of the implementation chapter:

* Shaping food systems requires strong leadership. Effectiveness requires multisector thinking to ensure alignment of sectoral policies and interventions with common nutrition and health objectives.
* Food systems are very complex and therefore it is important to consider synergies, trade-offs and negative effects.
* Strong Food Safety Systems require capacity building.

**Specific Comments**

**Para 36:** Evidence-based approach inherently implies data and research to foster change. Data are only mentioned very specifically in chapter 3 para 43 k), research in the chapeau of para 43 and 43 h) linked to agricultural research. Both are horizontal topics and might be mentioned as a separate principle.

We would like to include Food Safety as a key concept and guiding principle, for there is no food security without food safety. States should take measures to ensure that all food that is available to consumers is safe and consistent with national food safety standards.

**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?**

**General Comments**

It is important to better understand and address the political economy factors. Shifting biased consumer food policies and production subsidies away from traditional staples in low- and middle-income countries, and from processing ingredients such as corn sweeteners, corn starch, and soy oils in high-income countries, to a more crop-neutral policy and subsidy system has both winners and losers. Entry points for moving forward include

1. better understanding the nutrition and health costs of current policies and the gap between a country’s agricultural and nutrition/health policy objectives;
2. increasing the voice of broader stakeholder groups (for example, consumers, nutritionists, researchers) in agricultural policy dialogue; and
3. understanding who the winners and losers from policy shifts and creating options for bargained compromises (such as compensation or adjustment support for losers).

In addition, to avoid conflicts of interest, food regulatory agencies, which become increasingly important as per capita incomes increase, should be public entities funded by government, and not rely on private company user fees. Clear dietary guidelines drawing on nationally recognized nutrition and medical researchers, academics, and practitioners can help guide the regulatory agencies. Dietary guidelines vary across countries (and over time). Given the growing concern about rising obesity, perhaps a global guideline on healthy diets could help develop a clearer consensus to inform subsequent national regulations on certain foods.

Based on the World Bank Document “The Future of Food: Shaping the Global Food System to Deliver Improved Nutrition and Health”, we would like to highlight the entry points listed below. As these can be many, we would like to propose that they could fall in an annex to the Guidelines, as examples of specific policy and calls for action.

**Important policy entry points:**

* Spectrum of food system interventions to reduce energy deficiency (hunger)
  + Increase crop, livestock, and aquaculture productivity and resilience, and fishery sustainability to ensure availability of sufficient calories.
  + Reduce net taxation of agriculture and facilitate trade.
  + Reduce food loss through improved supply/demand coordination and storage.
  + Support home-grown school feeding programs.
  + Ensure policy consistency to reduce food price volatility.
  + Support public campaigns to reduce food waste.
* Spectrum of food system interventions to reduce micronutrient deficiency (hidden hunger)
  + Align producer price and production policies with shifting consumer demand.
  + Promote a more diversified crop/farm enterprise production systems, including through homestead gardens.
  + Integrate balanced diet and nutrition modules in agricultural extension.
  + Increase discretionary income earning opportunities and promote labor saving technologies for women.
  + Increase research and development on more nutrient-rich crops (use nutrient content as one of the criteria in plant breeding).
  + Support the development of biofortified crops and use nutrient content as the main criterion for plant breeding.
  + Promote micronutrient fortified fertilizers.
  + Promote food fortification and its regulatory framework.
  + Expand nutrition education and demonstration in schools and at household level.
  + Expand home-grown school feeding programs designed to deliver micronutrients.
  + Promote the dissemination of dietary guidelines (to combat micronutrient deficiency).
* Spectrum of food system interventions to reduce excessive net-energy intake and unhealthy diets (overweight/obesity)
  + Improve food labeling that is harmonized with international standards.
  + Improve consumer understanding of label information. Foster regulations that put consumers at the center, promoting understanding of label information and nutrition principles.
  + Restrict food and beverage advertising, especially to children.
  + Limit specific dietary factors (such as trans-fat).
  + Reduce subsidy biases for processed foods.
  + Seek and support consumer engagement in regulatory and program development.
  + Tailor dietary guidelines specifically to combat overweight and obesity.
  + Reduce subsidy biases for foods high in salt, oil, and sugar; and consider the use of taxes to influence consumer behavior.
* Spectrum of interventions to improve food safety (health)
  + Apply regulatory and knowledge-enhancing measures to address the misuse of pesticides.
  + Control and reduce antibiotic use in livestock and aquaculture.
  + Mitigate any negative impacts on human health from irrigation infrastructure.
  + Control aflatoxin.
  + Modernize food safety regulations and oversight.
  + Foster regulatory coherence.
  + Support private operator food safety management.
  + Upgrade hygiene and management of informal markets.
  + Improve risk assessment policies towards rapid response and risk communication.
  + Capacity building for strong food safety regulatory systems.

**Specific Comments**

**Para 42**: food safety should be a cross-cutting component along the whole Food Supply Chain (as opposed to only a relevant area in handling, storage and distribution). If food is at this early point not safe, the entire population is under risk. Food safety incidents at this point can easily spread to different production lines and affect various products and hence large proportions of the population.

**Para 43 j):** this area should be food safety, with AMR being one of its factors. Or they can remain separate points but including an i.bis. with food safety.

**Para 43 k):** Add economic slowdowns and downturns to the list of threats.

**Para 44 b):** Add invest in modern food safety systems and oversight

**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 policy-making?**

Countries can take a broad spectrum of actions in the food system to improve nutrition and health through a combination of improved knowledge, sound policies, regulation, and investments. There are many tested solutions (s. above), but no “one size fits all”. Countries need to tailor policies and the combination and form of interventions to their own circumstances. Doing so will require leadership, a greater focus on the needs of women, more collaboration between institutions and sectors, learning and innovation, and broad partnerships. Working together will help shape the global food system to deliver improved nutrition and health for the benefit of both current and future generations.

Furthermore, in shaping food systems countries need solutions tailored to their needs. These are different according to the type food system and the type of malnutrition which prevails. The guidelines could help identify the different levels of attention needed at food producer, processor/distributor and consumer level in accordance with the relevant food type system.

Special attention should be given to interventions addressing child nutrition. Analysis in Guatemala shows that individuals who received nutritional care as children and were not stunted at age 3 were 33 percentage points less likely to reside in poverty as adults. Stunting of children can undermine the future competitiveness of countries, an effect that may be amplified with the shift to a more knowledge intensive and digital world.

Monitoring and evaluation are also critical. Continually building the evidence base on the impact of food system actions on nutrition and health outcomes is necessary. New survey data that collect both farm-level production and nutrition-related data are providing more opportunities to build the evidence base. Government programs need to increasingly use more common sets of metrics to measure nutritional and health-related outcomes through food system interventions, such as dietary diversity. A larger knowledge stock of impacts can help inform future government budget and donor fund allocations, and the design of programs for higher future impacts.

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

These VG should offer governments and stakeholders a framework with guidance on how to approach food systems in their countries and to define, implement and monitor policies and interventions tailored to their needs. Greater attention should be given to the role of international standard-setting bodies such as FAO/OMS Codex Alimentarius Commission, the International Organization for Animal Health (OIE) and the International Plant Protection Convention (IPPC) as a reminder of the relevance of international standards for food safety and the impact they have on food security.

It might be helpful for users to complement the VGs by good practices and exemplifying interventions as components of policies adapted to different situations and needs – possibly in an annex or as a separate document.

It might be useful to include guidance on capacity building at different levels, to strengthen food safety systems including government and private sector, improve risk communication and consumer awareness, and empower consumers as a driver to better food systems. Capacity building could include dissemination of lessons learned through targeted knowledge events at national and regional level.

## [Brenda Kaijuka Muwaga](http://www.fao.org/fsnforum/member/brenda-kaijuka-muwaga)****,**** UNICEF, Uganda

Thank you very much for the opportunity to review this guideline which will be very useful for numerous governments and stakeholders working towards strengthening the food systems for improved nutrition.

I have taken time to review this and have made some comments in the attached document.

Kind regards,

Brenda Kaijuka Muwaga

Independent Nutrition Consultant

**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?**

Comments (BKM)

Role of diets in influencing all key nutrition outcomes should be emphasized.

This chapter provides a general overview of the problems being faced but does not elaborate on the underlying or basic causes, challenges, bottlenecks and barriers affecting particularly LMIC’s from ensuring healthier diets of their populations.

My observation is that it is the critical policies, legislations and strategies that have been developed without sufficient effort put into understanding the context specific food system bottlenecks. The food system is currently failing our populations in LMIC. We do not have sufficient experience or examples of innovative trade, subsidy or incentive policies that can transform the food system etc…

According to paper by Mozzaffarian, D., et al. (2018). British Medical Journal. Role of government policy on nutrition; barriers to and opportunities for healthier eating, policies, legislation, or “fiscal incentives and disincentives aimed at consumers, producers, and retailers have more consistent evidence of effectiveness”. That is, these are potentially much more impactful or transformational if governments deliberately implemented them. However, this is far from the case.

Another barrier affecting attainment of nutrition goals and targets, is that governments, donors, UN stakeholders and others still remain cautious about engaging the private sector yet they are critical players at every level within the food system. I also think that governments, donors etc are not yet very clear on HOW to engage the private sector and/or on types of partnerships. For example, there is a lot of rhetoric on the need to establish Public Private Partnerships on nutrition but at country level, these arrangements remain rhetoric and with limited expertise and experience in establishing them.

It would be good if this guideline could emphasise this at the onset in Chapter one.

Lastly, Chapter one does not elaborate on other key bottlenecks such as leadership, governance, accountability, poor functionality of coordination structures among others. One of the most critical bottlenecks is that the multi-sectoral platforms for nutrition are often not institutionalized or formalized.

**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?**

Under Objective and Purpose of the guideline, emphasis could be on providing practical and actionable solutions for Governments and stakeholders to adopt. Avoid generic or broad solutions.

Under Drivers, paragraph 24: under political and economic drivers mention both food and nutrition policies, strategies and legislation (or lack of appropriate pricing, fiscal incentives and disincentives etc..). In addition, another key driver is nutrition governance, leadership, capacity, evidence and accountability.

Missing from the list of principles for this guideline include;

Under Coherent and Context specific policies; again there is a need to elaborate further on this as opposed to simply stating “policies” i.e. policy interventions are at different level (national, regional, district, sub-county etc) have different targets (consumers, food industry, govt sectors, producers etc.), different domains (population education, fiscal policies, food quality standards, research and innovation etc) and approaches or mechanisms. Refer to Box 1 in paper by Mozaffarian et al (2018).

Part of the challenge is that many countries have not conducted in depth policy reviews or policy impact assessments to determine if the policies in place are appropriate or not to address healthier diets or improved nutrition. Furthermore, many countries do not really know what these policies should look like and may need support to define these.

Missing are principles for good governance, accountability, leadership and coordination.

**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 elements of food systems policy entry points stated; food supply, food environment and consumer behavior are well elaborated however, what I feel is missing is the entry point that brings it all together. For example, there are policy related actions identified under each element however, another entry point would be needed to support these. Thus, a separate element on enabling environment for ensuring adequate FS and nutrition may be required. This would include all the critical elements of accountability, leadership, policies, legislation, taxes, fiscal incentives/disincentives, capacity, coordination, research/monitoring and innovation etc. This element would be responsible for ensuring coherence across all sectors etc.

Other comments;

Section 3 (Processing, Packaging) under policy relevant areas, consider fiscal incentives or disincentives for industry producing healthy (incentives) or unhealthy (disincentives) e.g. products with high sugar, high fat, high salt and alcoholic beverages.

Establishing PPP’s to support food industry to produce high quality nutritious foods could be considered…..HOW remains the main challenge so, it would be good to explore this further in this guideline?

Under Section 4: Retail Markets

Support to small holders – emphasise support to women or women groups

The need to support small holders organize themselves into groups or cooperatives is critical since this will give them power to negotiate prices and will support stronger ties with retailers or the markets.

Supply of nutritious foods

The language in the guideline should provide more practical guidance e.g. “encourage retailers to supply healthier foods” is not enough. How do we encourage them? Is this through incentives? What are the instruments required to achieve this? Tax incentives etc….

Again, restricting marketing of processed products with high fat or sugar and salt or high alcohol content etc.. HOW SHOULD THEY DO THIS? Trade policies – types?, pricing policy, taxation etc?? Provide examples.

Food Environments (Section 2: Economic Access or Affordability)

Provide examples of the type of nutrition sensitive trade policies….or is it legislation that should be first prioritized?

Consider taxes to regulate prices. Use of revenues from taxes to fund food security and nutrition programmes or PPP’s??

Consider adding; governments could subsidise costs for marketing or advertising nutritious or healthy foods.

Nothing was mentioned on the coordination or governance approaches to ensure all these recommendations and actions are implemented under Chapter III.

**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 policy-making?**

Most of these have been mentioned in my comments above;

It will be critical for governments to adopt the necessary legislation required to initiate the various policies, fiscal incentives/disincentives, subsidies for farmers or farmer groups/producers and retailers?, trading policies – controlling imports and exports – favouring local and indigenous healthy food products, pricing policies etc.

Target mainly producers or manufacturers domineering the food markets and that supply unhealthy or processed foods; high sugar, high fat, refined grain. However, this should be in balance with the need to support industries to thrive etc…

Revenue from taxes etc can be used to directly fund ongoing food security and nutrition programmes or PPP’s etc.

Marketing and labelling standards

Food and nutrition policy reviews (impact assessments) will be required to ascertain the policy environment across sectors affecting the entire food system or food supply chain. This will be able to guide the type of policies that are required.

Mechanisms such as PPP’s should be actively developed to drive demand and availability of nutritious and healthier foods etc..

An ideal food system would be one whereby there are appropriate controls and measures at each level to ensure a balance between encouraging an active and liberalized private sector with one where those that are producing unhealthier products are disincentivised or taxed a little higher to support government initiatives and programmes.

An ideal food system to me is one where by Government is in the driving seat of what is happening in both the public and private sectors, is responsive to the needs and/or what is beneficial to its population. This is opposed to a completely liberal market without controls or measures which is unfortunately the case in many LMIC especially in sub-saharan Africa.

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

These would be extremely beneficial to governments, donors, multi and bilateral organization, CSO’s and academia to develop appropriate food and nutrition policies, strategies and programmes (including research). For example, Uganda is currently finalizing its Uganda Nutrition Action Plan II (2018-2025) and thus, the completed CFS voluntary guideline even in its current draft form will be beneficial to identify policy entry points that could be transformational in ensuring a food systems lens is applied in future food security and nutrition programmes.

## [Kate Oldridge-Turner](http://www.fao.org/fsnforum/member/kate-oldridge-turner)****,**** World Cancer Research Fund International, United Kingdom

Dear CFS colleagues,

Please find attached the contribution from World Cancer Research Fund International on the Zero Draft of the Voluntary Guidelines on Food Security and Nutrition. We are grateful for the opportunity to input into the zero draft and we look to forward to collaborating on this important document.

Kind regards

Kate Oldridge-Turner

Head of Policy and Public Affairs

**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?**

**General comments:**

We welcome the ambition to develop evidence-based guidance and promote policy coherence and address fragmentation in food systems. We believe that the current food system is not delivering healthy diets and requires significant transformation. To achieve this, we urge that the guidelines reinforce and promote robust evidence-based policymaking to the highest standards of governance, transparency and accountability.

We think there could be further elaboration on the impact of food and nutrition on the global burden of disease and the significant contribution that poor diet and nutrition makes. For example, our evidence shows that body fatness and weight gain increase the risk of up to [13 different types of cancer](https://www.wcrf.org/dietandcancer/exposures/body-fatness).

**Specific comments:**

**Para 9**: We think the following text should be added as follows: ‘Food systems and diets are major contributors to the nutritional and health status of populations”.

**Para 10:** We think the following text should be amended as follows ‘Fostering policy, institutional and behavioural changes are key to reshaping or promotion sustainable food systems that improve nutrition and enable healthy diets that meet the evolving dietary needs of growing populations.

**Para 24 (c):** We welcome the consideration of including fiscal policies separately (which is broader than food policy) (which would be in addition to the categories in the five areas highlighted by the High-Level Panel of Experts).

**Para 26**: Caution should be applied in listing the private sector in policy discussion and implementation processes. There should be stipulated limits in the role that the private sector (namely food manufacturing companies) should play, given that these companies are often the targets that policy makers seek to regulate. Managing conflict of interest should be a key priority.

**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?**

**Para 36 (c):** We think there should be a specific mention of policies that contribute to the reduction of non-communicable diseases.

**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?**

**General comments**:

From our experience of monitoring food policy around the world (through [our policy database](https://www.wcrf.org/int/policy/nourishing-database) NOURISHING), we have seen that voluntary policy action is not as effective as mandatory policy action and is very vulnerable to conflicts of interest and industry interference. Therefore, when Part III is developed in further drafts we consider it would benefit from the most rigorous wording possible in relation to good practice policy design. We would advocate that the guidelines promote mandatory measures where possible as it is shown that these are the most effective tools for delivering change within the food system.

**Specific comments:**

**Para 40:** We think it would be worth adding an objective to the Voluntary Guidelines around ‘supporting robust and evidence-based policy design’.

**Para 41:** It would be helpful to add ‘managing conflict of interest’ explicitly when talking about transparent and accountable governance of food systems.

**Para 43:** Managing commercial practices and conflict of interest to promote healthy eating would also be welcome throughout a-k.

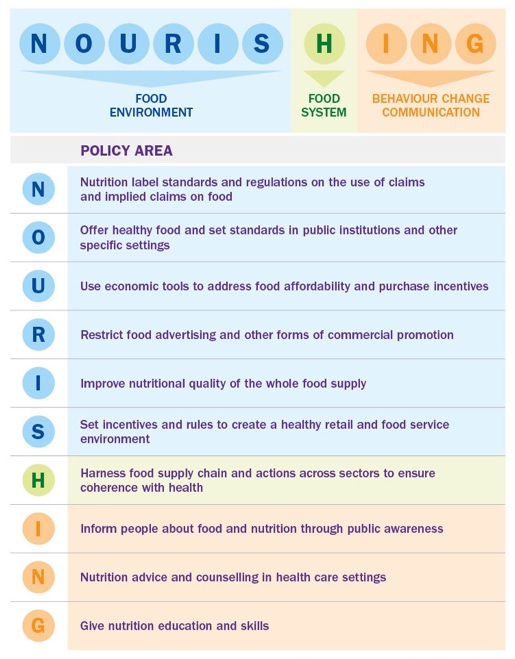
**Para 47:** It would be good to understand why the [WHO Best Buys and other recommended interventions](https://apps.who.int/iris/handle/10665/259232) are not explicitly cited in the section relating to Food Environments as this would aid policy coherence and address policy fragmentation.

Furthermore, it is important to add civil society, who also have an important role in supporting the shift towards healthier and more sustainable food environments.

**Para 50 (b):** We welcome the inclusion of fiscal policies in the document as evidence shows this is an effective way to change consumption patterns. However the introduction of fiscal policies can be vulnerable to attack from the private sector so the guidelines should reflect robust and transparent policy development processes. More information about designing and implementing sugar sweetened beverage taxes (which can apply to other fiscal policies) can be found here in our report [‘Building Momentum: Lessons on implementing a robust sugar sweetened beverage tax.](https://www.wcrf.org/int/policy/our-publications/lessons-implementing-sugar-sweetened-beverage-tax)

**Para 51 (b)** It would be good tostate that mandatory labelling (where possible) would be the preferred option. More information about designing and implementing front of pack labelling can be found here in our report [‘Building Momentum: Lessons on implementing a robust front-of-pack labels.](https://www.wcrf.org/int/policy/our-publications/lessons-implementing-front-of-pack-label)

**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 policy-making?**

We have the [NOURISHING policy framework](https://www.wcrf.org/int/policy/nourishing/our-policy-framework-promote-healthy-diets-reduce-obesity)  which lists a comprehensive package of policy interventions that can address non-communicable diseases and obesity. We believe these should be considered in the design of any food system. The framework is supported by a [database](https://www.wcrf.org/int/policy/nourishing-database) which list examples of policy actions and evaluations.

Furthermore, we have developed an index tool within the NOURISHING policy areas that is undergoing finalization. The index tool is designed to benchmark governments on their nutrition policy environments. The policy index comprises policy areas, benchmarks, indicators and a coding scheme which attributes values to good practice policy design. The elements of the most effective nutrition policy design have been developed with experts to establish an aspirational standard to hold governments to. It is important to note that the index and indicators present a suite of policy options and do not represent a hierarchy of desired or preferable policy options.

It is possible that some policy indicators outlined in the policy indexes are not currently implemented by any government, but through expert consultation, the most practical aspirational policy options were developed to create a robust and comprehensive benchmark.

We would be happy to share a copy of the index with the CFS in the coming months when it is finalised to support the development of the Voluntary Guidelines further. Please contact Kate Oldridge-Turner ([k.oldridge-turner@wcrf.org](mailto:k.oldridge-turner@wcrf.org)) if this is of interest.

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

It would be difficult to give an objective answer without seeing an updated draft and to see how the guidelines manage challenging areas such as conflict of interest; and if it promotes mandatory regulation in a range of policy areas. It would be welcome to have the support and legitimacy of the CFS to encourage stronger policy action in this area.

## [Magdalena Ackermann](http://www.fao.org/fsnforum/member/magdalena-ackermann)****,**** CSM's Working Group on Food Systems and Nutrition, Italy

Dear CFS colleagues,

On behalf of the Civil Society and Indigenous Peoples' Mechanism (CSM) Working Group for Food Systems and Nutrition, we are pleased to share our collective submission and comments on the Voluntary Guidelines on Food Systems and Nutrition.

Best regards,

CSM WG on Food Systems and Nutrition

**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?**

* Firstly, and more generally, we would like to raise that it is important for the Introduction to explicitly present the Guidelines as a CFS output, locating it in the CFS mandate and the progressive realization of the right to food. Moreover, the Guidelines should not to be looked at in isolation, but in the context of other policy outcomes/instruments of the CFS, including the VGGT, RAI and FFA, as well as the FAO Guidelines on Small Scale Sustainable Fisheries.
* In relation to the specific questions posed: The Background of the Zero Draft focuses on describing various forms of malnutrition and their consequences. However, the many challenges around the dysfunctionalities of food systems are not addressed. There is a need to deepen the analysis of the current status of food systems as well as of the causes of malnutrition outlined in para 6. Specifically, we suggest enhanced understanding of who controls resources, who sets the agenda, how critical resources including land are being appropriated and used, issues of corporate capture, and the profound injustices that exist throughout the food system. Such understanding is crucial for orienting us in the type of measures required to build food systems that are just and contribute to both human and planetary health.
* In the same line, the Objectives of the Guidelines should not merely be to “tackle problems” but rather to give guidance on how to reshape current food systems in order to avoid malnutrition.
* Already in the Background it should be made clear that health cannot be understood in isolation from its social and ecological foundations and that all of these dimensions need to be addressed simultaneously in order to truly transform food systems. Scientific evidence shows that, within the current hegemonic system (led by the agro-industrial production model), harms towards expressions of life and ecosystems are greater, and that the latest has affected the food cycle in an integral way by reducing its duration into very short units of time.[[114]](#footnote-114) Therefore, there is an urgent need to realign food systems with the above mentioned multiple foundations if we really want to follow the path towards the fulfillment of the right to adequate food and all its interrelated human rights, the protection of the planet and its biodiversity, and the sustainable development scope.
* The Background should explicitly mention human rights violations – including violations of women’s rights, children’s rights, workers’ rights, peasants’ rights, and indigenous peoples’ rights – as key causes of malnutrition that need to be addressed transversely by the Guidelines.
* The Background should also place attention on the various crises occurring in different parts of the world – natural disasters, armed conflict, disease outbreaks, etc. These crises cause instability, displace populations, and cause major disruption of local food systems and open these to entry of foods that may not be most appropriate for nurturing health.
* New drivers of malnutrition, such as the dematerialization of food, should also be mentioned.
* Women’s crucial role in food systems needs to be better articulated. While women are key actors in the food systems – including among others in being custodians of knowledge, evolving culture, production, food choices, and care of both human and non human forms of life (i.e. seeds, livestock, fisheries and flora) – they are also highly affected by malnutrition and face multiple violations of their human rights.

1. The Background and Rationale section highlights pregnant and lactating women, adolescent girls and children under five among the most vulnerable groups at risk and suffering malnutrition. It does not speak though of the multiple discrimination and violations of rights women overall face and these being key causes of malnutrition. Nor does it mention the highly unequal gendered division of and depreciation of reproductive and care work.
2. An intentional effort to discuss and promote women’s leadership and rights in all areas of food systems needs to be done within these guidelines. The knowledge, time, energy that women across societies bring in for ensuring food production and mainly food transformation and preparation within and outside the household is largely unpaid. This very experience should not be erased by a discourse on nutrition that appears all rooted in industrialised, profit-based food system. The centrality of the experience of women in ensuring nutrition needs to be reclaimed, for:
   * ensuring better promotion and leadership of women within the policy discourse aimed to correct dysfunctional food systems;
   * for recentering the discourse away from the current dominant tone of the document that seems to be only interested in defining food systems around market economy. The care and non-profit based economy, with the broad complex of transaction across human relationships, should be recalled and considered to expand and diversify the underlying reference scenarios that the document is and will be hinting at.

* The evolution towards nutrition and healthy diets is heavily shaped by industrial systems, and this is not sufficiently addressed in the underlying problems that hinder food systems to deliver healthy diets. Caution should be paid to industrially driven solutions to malnutrition. These may deepen existing inequalities and other dysfuncionalities of food systems, while distracting from solutions that embrace and foster existing crop and dietary diversity and strengthen food sovereignty based on small-scale farming and agroecology.
* Consumers are also tax payers. Therefore, awareness should be raised to inform people more about the large number of subsidies that go into conventional agriculture and in general in unsustainable industrialised global and capitalistic food systems. The monopoly of information through publicity and commercials, playing a major role in the underlying causes of malnutrition, in current dominant food systems need to be counteracted through policies and intentional public measures.
* A key underlying challenge within food systems and barrier to transition to more just and healthy food systems lies in the lack of inclusive policy making processes that provide the necessary conditions for meaningful participation of groups affected by malnutrition and protect public policy space from undue influence of powerful corporate interests. Experiences with critical knowledge coming from the most affected are often ignored, while these should be key evidence in these policy making processes.

**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?**

1. Human Rights framing of the guiding principles:

It is imperative to strengthen the human rights foundation of the Guidelines by including more prominently the human rights framework within the guiding principles. The CSM firmly believes that this is the framework in which the Guidelines should be developed, implemented, and monitored, and which should guide the transition towards sustainable and healthy food systems.

We welcome the inclusion of a principle on the Right to Food (f). At the same time, we would like to highlight that a key characteristic of human rights is their **indivisibility and interrelatedness**. The right to food cannot be looked at in isolation from other human rights and its nutritional dimension clearly demonstrates this. It is impossible to ensure good nutrition without realizing not only other dimensions of the right to food but also other rights that are inextricably linked to the right to food, such as the right to health, to land, to work, to a healthy environment, to education, and so on. Similarly, it is impossible to think of the right to food without ensuring women’s rights, children’s rights, peasants’ and indigenous peoples’ rights, the rights of workers, and so on. The Guiding Principles should reflect this.

The CSM would also like to emphasise that the main purpose of the guidelines is to address the multiple food systems challenges faced by people - who at the same time are the main agents within food systems. It is therefore key that the Guidelines and the process of elaborating, implementing, and monitoring them is **people-centered**, and a Guiding Principle added on this.

1. Concrete Proposals for the guiding principles:
2. Clause 35:
   * A reference to the right to food should be included. The CSM also suggests including a footnote at the end of the sentence with a reference to the CFS Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security. The proposal for the text is as follows:

*“The Voluntary Guidelines will include a number of guiding principles that should be followed to contribute to reshaping or promoting sustainable food systems, enabling healthy diets, improving nutrition and promoting sustainable development* ***in line with the progressive realization of the right to adequate food and in the context of the indivisibility of human rights”. [[115]](#footnote-115)***

1. Clause 36:
   * *Systemic and holistic and evidence-based approach (a)***:** We appreciate this principle but are concerned that the term “evidence based” could be limiting with risk of not including the knowledge and wisdom held by local communities including indigenous peoples and peasants in relation to healthy and sustainable food systems and diets. The CSM urges that rather than emphasizing on ‘evidence-based approach’, which is lodged in academic scientific findings, there should be a more holistic approach that encompasses existing traditional, indigenous and cultural knowledge of people and food producers, with emphasis on local communities and indigenous peoples. This could also be clarified in the definitions.
   * *Coherent and context-specific policies (b)*: The Principle should be expanded to include not only policy coherence, but policy coherence **with human rights**.
   * *Healthy people, healthy planet (c):* We welcome this guiding principle and suggest including a reference to the right to health here.
   * *Gender equality and women’s empowerment (d):* Women play a central role in food systems. Therefore, they must be recognized as having the right to self-determine themselves and their bodies and to live free from violence. It is thus essential to reaffirm women’s rights and gender equality. The CFS Forum on Women’s Empowerment recognized that women’s empowerment, gender equality **and women’s rights** are strongly interrelated and need to move ahead together and thus should be considered in future policy outcomes and processes. The CSM therefore strongly suggests adding explicit reference to women’s rights in this principle. We would like to raise the concern of continued attempts to backpedal on fundamental human rights with language that undermines women’s rights.
   * *Nutrition Knowledge and awareness (e)*: This principle ignores the already existing diversity of knowledge by communities themselves, particularly by small-scale food producers on food and seed systems and nutrition. Therefore, it should be revised to include food traditions and culture heritage in order to protect and enhance them. Additionally, elements limiting the excessive and abusive marketing practices, particularly in the context of children rights and healthy diets, should be included.
   * *Capacity*-*building (g):* The reference to scaling-up nutrition programmes should be removed.
   * Further principles to be added:
     + To ensure people-centeredness of the Guidelines, the CSM proposes an additional guiding principle:

“*Recognize the centrality of people, in particular small-scale food producers and women, and their agency in shaping food systems and nutritional outcomes. The primary focus should be on the people most affected by malnutrition in all its forms and overcoming the challenges they face.”*

* + - *Realization of workers’ rights to living wages and decent working conditions.* Further stress needs to be addedto children’s rights, particularly in the significant presence of child labor.
    - *Equality and non-discrimination*: Existing inequalities and structures of oppression should be overcome in order to guarantee the full realization of the rights of discriminated, disadvantaged and marginalised groups. These are in particular: refugees and displaced people, disaster affected communities, elderly, children, youth, differently abled, groups marginalised on the basis of gender, caster, race or religion. The transition to healthy and sustainable food systems should be guided by this principle and informed by the experiences, knowledge and perspectives from these groups.
    - *“Public interest should be protected through robust safeguards against conflicts of interest in the elaboration and implementation of public policies to promote the transition of food systems. Addressing conflicts of interest needs to be a priority and mechanisms for identifying and acknowledging them must therefore exist”.*

The CSM takes this opportunity to raise some additional comments on the definitions proposed by the Zero Draft:

1. Proposals for the definitions:

The Guidelines present a new framework and therefore offer a precious opportunity to establish new definitions and/or review established ones to adapt them to the comprehensive and multidimensional approach that this process requires. Rather than technical and prescriptive definitions, the CSM would like to see political definitions that capture the essence of the concepts referred to in the Guidelines.

Some of the following comments on the definitions might actually be unnecessary depending on the final structure of the guidelines.

* + *Food systems*: The definition views rural populations and their natural resources in a “productivist” way. The Guidelines should recognize that food systems are about people and communities, lives and life cycles, exposing gender relations within them, intergenerational implications and diversity offered by them by also celebrating the latest. They should adopt a definition that also recognizes the multiple public objectives served by these systems and the importance food systems have to the pursuit of sustainable development agenda.

In this line, it is important that the recall of the right to food is unfolded to question the legitimacy of the for-profit reference frame of discussions around food systems. The judgment of unsustainability and non-viability that big players in the industrialized agriculture drop on small producers shall be deconstructed and seen as motivated by personal interest. Sustainable food systems with high nutritional outcomes can (and actually are) also be based on remuneration of the work for those involved and shall not aim necessarily at producing profit for third parties.

* + *Consumers’ behavior*: The definition of consumers is problematic: the word “consumers” is used to identify individuals with purchasing power rather than as citizens with rights. There is need to emphasise the lack of choices that citizens face with respect to sustainable consumption that has become part and parcel of the current food systems. Further, there is a need to emphasis the importance of sustainable production and consumption as part of sustainable food systems.
  + *Healthy diets*: There is need for a qualitative rather than technical/prescriptive definition of healthy diets, moving beyond nutritional formulas, and one that addresses both healthy and sustainable diets. It is essential to bring back the term “healthy and sustainable diets”, which was dropped from the previous version. The CSM proposes the following definition:

*“Healthy and sustainable diets are diets that are affordable, balanced and varied, and provide real food and the nutrients required to live a healthy and active life for both present and future generations. They are composed of locally produced fresh and seasonal food, wherever possible, and contain a high proportion of foods that are not or only minimally processed. Healthy and sustainable diets are based on production modes that function in harmony with nature and its species, preserve and promote biodiversity, consciously use limited natural resources, respect, protect and fulfill peasants’ and workers’ rights and guarantee their livelihoods, while contributing to overall social justice.*

1. *They are diets adjusted to the personal needs of individuals (personal characteristics and circumstances), the local context, and cultural and other preferences. Beyond the combination and nutritional content of food, the way food is prepared and consumed are key determinants for a diet to be healthy and acceptable. A healthy diet also presumes the safety of food in a sense that such must be free from substances, such as chemical and industrial agents, potentially harmful to those who produce and consume it, and that such must have the adequate quantities, not harmful for health, of critical nutrients. Breastfeeding is an essential component of health and sustainable diets.”*
   * *Right to Food:* There needs to be acknowledgement of and reference to the Right to Health, Women’s Rights, Workers’ Rights, Peasants’ Rights, Indigenous Peoples Rights, Child Rights as well as emphasis on rights of small-scale producers. (See also comment above on the Guiding Principle on the RtF).
   * Further definitions to be added:
     + A new definition of the term *‘policy fragmentation’* (used extensively in the introduction of the Zero Draft) should be added, with a clear reference to policy (in)coherence. At the moment, this term is unclear, and this lack of clarity limits the existing recommendations. A specific definition of this term would highlight:
       - the shared responsibility for food system governance across the main sectors governing the food system (agriculture, trade, commerce, finance etc);
       - that the institutional structures in these economic ministries preference the interests of industrial food system actors, who thus influence policy with the narrow goal of extracting maximum value from supply chains – which is not in line with the broader objectives of the public interest, which include livelihoods, sustainability and nutrition. As such, food system (economic) policy thus often appears fragmented and incoherent because it does not align with food-related objectives articulated by Health, Environment and Social Welfare (and some parts of Agriculture i.e. Food security).
     + Given the pivotal role of small producers in sustainable food systems, there is a need to include a definition of ‘small-scale food producers’ and name the different categories of food producers which would include fisher folk, pastoralists, workers, and indigenous people within or outside the market-based economy.
     + *Subsistence agriculture and production for self consumption*: these tend to be organic or free from chemical inputs, so they shall also be acknowledged as an important contributor to nutrition and to the care and maintenance of environment and landscape, both in the Global North and in the Global South.

**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?**

**AND**

**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 policy-making?**

Food systems serve and support multiple public objectives within the various domains of sustainable development, from livelihoods to health, from socio-cultural to ecological ones. The “ideal” food system is a food system that promotes people’s health and well-being, 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.

The various elements of such ideal food system – looked at in their entirety – are what should guide us in the food systems transition envisioned by the Guidelines. These elements can be captured/subsumed under four main areas that span across food systems:

* **Protection and regeneration of nature**
* **Health and wellbeing**
* **Modes of food production, exchange and employment**
* **Culture, social relations and knowledge**

**Governance as critical pillar of food systems transition presents an additional fifth area.**

The CSM would like to propose these five areas as the policy entry points and overarching structure of the Guidelines. Doing so will ensure systemic transition across *all elements of food systems* in accordance with the multiple interconnected objectives of the Guidelines and thereby prevent a fragmented approach.

In addition to the five policy entry points, we propose an additional section to the Guidelines indicating *connected systems and policy domains beyond food* in which change, and transformation is needed to ensure structural policy coherence. These include health, water and sanitation, climate and environment, finances, trade and investment, and social protection.

The five policy entry points will be explained in the following together with proposals for policy and other measures States should adopt under the respective areas.

1. **Governance**

Public interest and human rights-based governance is at the heart of effective food systems transition. Meaningful participation of rights holders and an understanding of food as public interest and as human right are crucial elements of such governance.

* States have the primary responsibility for implementing the Guidelines and leading the transition towards healthy and sustainable food systems.
* States should put in place the necessary frameworks to facilitate meaningful participation of rights holders and in particular groups most affected by hunger and malnutrition in the determination of public priorities and strategies related to food systems transformation. This includes space and support for autonomous organization.
* States should respect indigenous peoples’ right to self-determination in food systems’ governance.
* States should ensure appropriate roles for different actors in public policy making and programme implementation. They should adopt robust conflict of interest safeguards and other measures required to uphold the public interest and human rights orientation of public policies and in the area of knowledge production.
* States should put in place adequate institutional and policy frameworks to foster cross-sectoral collaboration and policy coherence in line with the RtF.
* States should put into place effective monitoring and evaluation mechanisms, including prior human rights impact assessments, to ensure measures adopted in the transition contribute to the overarching objectives of the Guidelines and are coherent with the RtF. A prominent role for rights holders and those affected should be ensured in this, while undue interference by corporate actors should be prevented.
* States should put in place frameworks and mechanisms that allow people to hold them accountable for actions taken. They should also install the necessary regulatory and accountability mechanisms to hold private actors, including companies, accountable for their actions.

1. **Protection and Regeneration of Nature**

All nature is interconnected. Food systems are a vehicle for the continued reproduction of living cycles. Human health cannot be detached from planetary health.

* States should adopt measures to protect the rights of indigenous peoples to lands and ancestral territories, as well as the rights of peasants and people working in rural areas to land, water bodies, coastal seas, fisheries, pastures and forests.
* States should respect and protect the natural commons and related systems of collective use and management.
* States should take all necessary measures to prevent natural resource grabbing and environmental destruction.
* States should engage in agrarian reform to ensure broad and equitable access to land and other natural resources.
* States should promote agroecology. They should promote production practices that restore and preserve soils, water and air, recycle nutrients, and manage biodiversity and energy conservation, while contributing to the construction of egalitarian gender relationships.
* States should respect, protect and promote traditional agrarian, fishing, livestock keeping and pastoral systems of indigenous peoples and small-scale food producers that manage and use ecosystems sustainably, and the underpinning collective knowledge and innovation. Breastfeeding as adequate and true, environmentally-friendly, natural, and sustainable infant feeding way should equally be protected.
* States should promote sustainable management and conservation of ecosystems for the continued availability, quality and reliability of water for domestic, agricultural, and food-related uses. They should prevent contamination of water bodies and restore those which have been polluted.
* States should foster the conservation and restoration of agro-biodiversity and development of new varieties. They should protect peasants’ seed systems and related rights.
* States should conserve and contribute to the regeneration of native forests recognizing their contribution to dietary quality and diversity, ecosystem services and other functions.
* States should provide an enabling policy environment for food production in urban spaces.

1. **Health and Well-being**

Health is a state of physical and mental well-being. Food is a key determinant of health. The rights to food and health are indivisible.

* The promotion of diversified diets based on fresh, minimally processed and home-prepared meals should be the cornerstone of public strategies to address malnutrition and promote good health. Such strategies should entail both measures related to the production food (e.g., support for diversified, agro-ecological production systems) and the consumption of food (e.g., nutritional assessments contemplating territories, population groups, communities and their needs, food-based dietary guidelines and coherent policy frameworks).
* States should adopt policies to support the transformation of quality unprocessed foods into meals. This includes promotion of healthy traditional culinary cultures and culinary education in schools and community centers.
* States should adopt measures to discourage the production and consumption of ultra-processed edible products (UPEP), while encouraging the consumption of “real” food (non- or minimally processed) and water. Possible measures include:
  + Subsidies
  + Tariffs / taxes
  + Drinking water in public spaces
  + Front of package labelling
  + Restricting the offer of UPEP around daycare and schools
  + Public procurement policies favoring local healthy foods from small-scale food producers and combating obesogenic environments or public institutions.
* States should ensure food safety and prevent harm throughout the food system. Measures should protect people’s, including workers’, animals, and planetary health in a holistic manner.
* States adopt measures to ensure a healthy environment, including clean water.
* Technological interventions to address micro-nutrient deficiencies – such as fortification and biofortification – stand counter to strategies based on the diversification of production and diets. They moreover carry potential negative consequences for human health. States should avoid them, especially in light of viable alternatives.
* States should ensure that trade and investment agreements are coherent with the right to food and health, and do not interfere with the objectives of the Guidelines.
* States should recognize the healing qualities of food and medicinal plants. They should respect, protect, and promote their value and use in traditional medicine.
* States should regulate and strictly limit medicalized solutions to malnutrition – such as ready-to-use therapeutic food and micro-nutrient supplements – to emergency situations where no more sustainable alternative exist.
* States should adopt a life cycle approach to nutrition that recognizes and responds to the particularities and needs of different population groups at the various phases of their lives, while seeking to interrupt the intergenerational transmission of malnutrition. This includes particular attention to reproduction, infants and breastfeeding, children and adolescents, and elderly people.
* States should ensure that measures to enhance nutritional and health status are adjusted to circumstances and needs of particular groups. They should be respectful of identities and foster autonomy and self-determination.

1. **Mode of production, employment and exchange**

Modes of production, employment and exchange play a central role in food systems. Agroecology embodies a new vision for transforming these to respond to the multi-dimensional factors of malnutrition. It re-grounds food in nature (crucial for a healthy planet and healthy people, see b and c) and addresses the socio-economic dimensions of malnutrition by making decision making more democratic and seeking to overcome exploitative and oppressive relationships.

* States should adopt laws, policies and programmes to promote agro-ecology. They should support farming, fishing and livestock keeping practices that:
  + are adapted to agro-climatic contexts;
  + contribute to diversification;
  + are integrated;
  + enhance biological interaction;
  + minimize use of non-renewable external resources and inputs;
  + are traditional, artisanal and/or small-scale and use community-based management to conserve fish populations and fish habitats;
  + practice traditional migratory and cross-border pastoralism and conserve grazing territories;
  + enable forest dwellers to live by the diversity of forest products;
  + ensure indigenous people’s access to natural resources in their territories;
  + promote rainwater harvesting.
* States should protect and promote local / territorial markets that ensure access to diverse and fresh foods, create employment, and provide space for social interaction and exchange of knowledge. They should do so, inter alia, by:
  + Sourcing of local foods from small-scale food producers in public procurement and food assistance programmes;
  + making processing and storage equipment accessible to small-scale producers;
  + developing or improving small-scale producer targeted infrastructure;
  + limiting the expansion of large supermarkets and online purchase of food;
  + adopting pricing policies that internalize “externalities” of food production and distribution (true costs of food).
* States should phase out modes of production, distribution and exchange that cause environmental and biodiversity destruction, as well as sanitary emergencies. This includes immediate steps in the fields of:
  + pesticides and synthetic fertilizers;
  + antimicrobial misuse;
  + industrial animal rearing;
  + GMOs;
  + pollution through metals, plastic, and other residuals of production.
* Employment and work conditions are a fundamental component of food systems that needs particular attention when reshaping them. States should take measures to ensure that work and living conditions of all workers, including migrant and seasonal workers, at all stages of the food system comply with ILO conventions and provide adequate living wages. They should ensure gender equality and equal pay for all female workers, as well as the right to breastfeed and maternity protection, and take effective measures against sexual harassment and violence. Moreover, they should take measures to ensure that workers in unsustainable sectors find new adequate opportunities in the transition.

1. **Culture, social relations and knowledge**

Food is the expression of culture, traditions, and social relations. It embodies the knowledge built by communities over millennium. This is being confronted with homogenization and standardization. Unequal socio-cultural relations and power structures exist within and between societies (patriarchy, neo/post-colonial structures). These have led to unacceptable inequalities and discrimination, and the submission of some social and ethnic groups to neo-slavery conditions.

* States should take measures to promote communities’ pride in their culture, values and knowledge systems.
* States should protect and foster traditional collective knowledge, innovation and practice of indigenous peoples, small-scale food producers and local communities. They should support dialogue between knowledge systems and with research (academic and CSO) to preserve them and understand how methodologies can be supported and/or up-scaled.
* Innovation should not be equaled to new information and communication technologies. States should adopt a holistic perspective to innovation and ensure such is human rights based. They should prioritize agro-ecological innovations.
* Food and nutrition education are an important strategy for promoting healthy and diverse diets. States should place particular attention on reconnecting children and youth with nature, the way food is produced, and culinary culture. Food and nutrition education should look at food systems in their entirety and encourage critical thinking. It should celebrate the existing wealth and diversity, while recognizing the realities and constraints shaping food practices.
* States should promote local / territorial markets as important learning spaces (see d).
* States and societies should recognize and value the role of care work in food systems and nutrition (e.g., cooking, feeding, breastfeeding, care of children, sick and elderly). More in particular, they shall recognize and acknowledge the historical role that women have had and continue to have in ensuring the final key passage in food systems that ensures nutrition, which is meal preparation. Currently an unfair burden is placed on women and girls. States and societies should ensure adequate time for care work and take measures towards the redistribution of this work.

More in particular, States shall recognize and acknowledge the historical role that women have had and continue to have in ensuring the final key passage in food systems that ensures nutrition, which is meal preparation. With changing gender roles, a reshuffling of tasks within households and societies at large is undergoing and is expected to better offer all human beings similar chances. Nevertheless, the importance of food preparation knowledge and the centrality of the food preparation work in view of good nutritional outcomes shall be emphasized, while public policies can foster a conducive environment for lifestyles that include and allow time (or spaces) for workers, employees, and population in working age to be able to eat and let their family eat freshly prepared and not preprocessed food.

* States should provide timely, safe and sufficient humanitarian aid and livelihoods assistance in conformity with beliefs, culture, traditions, dietary habits and preferences.
* States should re-examine the urban-centred development paradigm. Territorial planning of food systems as well as a policy environment that meets the needs of all people impacted, including rural producers, are key in the development of rights-based policies.

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

* *Chapter IV:*
  + The implementation and monitoring must be people-centered and inclusive of the most vulnerable.
  + A new clause should be added to include “implementation principles” along the lines of those enshrined by the VGGT, including the notion of considering these guidelines as a comprehensive framework as well as the possible proposal of inclusive implementation mechanisms at national level to follow-up implementation;
  + Clause 61: The reference to MSPs should be entirely removed, given the limited evidence existent on effectiveness and positiveness.
  + *Responsibilities:* Although the document speaks of multiple stakeholders, it must be made clear that the different actors involved in the process do not have the same responsibilities with regard to the development, implementation, and monitoring of public policies needed for the transition towards healthy, social-just, and sustainable food systems (See Governance section in answers 3 and 4, see proposal of a new definition for ‘policy fragmentation’ in answer 2).

**Additional comment**

*New section on Policy Coherence***:** The systemic and integral character of the food systems transition that CFS participants have agreed upon requires policy coherence and dialogue among different institutions and negotiation processes (beyond the CFS). The transition of food systems is integrally connected to issues related to trade and investments, climate change, biodiversity, genetic resources, and food formulation, among others, with their separate normative intergovernmental processes currently undergoing. More in particular, a critical issue with respect to trade and investment policy is constraints on policy space that limit the opportunities for national action to strengthen food systems for nutrition. These policy space constraints can limit adoption of interventions like direct subsidies for food security, interpretive nutrition labelling, and restrictions on marketing of unhealthy foods – as well as limiting states interest and capacity for innovation, which will be critical in the large-scale reform of food system policy that these guidelines indicate.

It is therefore essential to find a proper modality for the CFS to provide its legitimate input from the viewpoint of its mandate (the progressive realization of the Right to Food) while respective the legitimate boundaries of these intergovernmental processes. Dialogue between different institutions is indeed a critical pillar of policy coherence and the Guidelines could offer a valuable contribution in this respect.

**The CSM therefore proposes to add a separate section on Policy Coherence devoted to this particular purpose, in full respect of the mandate of the institutions and negotiations to which the CFS input is being directed;**

## Stefanie McNerney, Humane Society International, United States of America

Please find attached the contribution from Humane Society International on the Zero Draft of the Voluntary Guidelines on Food Security and Nutrition. We appreciate the opportunity to comment on this draft!

Best regards,

Stefanie McNerney

**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?**

Climate change is a growing threat to food security, a fact acknowledged in the 2019 State of Food Security and Nutrition in the World Report: “Climate change and increasing climate variability and extremes are affecting agricultural productivity, food production and natural resources, with impacts on food systems and rural livelihoods, including a decline in the number of farmers.”[[116]](#footnote-116) Climate change and food and agriculture are interconnected across environmental, social and economic dimensions. These connections across sectors are nonlinear—while climate change has a proven impact on agriculture and food security (compromising food availability, food access, food utilization, food stability and food safety as well as crop yields, etc., as outlined in the FAO Strategy on Climate Change report), the agricultural sector exacerbates climate change and has an inordinate negative environmental impact.[[117]](#footnote-117) Thus, in order to address the current situation of malnutrition and its related causes and impacts, climate change must be featured more prominently than it currently is in the Zero Draft. Rather than adopting a reactive approach to climate change that encourages “climate change adaptation and mitigation”, the Zero Draft must adopt a proactive approach by addressing the related causes and drivers of climate change.

The animal agriculture sector in particular has an inordinate impact on the environment. It is the single largest anthropogenic user of land, with far-reaching effects on climate, soil degradation, biodiversity, air pollution and water scarcity. One of animal agriculture’s largest environmental impacts, however, is its contribution to climate change. The production of meat, eggs, and milk releases greenhouse gases into the atmosphere with devastating consequences for ecosystem health.[[118]](#footnote-118) FAO’s Global Livestock Environmental Assessment Model 2.0 noted, “Livestock supply chains emitted an estimated total of 8.1 gigatonnes CO2-eq in 2010”, which translates to emitting approximately 16% of the world’s total anthropogenic greenhouse gas emissions.[[119]](#footnote-119) Based on projected demand, the GHG emissions for the animal agriculture sector are predicted to increase by 39 percent between 2000 and 2050, a number which would likely reach or overshoot several sustainability thresholds. An increasing amount of research around the world is showing that consumption changes, particularly relating to global meat consumption, are necessary to mitigate climate change and meet the Sustainable Development Goals outlined in the 2030 Agenda.[[120]](#footnote-120),[[121]](#footnote-121),[[122]](#footnote-122),[[123]](#footnote-123),[[124]](#footnote-124) The recently released Special Report on Climate Change by the Intergovernmental Panel on Climate Change (IPCC) includes “a shift towards plant-based diets” in its recommendations of mitigation response options for reducing Agriculture, Forestry and Other Land Use (AFOLU) emissions, estimating that a shift to plant-based diets could provide a technical mitigation potential of 0.7 to 8.0 GtCO2e yr-1 and noting that such a shift would simultaneously generate “significant co-benefits in terms of human health.”[[125]](#footnote-125)

The link between animal-product consumption and human health and nutrition and its contribution to malnutrition is overlooked in the Zero Draft. The overconsumption of animal-products has been strongly linked to obesity and overweight, both of which the Zero Draft acknowledges “represent a major risk factor for diet-related non-communicable diseases (NCDs) such as cancer, cardiovascular diseases and diabetes as well as chronic respiratory diseases which are a major concern in all regions of the world.” Addressing malnutrition—and particularly obesity and overweight—therefore necessitates addressing global meat, dairy and egg consumption.

It is also important to acknowledge the caloric inefficiency of current animal agriculture production. Food loss and waste is widely acknowledged as undermining food security, and demand for resource-intensive animal-based products instead of more resource-efficient, equally nutritious plant-based foods further limits food availability. Approximately 83% of the world’s farmland is currently used to produce animal products despite providing only 37% of our protein and 18% of our calories.[[126]](#footnote-126) By transitioning to a food system consisting predominately of plant-based foods, more people could be fed using less land, as noted in section 5.3.4 of the IPCC’s Special Report on Climate Change.[[127]](#footnote-127)

Considering the role animal agriculture plays in exacerbating the effects of climate change and the interlinked impacts on food systems, food security, and human health and nutrition, the Voluntary Guidelines should explicitly address the intensification of the livestock sector and the consumption of animal-based products as core drivers that are currently hindering food systems from delivering healthy diets.

**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?**

As there is a focus on achieving policy coherence and addressing policy fragmentation, we are dismayed to find that animal welfare is not considered in the Zero Draft at all. As the World Organisation for Animal Health (OIE) is the leading multinational standard setting body responsible for improving animal health worldwide, and includes among its objectives the promotion of food safety through “a better guarantee of food of animal origin and to promote animal welfare through a science-based approach”, we suggest that animal welfare be included in among the issues listed as being of key importance to food systems in the interest of achieving policy coherence.[[128]](#footnote-128)

We were surprised that plant-based diets and the need for a shift in current consumption patterns toward plant-based consumption were not included in this version of the draft principles. The International Panel on Climate Change’s (IPCC’s) Special Report on Land and Climate Change notes that: “Consistent evidence indicates that, in general, a dietary pattern that is higher in plant-based foods, such as vegetables, fruits, whole grains, legumes, nuts, and seeds, and lower in animal-based foods, is more health-promoting and associated with lower environmental impact” than the current global average diets.[[129]](#footnote-129) The report further notes that “there is certainly significant overlap between [diets] that are healthier (e.g., via eating more plant-based material and less livestock-based material), and eating the appropriate level of calories.”[[130]](#footnote-130) Therefore, the Voluntary Guidelines should encourage the consumption of plant-based foods over animal-based foods in order to truly promote sustainable and healthy consumption patterns.

Policies to be included:

* Requirements that producers meet animal welfare standards, at minimum, including the internationally accepted standards established by the World Organization for Animal Health (OIE)
* Support and encouragement for the use of certification programs and labeling schemes based and inclusive of animal welfare, animal health, and environmental criteria to allow for greater transparency in the food system and promote animal welfare-friendly and environmentally friendly systems and products
* Promotion of a dietary shift from predominately animal-based diets to predominately plant-based diets
* Eliminating subsidies for products derived from or associated with negative impacts on animal welfare, human safety and health, and environmental destruction for detriment
* Reallocation of funds to supporting the research, development and promotion of healthy, environmentally and welfare-friendly systems and products, including plant-based alternatives to meat, dairy, eggs and fish
* Support for consumer education about the positive impacts of higher animal welfare practices and plant-based diets on the environment, public health, and animal health

**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?**

Food supply chains:

Minimum animal welfare standards should be included in food production systems in such a way that fosters policy coherence by drawing upon the established policy framework provided by the OIE Animal Welfare Standards. In the 2017 OIE Global Animal Welfare Strategy, the OIE notes: “In food production systems, attention to animal welfare can improve productivity, quality, food safety, and economic returns, and therefore contribute to food security and economic prosperity.”[[131]](#footnote-131) In 2016, the Committee on Food Security (CFS) recommended all livestock production systems should “Improve animal welfare delivering on the five freedoms and related OIE standards and principles” and included “supporting voluntary actions in the livestock sector to improve animal welfare” as one such method of doing so. The CFS also included in its recommendations the promotion of physical environments that “ensures compliance with the OIE welfare standards, including the Five Freedoms”[[132]](#footnote-132). These policy recommendations should be incorporated into the CFS Voluntary Guidelines on Food Systems and Nutrition, as doing so would further foster policy coherence.

Our recommendations include:

Under Food Supply Chains – 1-Production Systems – Policy Relevant Area – h): including the “alternative protein sector” as one to foster investment in research and innovation for commercial development. As noted by the World Economic Forum, “different types of alternative protein can substantially reduce greenhouse-gas emissions and can contribute to a reduction in diet-related mortality” and notes that accelerating investment into alternative proteins is a critical step to achieve this.[[133]](#footnote-133)

Under Food Supply Chains -- 2-Handling, Storage and Distribution -- Policy Relevant Area -- **a):** acknowledging the link between poor animal welfare and handling conditions during the transport and slaughter of animals raised for food and the amount of meat that is wasted due to spoilage. The FAO notes that “Poor transportation can have serious deleterious effects on the welfare of livestock and can lead to significant loss of quality and production.”[[134]](#footnote-134) The various stresses experienced by animals during handling, transport, stunning and pre-slaughter conditions negatively impact meat quality, rendering it unusable and unsellable. Examples include Pale Soft Exudative meat in pigs and Dark Firm and Dry meat in cattle, sheep, pigs and turkeys, as well as spoilage, bruising and injuries.[[135]](#footnote-135) High animal welfare standards must be implemented and maintained in order to prevent this food waste.

Under Food Supply Chains -- 4-Retails and Markets: acknowledging the growing role that higher animal welfare plays in both consumer demand and, as a result, in retailers’ choice of products. An increasing number of companies around the world are adopting animal welfare standards into their procurement policy in response to consumer demand. The 2016 report from the High Level Panel of Experts on food security and nutrition reflects this growing trend: “Retailers are increasingly demanding production systems that take into consideration animal welfare.”[[136]](#footnote-136)

Food environments:

Under Food Environments – 1-Availability and Physical Access – Policy Relevant Area – b): We suggest the nutrition standards and food procurement policies mentioned in this section include a focus on plant-based foods, as recommended in the World Health Organization’s health guidelines: “A healthy diet that has a lower environmental impact includes a wide variety of foods – with an emphasis on plant-based foods…”[[137]](#footnote-137)

Under Food Environments -- 2-Economic Access -- Policy Relevant Area -- **b)**: We suggest recommending additional taxes and user fees be imposed on resource-intensive and/or environmentally damaging foods and on those that have proven negative social and health impacts, taking into account the national and local contexts. Researchers from the International Food Policy Resource Institute (IFPRI) and the Oxford Martin School modeled the potential consequences and tradeoffs of levying carbon taxes on food and found that taxes on such foods could reduce consumption and therefore carbon emissions, while also creating positive health impacts by reducing overconsumption of foods and thereby reducing the risk of obesity and diet-related NCDs.[[138]](#footnote-138) Concurrently, we also suggest recommending that existing subsidies for such foods be eliminated and redirected towards more resource-efficient, environmentally-friendly and healthy foods. A 2016 WHO report found “strong evidence that subsidies for fresh fruits and vegetables that reduce prices by 10–30% are effective in increasing fruit and vegetable consumption” and “Vulnerable populations, including low-income consumers, are most price-responsive and, in terms of health, benefit most from changes in the relative prices...”[[139]](#footnote-139)

Under Food Environments-- 4-Food Quality and Safety -- Policy Relevant Area -- **a)**: The OIE animal health and welfare standards should be referenced when considering measures to recommend in order to improve food safety. The current practice of using antibiotics on farms prophylactically has been linked to antimicrobial resistance, and recommendations to curb the prophylactic use of antibiotics include increasing natural immunity through better housing conditions, improved animal welfare, and more hygienic practices. Small-scale, agroecological systems that respect animal welfare provide animals with the ability to express their natural behaviors, do not expose them to the stresses of overcrowding and large group sizes, and strengthen animals’ natural immunity without requiring medication.[[140]](#footnote-140)

Consumer Behavior:

Under Consumer Behavior – 1-Food and Nutrition Education and Information – Policy Relevant Area – c): We suggest that food and nutrition education should include a fair presentation of the negative consequences certain production systems have on the environment, as well as the negative impacts that overconsumption of animal-based foods can have on human health, as compared to plant-based alternatives, in order to allow consumers to make informed decisions. Information should also be included about the positive benefits of plant-based diets to human health and to the environment.

Under Consumer Behavior – 1-Food and Nutrition Education and Information – Policy Relevant Areas: We suggest including the importance of labeling and animal welfare certifications to further educate consumers on the origin of their food. Such labeling and certification measures can assist consumers in identifying healthier, more sustainably raised foods.

Under Consumer Behavior – 2-Social Norms, Values and Traditions – Policy Relevant Areas – a) and b): The export of the Western diet across the globe has and is shifting traditional diets toward unhealthy and unsustainable dietary patterns. This needs to be addressed due to the harmful impacts the Western diet has on the environment, human health, and the diversity and maintenance of traditional food cultures.

**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 policy-making?**

The ideal food system is one that can support the needs of our present population without compromising the needs of future generations. In order to achieve this, a food system is needed that would reduce food loss and waste by maximizing resource-efficient, nutritious plant-based food production that ensures sustainable land-use, minimizes GHG emissions, and otherwise protects the environment and animal welfare.

Targets/metrics to guide policy-making include:

* Calculating the percentage of land used for animal agriculture, with specific inclusion of farm animals feed crops, and comparing it to the percentage of total protein and calorie input/output
* Metrics evaluating resource input for calorie output
* Metrics evaluating greenhouse gas emissions per calorie, with a comparison between plant and animal based calories
* Food affordability and accessibility metrics, which consider desired outcomes (healthy, low-emission, sustainable diets) and market distortions such as subsidies and taxes, as these can make undesirable foods artificially affordable.
* Animal health and welfare metrics, such as the policies and the implementation of animal welfare standards based on the OIE as well as the use of resources such as the [Animal Protection Index](https://api.worldanimalprotection.org/), which ranks countries based on their commitment to animal protection.

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

Once endorsed by the CFS, these voluntary guidelines can provide a framework that addresses food security on a holistic level and provide national governments with a tool to address food insecurity, directing them to the root causes and drivers of the issue and providing guidance on aid policies, priorities and strategies.

## Aftab Khan, International Consultant and founder of crvoices.com, Pakistan

1. In Chapter No. 1 it is important to mention loss of nutrition in food itself. Research in the US and Great Britain has revealed that the nutrition of fruits and vegetables has declined drastically in the last fifty years. Average calcium content declined 19 percent; iron 22 percent; and potassium 14 percent. Today one would have to eat eight oranges to derive the same amount of Vitamin A as our grandparents would have gotten from one orange.

2. In Chapter 2 under guiding principles the Voluntary Guidelines should include the correcting mechanism of pricing patterns in favour of healthy foods. According to a survey by World Bank International Comparison Program conducted in 176 countries for  657 food products, unhealthy foods are much cheaper than healthy foods in poor countries. Hence unhealthy calories are easy preference for poor communities. And these poor diets are considered as the No. 1 risk factor in the global burden of disease.

3. Paragraph 41 should add policy measures to correct patterns in favour of healthy foods and against unhealthy foods. This could be done by imposing taxes on unhealthy foods and markets corrections for healthy foods.

4. For policy measures it is also important to include research and analysis of existing nutrients in healthy foods (related to the point 1 mentioned above). Additionally, rural women and  women farmers are deficient in various nutrients despite their significant contribution in food production.  Policy measure should include targeting rural women and women farmers for improving their level of nutrition.

5, Voluntary Guidelines should rolled out for communities, CSOs, government and private sector through organized and concerted programs.

## [Andrea Sonntag](http://www.fao.org/fsnforum/member/andrea-sonntag), Welthungerhilfe, Germany

Dear CFS colleagues,

Thank you for the opportunity to comment on the Zero Draft of the Voluntary Guidelines on Food Systems and Nutrition. Please find my comments on behalf of Welthungerhilfe attached.

Kind regards,

Andrea Sonntag

**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?**

* The introductory chapter should clearly contextualize the Guidelines in a human rights framework and particularly the Right to Adequate Food. It´s progressive realization is in the mandate of the CFS and should be the final aim of a transition towards healthy and sustainable food systems.
* Chapter 1 should also locate the Guidelines in the context of other CFS policy instruments, such as the VGGT and RAI, the recommendations on Connecting Smallholders to Markets, and on the Roles for Livestock for Sustainable Agricultural Development for Food Security and Nutrition. Reference should also be made to relevant UN instruments such as the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas and The United Nations Declaration on the Rights of Indigenous Peoples.
* The Guidelines should put equal emphasis on health, sustainability and social equity as requirements that should be met by food systems.
* Regarding the causes of the current situation of malnutrition, particularly its basic causes (para 6), chapter 1 is still rather weak. Explicit reference should be made to inequality in various forms and to power asymmetries. Food systems dysfunctionalities rooted in inequalities and power asymmetries between actors in the food system and their negative impacts on human and planetary health should be addressed and backed by latest evidence (e.g. the IPCC report on Climate Change and Land, the Lancet report on the Global Syndemic of Obesity, Undernutrition, and Climate Change etc.)

**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?**

* Stronger reference should be made to the Human Rights as guiding principles and particularly the realization of the right to adequate food (the full definition should be provided as to General Comment No. 12 of the United Nations Committee on Economic, Social and Cultural Rights). The interrelatedness and indivisibility of human rights needs to be considered, e.g. the right to health can´t be realized in isolation from the realization of women’s rights or the right to food. Human rights principles such as nondiscrimination, participation and accountability to equally be included as guiding principles.
* Social equity should be included as a guiding principle. Any policy measure towards the transition of food system should be effective for the most vulnerable groups.
* Under an evidenced-based approach, evidence that has been co-created between researchers and local communities should be explicitly mentioned.
* Diets should not be defined with regard to health, but with equal weight with regard to their sustainability. The following definition proposed by the CSM should be used “*Healthy and sustainable diets are diets that are balanced and varied, and provide the nutrients required to live a healthy and active life for both present and future generations. They are composed of locally produced fresh and seasonal food, wherever possible, and contain a high proportion of foods that are not or only minimally processed. Healthy and sustainable diets are based on production modes that function in harmony with nature and its species, preserve and promote biodiversity, consciously use limited natural resources, respect peasants’ and workers’ rights and guarantee their livelihoods, while contributing to overall social justice. They are diets adjusted to the personal needs of individuals (personal characteristics and circumstances), the local context, and cultural and other preferences. Beyond the combination and nutritional content of food, the way food is prepared and consumed are key determinants for a diet to be healthy. A healthy diet also presumes the safety of food in a sense that such must be free from substances potentially harmful to those who produce and consume it. Breastfeeding is an essential component of health and sustainable diets*.”

**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 policy entry points should make reference to the requirements to food systems to contribute to health and wellbeing, to planetary health/sustainability and to social equity.
* “Governance” needs to be added as an essential pillar of food systems and entry point. In chapter 1, reference is made to the different policy fields relevant for a transformation of food systems towards healthy, sustainable and socially just diets as well as to policy fragmentation and policy incoherence. However, tensions and contradictions in food systems (e.g. between agricultural practices, trade rules and nutrition) should be spelled out. Only then could policy entry points and decisions that need to be taken be identified.
* Another dimension left out in Chapter 3 is “culture”. The production, sharing, consumption of food is deeply rooted in culture and collective processes are crucial for the transformation of food systems.

**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 tradeoffs 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?**

* The “ideal” food system is a food system that promotes people’s health and well-being, preserves and contributes to the regeneration of nature and biodiversity, 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.
* With regard to targets and metric that should guide policy-making, the Guidelines should recommend to acknowledge the externalities of our food systems or ‘real costs’ of our food. They should suggest a holistic set of new indicators for healthy, sustainable, and socially just food systems. This includes moving away from yield/hectare and productivity/worker and income as main indicators for food systems towards their contribution to nutrient production and availability, resource efficiency, ecosystem services, resilient livelihoods and social equity. Reports such as “The Economics of Ecosystems and Biodiversity (TEEB) (2018). Measuring what matters in agriculture and food systems”, and the reports by iPES food provide guidance on new indicators.

**5. How would these Voluntary Guidelines be most useful for different stakeholders**

**especially at national and regional levels, once endorsed by CFS?**

* The guidelines should show pathways on how they can be put into practice.
* The Guidelines should suggest clear mechanisms for monitoring its implementation and accountability a) at country level and b) at international level.
* Implementation and monitoring of the guidelines should put people at the center, particularly those most vulnerable to food and nutrition insecurity. The effectiveness of food system transformations need to be assessed in positive changes for these populations and planetary health.
* As part of the monitoring and accountability mechanism, the guideline should recommend the realization of human rights assessment of policies prior to its implementation and to measure their impacts.
* The guidelines should clearly distinguish between different actors and their roles and responsibilities. States have the primary responsibility for implementing the Guidelines and leading the transition towards healthy and sustainable food systems. States should put in place the necessary frameworks to facilitate meaningful participation of rights holders (particularly those groups most affected by hunger and malnutrition) in defining the priorities of public policies regarding food systems transformation.
* In this regard, the Guidelines should recommend the adoption of robust safeguards against conflict of interest to ensure that public policies serve the public interests of health and sustainable future and are oriented towards the fulfillment of human rights.
* The Guidelines should clearly stipulate policy incoherences and blockages in the process of transformation towards healthy and sustainable food systems. They should contribute to a better understanding on who potential winners and losers from policy changes are.
* Measures to strengthen cross-sectoral collaboration and policy coherence should be suggested. Examples should be provided for a systemic approach to the transition of food systems (e.g. information and education campaigns need to be assisted by changes in policies, regulations, standards to achieve sustainable change).

## Lynn Brown, United States of America

**CFS voluntary guidelines on food systems comments**

Question 1 – does chapter 1 adequately reflect the current situation

I do not believe that the current chapter 1 adequately reflects the critical nature of micronutrient malnutrition. Currently paragraphs 2, 3 and 4 each highlight undernutrition, micronutrient malnutrition and overweight/obesity. But the reality is that micronutrient malnutrition dwarfs the other two in terms of population numbers in that is co exists with both undernutrition and overweight/obesity and also in those with ‘normal weights’. The fact that it is hidden means it is often overlooked and its impacts are severe, especially for young children and women. So micronutrient malnutrition deserves a broader coverage than it currently receives given micronutrients are a critical component of a healthy diet. In fact children aged 6-24 months require more nutrients per pound of bodyweight than at any other time in their lives, and given their small stomachs, require high nutrient density diets.

It would be good to discuss the key micronutrient deficiencies and the impact that these deficiencies have.

2. Guiding Principles

While I agree with the principles listed I miss a reference to the critical role of agriculture in terms of raw material supply within the food system. While industrial fortification for micronutrients is clearly viable surely it is preferable and more sustainable for agriculture to supply a diversified raw material base in terms of nutrients. Given staple grains are a core part of a diversified food system growing more nutritious varieties of those crops is critical. This brings in the role of crop breeding – both genetic engineering/transgenic as well as conventional crop breeding – to increase the availability of biofortified crops, staple crops with higher levels of nutrients. These biofortified crops can reduce the need for industrial fortification or supplements.

In some countries transgenic varieties of crops such as maize are already available but the transgenic element, that not normally found in the crop, is usually with respect to pest/disease resistance. Surely where transgenic crops are acceptable then exploiting the technology to include higher levels of existing nutrient content or inclusion of a missing nutrient, such as vitamin A in Golden Rice, should be pursued.

However, in food systems where transgenic raw materials are precluded, conventional breeding, by CGIAR centers in conjunction with HarvestPlus, has already produced higher nutrient biofortified varieties of many crops by exploiting the natural variation in nutrient content between varieties of the same crop. The nutrient content can vary markedly among different varieties of the same crop. For example, aromatic rices normally have higher iron and zinc content than non aromatic varieties. By protecting biodiversity and genetic variation we preserve these nutrient variations as well leveraging our ability to breed more nutritious crop varieties than those traditionally grown with combined agronomic advantages.

Examples include higher zinc rice and wheat, higher Vitamin A maize, cassava, sweet potato, higher iron beans and pearl millet. These conventionally bred crops are not only biofortified but agronomically competitive – farmers don’t grow for nutritious traits they grow for productivity. These biofortified crops are already so successful that the leaders in breeding and policy development, from CIP and IFPRI, were awarded the World Food Prize. Relegating them to R and D (h) under production systems therefore seems inadequate.

But in summary, a guiding principle should be that the agricultural sector grows the most nutritious varieties of a crop available for the prevailing agronomic conditions, and the R and D pipeline focuses on increasing the availability of these crops. This requires a change in mindset for crop breeders, requiring examination of nutrient profiles when they are selecting crop varieties for preferred traits, such as drought tolerance, and to ensure that the new varieties have at least as high a level of key nutrients as the variety they are designed to replace but preferably more. This is critical going forward as evidence indicates that climate change may well reduce nutrient levels in some crops and agronomic conditions.

3. Policy Entry Points

It is disappointing that at the moment the only recognition of biofortified crops in the whole document, is under production systems section h). While further research and development on biofortified crops is important to both increase current nutrient levels and broaden the portfolio of crops, conventionally bred biofortified crops already available, are consumed by 40 million people, and are already part of food systems.

In Mozambique bakers replace part of the wheat flour when making bread and the resulting small bread buns have all the vitamin A a child under 5 requires daily. In Malawi Bakers Pride Bakeries as using orange flesh sweet potato puree in bread making to incorporate vitamin A in bread. In Rwanda high iron beans are available in supermarkets. In the Democratic Republic of the Congo a new World Bank supported programme with government will disseminate high iron beans, and vitamin A maize, cassava and sweet potato to 99,000 farmers in the next 5 years.

These crops also have significant advantages for women, g) in production systems. Many of them are primary crops for women, like beans, cassava and orange flesh sweet potato, and give women both productivity benefits and nutrition benefits. High iron beans in DRC require 2 hours less cooking time – critical in a context where women and girls spend many hours collecting firewood and are exposed to smoke while cooking. In Uganda women received orange flesh sweet potato vines through community nutrition meetings. Their production was so successful their husbands gave them additional land to cultivate without taking the profits.

Vitamin A maize offers a potential advantage to women given varieties higher in Vitamin appear to be less susceptible to fungal contamination and the development of aflatoxins. This is critical for women who often struggle to dry their crop adequately, increasing aflatoxin development which negatively impacts on child growth and at high levels can result in morbidity and mortality.

Finally, climate change i) is not just about decreased output but also potentially decreased nutrient levels in crops which are produced. This makes it a critical part of adaptation that we scale up the dissemination of biofortified crops in food systems to reduce the impact of nutrient losses. Additionally, climate change is likely to increase aflatoxin contamination in many maize areas where undernutrition is already prevalent. Combatting this with biofortified varieties higher in vitamin A is an important part of adaptation.

## ****Audrey Pomier Flobinus,**** Humanity For The World (HFTW), France

My dear colleagues, please find attached my contribution, with the following answers :

**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?**

Chapter 1 reports on the current situation of malnutrition and related causes and impacts, but it does not sufficiently emphasize the relationship between the effects of climate change and the agricultural situation of a climate-affected country. in particular, global warming, which leads to the scarcity of water points, and which has direct effects on agricultural production and which generates effects of malnutrition and / or undernutrition on populations unable to move on territories affected by climatic effects .

The report also does not insist on the need to adapt agricultural production according to regions, countries, the environmental context in general, for example, poor agricultural production can lead to soil depletion in water , essential element for developing agricultural production

**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?**

Overall, the established guiding principles are consistent with the predefined direction, however, it is important to democratize and popularize information. To do this, the promotion of the sustainable food system will absolutely have to go through the filter of social networks, if it wishes to impact a maximum of people; The aim is to reach the masses and thus accelerate another level of international awareness, which should be followed by mass actions to improve nutrition in all latitudes.

Many countries affected by malnutrition / and / or undernutrition, are paradoxically hyper-connected, it is to seize this asset to establish a campaign of international communication of shock.

This new approach should be the subject of a reflection on the communication strategy through the establishment of a guiding principle for the promotion of sustainable food systems: Digitization of the world implies the establishment of networks of positive influences to achieve the Sustainable Development Goals (SDGs) by 2030.

Example guiding principle: "Strategy and communication for the promotion of sustainable food systems"

**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?**

Given the policy areas identified in Chapter 3 and the enabling factors suggested in paragraph 41 of the draft, the political entry points that should be addressed in Chapter 3 relate to information management. the harmonization between agrarian practices and economic, social and humanitarian development must be ensured. It is necessary to concern the autochthonous people in the definition of the agricultural public policies which often have ancestral agrarian practices in accordance with the environmental context. For example, to promote the specific crop according to the seasons of each country and not according to the economic pressure related to a neutral international consumption system.

**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 policy-making**

In terms of national public policy, the French government has taken the firm resolve to remove all pesticides from the market to promote the development of a healthier agriculture and thus limit the effects of endocrine disrupters and other health on the French population .

In Martinique, banana producers had to find biological palliatives to protect their production against insects and to continue their agricultural production activities. For example, aerial application of banol (insecticide) was suppressed, along with this event, a farmer found that the product resulting from the decomposition of banana trunks had an insecticidal effect.

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

These voluntary guidelines will be useful if they are shared and sensitized to national and regional stakeholders; To do this, it is necessary to put in place means of communication strategies that will aim at informing about the advantages of adopting new methods.

He develop a fund dedicated to this strategy, which should not be taken lightly.

Dr.h.c Audrey POMIER FLOBINUS

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## [Marlen Schuepbach](http://www.fao.org/fsnforum/member/marlen-schuepbach-0)****,**** Scaling Up Nutrition (SUN) Movement, Switzerland

I am submitting the contribution from the Scaling Up Nutrition (SUN) Movement Global Support System to the consultation on the zero draft of the CFS Voluntary Guidelines on Food Systems and Nutrition.

Thanks very much for the opportunity to comment on the draft.

**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?**

Chapter 1 captures the key issues of the current nutrition situation but how it relates to food systems challenges does not stand out. The following elements could be further emphasized in this description:

*On the description of nutrition problems*

* Do not limit MDDs to iron (vit A – there is evidence of a reduction in coverage of Vit A supplementation; we need to continue on iodine; zinc and folate are important too…). The text can also elaborate on the consequences of iron deficiency (i.e. decreased productivity, negative birth outcomes) and add adolescent girls to the populations being particularly affected by iron deficiency anaemia.
* Diabetes as a diet-related problem in itself, even without overweight and obesity.
* When presenting prevalence of malnutrition, it will be worth noting where the prevalence has gone down but the absolute numbers are going up due to demographic growth
* The co-existence of different forms of malnutrition within the same country (this is briefly done in paragraph 1), households and even individuals should be acknowledged. The guidelines might draw upon some of the findings disclosed in the 2018 Global Nutrition Report, such as:

· 88% of countries have high levels of two or more forms of malnutrition

· 15.95 million children are wasted AND stunted

· 8.23 million children are affected by stunting AND overweight

* Paragraph 2 could note that children who suffer from stunting are more susceptible to becoming overweight or obesity later in life, and thus that undernutrition and ‘overnutrition’ are part of the same problem. This situation of which puts them at risk of contracting NCDs and in turn, increases health costs and the burden on national health systems, many of which are already overstretched and underfunded (linked to paragraphs 4 & 5). This will buttress the point that effective, coherent and multi-sectoral policy actions to combat malnutrition will reduce future costs both to the lives and economies of countries.

*On the causes of malnutrition*

* The **environmental dimension** of food systems challenges can be further emphasized, in particular: the impact of biodiversity loss on diets; the impacts of climate change on food production and other causes of malnutrition; the demographic pressure on limited natural resources; the role of certain food production/harvesting systems on food sources (e.g. overfishing associated with industrial fishing; intensive production of livestock, but also plantations such as palms, bananas, soil health considering micronutrient content of soil, etc.); the tension between biofuels and food crops. Indeed, we were surprised to see that addressing environmental challenges is not emphasized along with food, ag and health sectors.
* Dynamics in food systems that contribute to structural causes of malnutrition, in particular **inequity and poverty**: e.g. challenges in access to land and other productive resources (e.g. violation of land rights of indigenous peoples); over-exploitation of natural resources by industry; indecent rural employment; etc.
* Impact of **food policies** on the types of food that are produced, processed and sold (e.g. agricultural policies that lead to loss of biodiversity)
* **Private sector strategies** (incl. Processing, marketing and retailing) that encourage unhealthy diets. In that regard, the political economy that underlies dynamics in food systems (e.g. private sector influence over public policies) can also be mentioned.
* Within the context of overweight and obesity, **changing lifestyles** thanks to urbanization, technologies and modernization are changing consumption patterns and creating consumer demand for convenience foods that are often processed and unhealthy.
* The speed and implications of **demographic growth**, esp. in sub-Saharan Africa (increasing number of people to feed, but also pressure on all basic social services such as schools and health services) – these can undermine progress that has been achieved in addressing underlying and basic causes of malnutrition
* The role of **gender dynamics** in determining the nutrition situation should be underlined. This is in terms of women’s access to productive resources and income (i.e. extensive evidence that when women control income it is used more for family health, nutrition and education), but also in terms of the links between women’s education and nutrition outcomes, and the impact of early marriage, teenage pregnancies and high fertility on women’s and children’s nutrition and health (and on demographic growth).
* Paragraph 6, in particular should include gender inequality among the list of causes that need to be addressed simultaneously. Gender inequality lies at the heart of many development and humanitarian challenges and should be considered as central in the fight against malnutrition.
* Paragraph 20 might also include reference to women empowerment at the beginning.

Note: some of these issues are well captured in the later section of the guidelines. Presenting what the problems are in this chapter will help increase buy-in and support for the recommendations in the later sections.

* Paragraph 15: Perhaps there is also scope to include mention of the SUN Movement as it speaks to the renewed interest and increased attention that nutrition is receiving from the global community, including the UN and Member States.
* Paragraph 26: The VGs can also inform nutrition and food systems advocacy and being used by the media and other groups such as chefs, that can be leveraged to support nutrition-smart food systems.

**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?**

In the introduction of the principles, the concept of “healthy diets” should be expanded to “**healthy *and sustainable* diets**” covering all dimensions of sustainability (environmental, health and economic). (In many situations, there can be tensions and event trade-offs between healthiness and sustainability.)

The following principles should also be considered:

* **Equity and “leaving no one behind”** (as per the philosophy of Agenda 2030), including by addressing sources of inequity, power imbalances and social injustice. This could include reference to the food security and nutrition challenges faced by Indigenous peoples (Note: Indigenous peoples should be included in the list of stakeholders in para.26). It might also be worth adding the principles **inclusiveness/participation**.
* **A people-centered approach**, where individuals and communities’ needs are addressed through a holistic rather than siloed approach (the focus on a people-centered approach could be integrated / at the center of current point “a”)
* The importance of **action at the local level**, adapted to local needs, priorities, agro-ecological systems, and cultures, and which builds upon indigenous and traditional forms of knowledge. The need/value of efforts to safeguard traditional diets, including the consumption of underutilized species, that are nutritious and sustainable should also be mentioned.
* The importance of a **multi-stakeholder and multi-sectoral approach**, including effective public-private partnerships implemented in respect for the principles listed in Chapter 2 (see also point below on paragraph 36g). This should be associated with an emphasis on the importance of **government ownership and leadership**.

The following principles can be enriched / amended in the following ways:

* **Paragraph 36a** (systemic and holistic evidence-based approach):
* **‘Resilience’** should be integrated under this principle. With increasing situations of extreme climatic conditions, natural disasters, and man-made conflicts, there is a need to promote policies that consider the resilience of food security and nutrition actions and also protect the positive nutrition outcomes already attained.
* we also suggest saying ‘multidimensional and ***interconnected*** causes of malnutrition…” as that interconnected piece is key to both nutrition and food systems.
* **Paragraph 36d** on **gender equality** can be buttressed by elaborating on the importance of **involving women and girls in local food and nutrition programming and decision-making**, including efforts to address the cycle of malnutrition.
* **Paragraph 36f** on realization of the **Right to Food** should be broadened to **human rights-based approach**, with special focus on the Right to Food and access to land and productive resources.
* **Paragraph 36g**: capacity building is not a principle but an activity. We would suggest to change the name of the principle to “**empowerment**”. In this paragraph, 2 elements can also be added:
* the importance of ‘**adequate and innovative financing for nutrition’**. Several countries have established various nutrition-sensitive and specific policies which have failed to benefit from substantive implementation owing to the lack of clearly earmarked and/or adequate funds within national budgets.
* The importance of **strengthening coordination capacity** and nutrition coordination mechanisms/platforms that can be leveraged to foster policy coherence and coordinated action.

We suggest to take out the principle on nutrition knowledge and awareness as this is more an action than a principle. It can be emphasized in the section on recommended actions.

The [SUN Movement principles](https://scalingupnutrition.org/about-sun/the-vision-and-principles-of-sun/) can be a source of inspiration for these guidelines.

**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 entry points described in this chapter are comprehensive, however, the way they are presented as isolated areas of action risks undermining the systemic approach needed to ensure food systems provide healthy and sustainable diets. While individual actions can be listed, it is important to make it clear they should be part of a coherent set of mutually reinforcing policies. The concept of “**policy coherence**” can thus be put forward, looking at how policies create incentives (or disincentives) for the production, processing, marketing and consumption of healthy and sustainable diets by the various types of stakeholders involved. The guidelines could mention tactics and mechanisms (e.g. nutrition coordination platforms) that can be leveraged to foster coherent policies across different sectors from agriculture to health to gender, industry and commerce, social protection, education, etc.

We also recommend that the guidelines consider positioning food systems as part of a greater systems (health, education, social protection, etc.) approach to underscore the systems angle and importance of addressing multiple causes of malnutrition.

In terms of individual actions, the following could also be considered:

* Under food supply chains, specific attention could be given to the role of local Small and Medium Enterprises who can play a unique role in dynamising the local economy and make nutritious foods accessible (c.f. FAO/GAIN report “Leveraging SMEs to improve nutrition:<http://www.fao.org/3/CA2880EN/ca2880en.pdf>)
* Paragraph 45a, we suggest that the recommendation not specifically speak to adding micronutrients, i.e. fortification, during processing, which raises concerns about the types of foods being fortified, but instead to speak to the nutritional quality of the food overall.  Please consider instead revising the statement to: “Policies, programmes and approaches can be put in place to preserve or add micronutrients into foods enhance the nutritional profile of food during processing…”
* Under food environment / physical access: the role of market development (ie supporting market facilities in rural areas) and transport is key

The national Food-based Dietary Guidelines are currently positioned as a tool for consumer behavior. This would continue restricting their use for this purpose whereas they can be instrumental in influencing many of the other entry points, including agriculture production policies, marketing regulations, food assistance programs, schools meals, etc.. In brief, FBDGs could be empowered to be a key national guiding document for the application of the voluntary guidelines as a whole. It could thus be worth presenting them separately as a more holistic tool.

Schools can be highlighted as a strategic entry point / location for influencing various components of the food system in favour of healthy and sustainable diets (production, through the procurement of school meals; and consumption through shaping children’s eating habits and as a source of nutrition education). Furthermore, school-age children are often change agents that can be leveraged to change eating patterns of their families and communities.

The importance of governments and private sector investing in explicit strategies to improve nutrition (whether nutrition-specific or nutrition-sensitive) should be highlighted. We need a purposeful approach to making food systems work for healthy and sustainable diets.

The issue of decent employment along the entire food chain is also very important, including (but not limited to) the topic of nutrition in the workplace.

A running question / theme for all of these entry points is: how do we create the incentives for food supplies and consumers to adopt the healthy and environmentally-friendly behaviors. How do we convince / constrain these private actors to change behaviors. This should probably be addressed for each entry point but can also be the topic of a specific section, probably under Chapter 4.

The guidelines could also mention the importance of managing conflicts of interest that surround food systems (e.g. private sector strategies that contribute to unhealthy diets and efforts to undermine consumer protection strategies) and point to relevant resources[[141]](#footnote-141).

From a more positive point of view, the guidelines can also seek to demonstrate to private sector stakeholders the advantages of investing in strategies that provide healthy and sustainable diets and include examples of behaviours and strategies that are “win-win” for the private sector, for consumers health and the environment.

‘Trade and Investment’ should be included as one of the nutrition improvement pathways listed in Paragraph 41. Trade policies and agreements affect the availability and affordability of food both in supplying and demanding countries, and thus constitute a major nutrition improvement pathway to be considered in policy-making.

Likewise, paragraph 41 might acknowledge the role of fiscal policy (e.g. taxes on sweetened beverages and/or subsidies on nutritious foods) but see this is included in paragraph 50b as well as that of the media, including social media in influencing/reshaping food systems from production to consumer behaviour.

Perhaps targeted weather-based insurance for crops/livestock insurance to safeguard healthy diets/good nutrition can be integrated into paragraph 43i. on climate change adaptation and mitigation.

**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 policy-making?**

The following initiatives / alliances can be mentioned (In addition to SUN which is already mentioned in the text) :

**Multi-stakeholder initiatives:**

* the Food Systems dialogues,
* the EAT Foundation and Forum, and actions building on the [EAT-Lancet Report](https://eatforum.org/eat-lancet-commission/eat-lancet-commission-summary-report/)
* Food Waste Reduction Alliance

**Stakeholder initiatives**

* Role of champions such as the former First Lady of the United States, Michelle Obama.
* Youth engagement
* Chefs, such as through the [SDG2 Chef’s Manifesto 2020FOR2020](http://www.sdg2advocacyhub.org/chefmanifesto). Using chefs as entry points that are familiar with cultural aspects of food and consumer preferences and also gaining fame (e.g. through cooking shows) can help make healthy and sustainable eating trendy. Cocina Con Causa is a TV show in Peru that WFP is supporting to prompt behaviour change for positive nutrition outcomes.
* GAIN Marketplace for Nutritious Foods…

**Country examples**

* The Philippines tax on sweetened beverages enacted on 19 December 2017. Additional information available [here](https://www.who.int/bulletin/volumes/97/2/18-220459.pdf). The tax has increased the price of sweetened beverages which has in turn contributed to declining sales of these drinks. As a result, the tax scheme is promoting public health goals while generating government revenue which can, in turn, be utilized for other nutrition-related social programmes.
* Chile is an excellent example of legislation on nutrition labelling and advertising to combat overweight and obesity, which pays close attention to sugar, salt and fat in foods. 68% of people have since changed their eating habits and 20% of industry have changed their food products as a result of this law. The Chile example underscores the importance of symetric information for good markets and nutrition.

**Challenges / constraints / trade-offs:**

* Demographic growth and sustainable production and protection of wildlife and eco-systems (e.g. forests)
* Social appeal of unhealthy foods (e.g. fast food fashion in emerging economies)
* Aggressive marketing strategies of food industry / non-respect of engagements (c.f. Code of marketing of BMS)
* Poor awareness of consumers / lack of organization of consumers making consumer protection more difficult
* Challenge of defining an “ideal” continental/regional/national/sub national/local food system and the linkages between these different levels (territorial boundaries, role of “fair” global trade etc.)
* Promotion of fresh foods versus consumer demand for convenience and food safety concerns
* Decreasing investment in agriculture[[142]](#footnote-142)

**The ideal food system would:**

* Produce food in a way that the vitality and diversity of local ecosystems are preserved and regenerated, and that all life forms (e.g. animals) are treated with dignity
* Mitigate climate change
* Be characterized by diversity: of food species, food preparation, nutrients, cultural variety
* Maximize the consumption of foods produced locally, in season, and contribute to the circular economy
* Provide enough / diverse / healthy / affordable foods for all
* Minimize food losses and waste
* Protect consumers from seasonal gaps (e.g. through adequate processing)
* Be resilient to climatic and political shocks and crises / include measures to respond to food-related crises in a timely and effective manner
* Use packaging materials that are 100% recyclable or biodegradable and minimize packaging (e.g. bulk buying)
* Provide jobs and opportunities for social integration
* Provide spaces for learning, sharing and solidarity amongst individuals as well as celebrating the diversity of the world’s cultures
* Take into account special nutrition needs of adolescent girls, women in reproductive age and small children (“1000 days - window of opportunity”)
* Benefit from sufficient investments from the domestic budget to ensure that food systems deliver healthy and sustainable diets
* Are supported by an enabling government generated through strong government leadership that protects the populations and environments well-being.

Key metrics include:

* Measures of pollution and environmental degradation associated with food systems / measures of sustainable practices and ecosystems regeneration through food systems (e.g. increased coverage of agro-ecology/permaculture/regenerative agriculture; reduced food loss and waste; more efficient use of packaging; reduction in miles travelled by food…)
* Individual food consumption measures that capture diversity, nutrient adequacy, healthiness, safety, and environmental footprint, e.g. Minimum Dietary Diversity Score for women (MDDW), which has the advantage of being a proxy for women’s micronutrient intake.
* Prevalence and trends of all the major forms of malnutrition (c.f. WHO targets), with continued attention to tracking coexistence of different forms of malnutrition and disparities (gender, wealth quintiles, urban/rural populations, etc.).

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

The guidelines would be very useful if they include clear policy guidance recommendations and “how to” sections (or an accompanying manual).

The following can also be considered:

* The guidelines should include, or be accompanied by or refer to, guidance on how to manage complex multi-stakeholder collaboration processes, building on the lessons learnt from experiences such as the SUN Movement and Food Systems dialogue (FSD)
* Use existing alliances and multi-stakeholder processes (SUN, FSD, EAT Forum…) to be disseminated at regional and national levels
* Be accompanied / supported by a sensitization and capacity development process on their use, for example using webinars, MOOCs. This can be supported by partnerships with academic institutions which already run courses on food systems (e.g. Wagenigen, Agreenium…) and through existing partnerships fostered by FAO Capacity Development team. In addition, the guidelines might include a list of complementary resources and guidance materials (e.g. the UN Network’s Compendium of Actions for Nutrition, links to AU/WFP Cost of Hunger studies, WHO eLENA, etc.) to help actors operationalize the principles outlined by the guidelines.
* Be shared widely with private sector entities (including through presentations to board meetings and stock holder associations)
* Be shared widely with CSOs to support their advocacy campaigns and their implementation capacity
* Reference is already made to the establishment & strengthening of multi-stakeholder platforms (MSPs), but the language could be strengthened to include that MSPs (at national level) be charged with the responsibility of monitoring progress and ensuring that actual policy coherence is being achieved in the formulation of new sectoral policies (since that is the end goal of the VGs).
* We appreciate that the document serves as a guidance, but perhaps it could still include some form of accountability mechanism to promote implementation.

## ****Dirección Nacional de Relaciones Económicas Multilaterales, Argentina****

Se envían en adjunto comentarios de la Argentina al Borrador Cero del documento de referencia.

**1. ¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030? ¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?**

Se destaca que el capítulo 1 del Borrador cero detalla adecuadamente la situación actual de todas las formas de malnutrición a nivel mundial, comprendiendo sus causas y consecuencias. Al respecto, se concuerda con su enfoque, el cual se alinea con la visión de las políticas ejecutadas por nuestro país.

En este orden de ideas, tanto en el capítulo 1 como el 2 se abordan las diferentes aristas que contribuyen de manera directa e indirecta hacia el desarrollo de sistemas alimentarios sostenibles, inclusivos y más saludables, contemplando una mirada integral y holística, que incluye la representatividad y la visión de diversos sectores: el de la salud, el de la producción, económicos, comerciales, de investigación, educación, acción social, comunicación, entre otros.

Las Directrices voluntarias serán un instrumento de referencia relevante para acompañar a los países en el abordaje de las problemáticas alimentarias actuales, a través del accionar de políticas intersectoriales y multidisciplinarias que incluyan en su agenda el compromiso en pos del  desarrollo sostenible.

No obstante ello, se entiende que existen barreras y obstáculos que dificultan la acción, principalmente la ausencia de regulaciones efectivas que mejoren el acceso a alimentos saludables. En este sentido, entendemos que políticas basadas en recomendaciones internacionales con debido sustento científico son fundamentales para  combatir la malnutrición en todas sus formas.

Además es central la implementación de políticas integrales, que promuevan tanto el incremento de la disponibilidad y el acceso, como el consumo de alimentos saludables. Entre ellas, podemos destacar políticas para fomentar la agricultura familiar, potenciar el rol de los sistemas actuales de abastecimientos y distribución de alimentos, facilitar la inclusión de la agricultura familiar en las compras públicas, desarrollar la agricultura periurbana y urbana, optimizar las ventajas de los sistemas integrales de protección social y promover la alimentación saludable en los centros educativos.

**2. ¿Cuáles deberían ser los principios rectores para promover sistemas alimentarios sostenibles que mejoren la nutrición y permitan una dieta saludable? ¿Qué opinión le merecen los principios incluidos en el capítulo 2? ¿Son los más apropiados para sus contextos nacionales/regionales?**

Los principios rectores incluidos en el capítulo 2 ayudarían a la promoción de sistemas alimentarios sostenibles, permitiendo dietas saludables, mejorando la nutrición y promoviendo el desarrollo sostenible. Ante los innumerables retos relacionados con la dieta y la malnutrición que se avecinan, resulta necesario contar con una respuesta y entornos propicios, coordinados y multisectoriales para asegurar sistemas alimentarios sostenibles. Ello requiere un estado rector, responsable de la formulación de políticas, en diálogo con todos los sectores y partes interesadas, en particular la sociedad civil, la academia, las organizaciones de consumidores y  los productores, en particular los pequeños. Se debe aprovechar este momento para conseguir que el Decenio de las Naciones Unidas de Acción sobre la Nutrición (2016‐2025) sea significativo, esté orientado a la acción y logre los efectos previstos.

**3. Considerando los ámbitos normativos identificados en el capítulo 3 y los factores propicios sugeridos en el párrafo 41 del borrador cero, ¿cuáles son los primeros pasos normativos que deberían analizarse en el capítulo 3, teniendo en cuenta la necesidad de fomentar la coherencia de las políticas y abordar su fragmentación?**

En vistas de abordar la carga del sobrepeso y la obesidad a escala mundial, en 2016 las Naciones Unidas hicieron suyo el Marco de acción de la CIN2 y proclamaron el Decenio de Acción sobre la Nutrición. Luchar contra todas las formas de malnutrición no es competencia exclusiva de ningún sector, más allá que debiera estar regido por el sector salud. Los sectores de la educación, la agricultura, la protección social, la planificación y las políticas económicas tienen una función que desempeñar, así como los legisladores y otros dirigentes políticos. Se necesita una serie de medidas orientadas a los planos individual, familiar, comunitario, nacional e incluso mundial.

Las escuelas pueden tener un papel influyente al crear entornos que determinen opciones alimentarias más saludables y permitan su introducción mediante la exposición a alimentos nutritivos, al tiempo que se imparte educación sobre nutrición y se evalúan medidas relativas a la venta, publicidad, promoción y patrocinio de alimentos o bebidas con contenidos excesivos de grasas, azúcares y/o sal.

Los gobiernos nacionales disponen de instrumentos normativos para promover la alimentación saludable. Entre ellos se cuentan incentivos para fomentar la producción de frutas y hortalizas, normas alimentarias aplicables a los establecimientos educativos y otras instituciones públicas, regulación y mecanismos de sanción al incumplimiento del Código Internacional de Comercialización de Sucedáneos de la Leche Materna de la OMS y directrices dietéticas o guías basadas en alimentos.

En relación con los sistemas de atención sanitaria, éstos deben proporcionar apoyo, educación y asesoramiento adecuados a las personas y familias con miras a promover la lactancia materna (empezando con políticas favorables en los hospitales) y prevenir y tratar el sobrepeso y la obesidad.

Proporcionar acceso libre a agua segura es crucial para promover la salud en todas partes; poder acceder fácilmente a agua potable que sea inocua en las escuelas ofrece una alternativa saludable al consumo de bebidas azucaradas. Otras medidas importantes en materia de políticas son, por ejemplo, las restricciones a la comercialización de los sucedáneos de la leche materna, la regulación de la comercialización de alimentos y bebidas no alcohólicas dirigida a los niños y las normas para regular los niveles máximos de sal, azúcar y grasas en determinados productos. Los programas de reformulación dirigidos por los gobiernos pueden dar lugar a reducciones en los niveles de sal, azúcar y grasas en todo el espectro de productos alimenticios y bebidas elaborados, incluida la eliminación de las grasas trans de producción industrial.

Sin embargo, cabe señalar que ninguna medida puede por sí misma revertir las tendencias a la malnutrición, sino que debe adoptarse un enfoque multidimensional que combine distintos tipos de políticas e intervenciones. Es, por ello, importante que las áreas de políticas relevantes identificadas en este Capítulo reflejen adecuadamente esa multidimensionalidad y, en particular, aborden de forma equilibrada los tres pilares que constituyen el desarrollo sostenible. Se llama la atención por ejemplo al punto 48.c bajo el cual se hace referencia a “resilient food systems”, mención que podría hacer foco fundamentalmente en la sostenibilidad ambiental, en detrimento de los igualmente importantes pilares social y económico.

Por otra parte, se destaca que en el Capítulo se hace mención a que los mercados locales son una fuente importante de alimentos nutritivos (punto 43.f; 46; 46.b;48.b). Tal redacción podría implicar la promoción de políticas del estilo “compre local” bajo la no comprobada idea de que los productos locales serían más nutritivos que los importados desde mercados más distantes, aseveración que no necesariamente es correcta. Igual comentario se realiza respecto de la mención a “traditional diets” bajo el punto 56.b, en tanto prejuzga negativamente la calidad nutricional de dietas no tradicionales en un determinado lugar.

Adicionalmente, se llama la atención respecto a la mención que se hace bajo el punto 47 sobre el importante rol del sector privado en apoyo a ambientes alimentarios sostenibles y más saludables. Esto así ya que los estándares privados constituyen en muchas ocasiones una dificultad para el logro de la seguridad alimentaria, al obstaculizar sin debida justificación científica el comercio y el acceso a los alimentos. Por ello, y si bien se reconoce el rol del sector privado en el logro de ambientes alimentarios sostenibles y más saludables, se resalta la importancia que su accionar se sujete a los compromisos que han asumido los países en el marco multilateral, particularmente, bajo la Organización Mundial del Comercio (OMC).

Con relación al punto 2 sobre “Economic Access”, es esencial promover    sistemas alimentarios que contribuyan a dietas saludables. Los programas de protección social, particularmente aquellos que realizan entrega de alimentos, como comedores, bolsas o módulos de alimentos, tickets o tarjetas magnéticas para la compra de alimentos, también deben apoyar el acceso a alimentos nutritivos, que llegan especialmente a las poblaciones desfavorecidas. Las comunidades más pobres suelen enfrentarse a obstáculos físicos y económicos para obtener alimentos nutritivos, lo que las expone a un mayor riesgo de sufrir inseguridad alimentaria y malnutrición.

Para mejorar el acceso a dietas saludables, los gobiernos deben implementar una serie de opciones de políticas, que comprenden desde políticas vinculantes, como normas y reglamentos, hasta políticas no vinculantes, como el suministro de información y educación.

Los alimentos nutritivos que contribuyen a una dieta saludable deben ser fáciles de conseguir y asequibles. Con miras a fomentar un mayor acceso físico a alimentos nutritivos, los gobiernos locales pueden adoptar varias medidas, para aumentar el número de puntos de venta de alimentos que ofrezcan alimentos frescos y nutritivos en los barrios y las comunidades (como los mercados al aire libre).

Sin perjuicio de lo anterior, llama la atención la mención bajo el punto 2 (párrafo 49) a que “This challenge would be even greater if prices were to increase to better reflect the true costs of production, including environmental costs of unsustainable practices, and social costs”, así como la referencia a “measures like taxes can regulate pricing to better account for the environmental and social benefits of sustainable production and influence dietary intake and health outcomes” (50.b). Tales referencias presumen que los precios actuales no reflejan correctamente los costos de producción, además de poder implicar el aval a la imposición de medidas en frontera, como por ejemplo impuestos al carbono, como una forma de penalizar “prácticas no sustentables”. Se entiende importante evitar este tipo de menciones que podrían derivar en la aplicación de estándares no acordados a nivel internacional, los cuales en muchos casos llevarían a un incremento injustificado de los costos de los alimentos, dificultando aún más el acceso a los mismos.

En un mismo sentido, y considerando que una de las áreas de políticas relevantes bajo el punto 2 son las políticas comerciales, se recuerda la importancia de asegurar que cualquier medida que se adopte sea compatible con las normas de la OMC, de modo tal que no se conviertan en barreras injustificadas al comercio de alimentos.

Adicionalmente, y con relación al punto  3  “Promoción y publicidad”, se llama la atención respecto a la imposición de enfoques obligatorios con relación al etiquetado frontal. Al respecto se recuerda la centralidad de basar las medidas en los estándares internacionales relevantes.

Bajo el punto 4, “Food quality and safety”, llama la atención la mención que se realiza a los “peligros” (hazards) que pueden contaminar los alimentos. En este sentido, se sugiere reformular la redacción de modo tal de que sea coherente con el lenguaje acordado bajo el Acuerdo sobre la Aplicación de las Medidas Sanitarias y Fitosanitarias de la OMC, en el sentido que el enfoque apropiado para garantizar la inocuidad de los alimentos es aquel basado en el análisis de los “riesgos”, conforme una evaluación sustentada en principios científicos.

**4. ¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?**

Frente a la epidemia de sobrepeso y obesidad, la Argentina impulsó el Plan Nacional de Prevención del Sobrepeso y la Obesidad en Niños, Niñas y Adolescentes, denominado “Plan ASÍ”. Este Plan, que será implementado entre 2019‐2023, se trata de un plan integral e intersectorial coordinado por el Ministerio de Salud y Desarrollo Social en articulación con otras áreas de gobierno como los Ministerios de Educación, Cultura, Ciencia y Tecnología , y el Ministerio de Agricultura, Ganadería y Pesca, las provincias, así como con alianzas estratégicas de organismos internacionales y organizaciones no gubernamentales.

Esta estrategia está planteada a partir de cuatro objetivos:

1. Fortalecer la educación alimentaria y nutricional (EAN) y la educación física

2. Favorecer la Comunicación, Sensibilización y Participación Social.

3. Garantizar una buena calidad nutricional en los programas sociales con componente alimentario y promover los sistemas alimentarios sostenibles.

4. Promover políticas regulatorias a nivel nacional y provincial.

El Plan ASI se basa en los siguientes principios orientadores:

1. Enfoque de derechos

2. Equidad e igualdad de género

3. Transparencia

4. Eficacia y efectividad

Por otra parte, desde el Ministerio de Agricultura, Ganadería y Pesca se han implementado las siguientes acciones:

**Campaña “Mas frutas y Verduras” de promoción de consumo**: Es una iniciativa público‐privada que consiste en traccionar la producción y la oferta, generando mayor demanda y abrir así nuevas oportunidades para los productores de todas las regiones del país y promocionar el consumo, para elevar el bienestar y mejorar la salud de la población.

**Campaña “Consuma pescados y mariscos argentinos” de promoción de consumo de pescado argentino**: En pos de promover un consumo diversificado de carnes, se ha lanzado la campaña “Consuma pescados y mariscos argentinos” que, con el lema “el 19 de cada mes comemos pescado”, promueve la incorporación de las distintas variedades de productos pesqueros a la dieta de los argentinos.

**Argentina 2014 Libre de Grasas Trans (conjuntamente con el Ministerio de Salud y Desarrollo Social):** A partir de las recomendaciones emanadas por la OMS en la Declaración de Río de Janeiro (2008) y la Estrategia Mundial sobre régimen alimentario, actividad física y salud, se conformó la Comisión Nacional para la Reducción de Grasas Trans, integrada por los Ministerios de Salud y Desarrollo Social y de Agricultura, Ganadería y Pesca , junto con las Cámaras de la industria de alimentos y bebidas y otros organismos como Universidades y ONGs.

Como resultado del trabajo de la Comisión intersectorial se lanzó la iniciativa “Argentina 2014 Libre de Grasas Trans”, destinada a reducir el consumo de estas grasas a través de diferentes vías.

Por un lado, se trabajó en un proyecto de modificación al Código Alimentario Argentino, que finalmente fue incorporado por Resolución Conjunta SPReI 137/2010 y SAGyP 941/2010, la cual establece límites máximos de contenido de grasas trans en los alimentos. Para facilitar la implementación de la reforma al Código, la iniciativa incluyó la comunicación a los consumidores sobre el efecto negativo que representa el consumo de grasas trans para la salud, como también a la industria, para proporcionar información y herramientas que faciliten el cumplimiento de la normativa y así mejorar la calidad de todos los productos, a través de la “*Guía de recomendaciones para la pequeña y mediana industria*”.

**Menos sal, más vida: Reducción de Sodio (conjuntamente con el Ministerio de Salud y Desarrollo Social)**: Esta iniciativa persigue disminuir el consumo de sodio de la población en su conjunto para reducir la importante carga sanitaria que representan las enfermedades cardiovasculares, cerebrovasculares y renales. Constituye una de las principales acciones de promoción de la salud y forma parte de un plan integral de prevención y control de enfermedades crónicas no transmisibles.

Componentes de la iniciativa:

• Concientización a la población sobre la necesidad de disminuir el consumo de sodio a través de los alimentos procesados y la incorporación de sal de mesa en las comidas.

• Reducción progresiva del contenido de sodio de los alimentos procesados mediante acuerdos con la industria de alimentos.

• Reducción del contenido de sal en la elaboración del pan artesanal.

El 16 de diciembre de 2013 fue promulgada y sancionada la Ley 26.905, cuyo principal objetivo es promover de forma integral la reducción del consumo de sodio en la población, y también determinar lineamientos para el desarrollo de políticas sanitarias que conlleven a la promoción de hábitos saludables. La ley fija los valores máximos de sodio que deberán contener ciertos grupos de alimentos y los plazos de adecuación que tendrán las empresas elaboradoras. El país cuenta así con un instrumento legal que encauza y regula los esfuerzos dirigidos a reducir el impacto negativo sobre la salud de la población.

**“El mercado en tu barrio” (conjuntamente con el Ministerio de Producción y Trabajo)** : El objetivo de este Programa es acercar la producción de alimentos a los consumidores de todo el país ofreciendo: más calidad, variedad, nutrición y precios accesibles, generando valor agregado para la población y la agroindustria. Busca, además, posicionar las ferias y mercados como espacio de comercialización directa productor – consumidor con productos que cumplen las condiciones higiénico‐sanitarias, a un precio razonable, asegurando la calidad y variedad en la oferta. Bajo el mismo se realizan campañas de promoción del consumo de productos estacionales frescos brindando información nutricional y recomendaciones para disminuir desperdicios de alimentos.

**Plan Nacional de Reducción de Pérdida y Desperdicio de Alimentos**

Este Programa coordina, propone e implementa políticas públicas, en consenso y con la participación de representantes del sector público y privado, sociedad civil, organismos internacionales, entre otros, que atiendan las causas y los efectos de la pérdida y el desperdicio de alimentos.

Funciones:

a) Investigar y coordinar iniciativas, actividades y proyectos entre los actores implicados en la producción primaria, elaboración, distribución y consumo de alimentos.

b) Facilitar la transferencia de tecnologías apropiadas a los objetivos del programa en los diferentes eslabones de la cadena de los productos básicos.

c) Elaborar manuales de buenas prácticas y de recomendaciones sobre la pérdida y el desperdicio de alimentos y fortalecer los vigentes.

d) Profundizar los diagnósticos en infraestructura de almacenamiento y transporte que permitan proponer medidas que minimicen la pérdida de productos en las etapas de “post” cosecha y distribución.

e) Implementar campañas de sensibilización de los perjuicios de la pérdida y desperdicio de alimentos y de las acciones que apunten a la revalorización de los mismos y al consumo responsable necesario para instalar un nuevo paradigma de sociedad que reduzca, recicle y reutilice los alimentos.

f) Desarrollar conocimientos y capacidades en los operadores de la cadena alimentaria para aplicar prácticas de manipulación de alimentos inocuas que eviten/reduzcan las pérdidas y el desperdicio de alimentos por incumplimiento de los estándares mínimos.

g) Desarrollar un sello de garantía que avale el proceso productivo con pérdidas mínimas.

h) Promover vínculos con bancos de alimentos y otras entidades nacionales e internacionales.

i) Suscribir convenios con medios de comunicación, establecimientos educativos, Organizaciones No Gubernamentales, asociaciones e individuos prestigiosos de diferentes ámbitos comprometidos con la importancia de la iniciativa y los objetivos del Programa.

El abordaje se realiza por medio de tres pilares: a) gobernanza y alianzas; b) investigación, tecnología y conocimiento, e c) información y comunicación:

a) Gobernanza y alianzas: refiere a la participación multisectorial e interdisciplinaria, a la conformación de espacios de intercambios y la promoción de alianzas estratégicas que tomen en cuenta el enfoque de reducción de pérdida y desperdicio de alimentos. Se invita a instituciones y entidades a firmar cartas de adhesión al Programa Nacional y a formar parte de la Red Nacional, respondiendo a la necesidad de conformar una alianza nacional que permita un diálogo fluido y acciones coordinadas, en pos de lograr resultados a corto y largo plazo.

Argentina ha sido pionera, en la región de América Latina y el Caribe, en la creación de un Programa Nacional liderado por un organismo público, y en contar con una campaña de comunicación.

b) Investigación, tecnología y conocimiento: Es de vital importancia contar con información científica respecto de pérdidas y desperdicios, así como también información sobre tecnologías para alargar la vida útil, utilización de subproductos y recupero de alimentos; y sobre logística y gestión de stocks. En 2015, la Subsecretaría de Alimentos y Bebidas realizó el primer ejercicio de estimación sobre pérdidas y desperdicio en alimentos, el cual requiere mayor profundización, aunque permite tener cifras como punto de partida para próximas investigaciones.

c) Comunicación: Campaña Valoremos Los Alimentos.

Septiembre a diciembre 2015: lanzamiento de 8 videos en YouTube y redes sociales.   Mayo 2016: se difundieron piezas comunicacionales dirigidas a consumidores de la campaña Valoremos Los Alimentos (3 flyers y un manual para aprovechar al máximo los alimentos y evitar el desperdicio) a través de las redes sociales del Ministerio de Agricultura, Ganadería y Pesca.

**5. ¿Cómo podrían ser estas Directrices voluntarias más útiles para las diferentes partes interesadas, en especial a nivel nacional y regional, una vez aprobadas por el CSA?**

Sería útil que las directrices voluntarias se adapten, mediante un trabajo intersectorial, para poder ser utilizadas como documento rector para la aprobación de políticas intersectoriales.

## ****Amos Wekesa,**** Vi Agroforestry, Sweden

The document covers many things very well.

* Gender – women and children on nutrition well covered, especially under women producers and school going children but I don’t know if lactating women include lactating girls (early pregnancies)
* Availability and access well covered
* SDGs – well covered apart from SDG 13 and 15 which climate change and life on land has been mentioned to affect food systems and nutrition but not considered as SDGs where food security should also be holistically planned for
* Chemicals and pesticides (aflatoxin) well covered – but chemicals with cancer causing agents should be mentioned to be abolished forever – Use of safe/substantiable biological pesticides should be developed
* GMOs – not mentioned (someone can easily use this document to promote such policy for food availability) article 43 (a) and other areas where chemicals, antibacterial resistance and pesticides mentioned
* Agriculture was inclusive to capture crops, fisheries, livestock and forestry as well as agrobiodiversity but does not lift up AGROFORESTRY properly “We need to request the document to include agroforestry – tree fruits, organic honey, milk, herbs/medicine and direct livelihoods and incomes to access food – this can be put under article 43 (d)
* Diversification foods, system and diets – a propose under 43 to have it as stand alone so that such policy might make countries change production systems to be diversified, traditional diets and embrace agroecology.

## [Nicole Yanes](http://www.fao.org/fsnforum/member/nicole-yanes)****,**** International Indian Treaty Council, United States of America

Respecful Greetings,

Please find attached the International Indian Treaty Council's contribution and comments on the Zero Draft for Voluntary Guidelines on Food Systems and Nutrition submitted via email on 02.09.2019 and now shared via the CFS website.

Best Regards,

Nicole Yanes  
International Indian Treaty Council

**Contributions for the Zero Draft of the CFS Voluntary Guidelines on Food Systems and Nutrition Submitted by the International Indian Treaty Council**

IITC is a Non-Governmental Organization (NGO) with General Consultative Status to the United Nations Economic and Social Council. The International Indian Treaty Council (IITC) is an organization of Indigenous Peoples from North, Central, South America, the Caribbean and the Pacific working for the Sovereignty and Self Determination of Indigenous Peoples and the recognition and protection of Indigenous Rights, Treaties, Traditional Cultures and Sacred Lands.

There is an urgent need to recognize and affirm the United Nations Declaration on the Rights of Indigenous Peoples as the lens through which the CFS Voluntary Guidelines on Food Systems and Nutrition should be developed and implemented. IITC emphasizes in particular the impacts of colonization, dispossession of lands, territories and resources, and the “urgent need to respect and promote the inherent rights of Indigenous Peoples which derive from their political, economic and social structures and from their cultures, spiritual traditions, histories and philosophies, especially their rights to their lands, territories and resources.”[[143]](#footnote-143)

Indigenous Traditional knowledge holders, Indigenous farmers and other Indigenous food producers can make vital contributions to impact global policies and decisions that affect us on themes such as climate change, food and seed sovereignty, sustainable development, cultural heritage and bio-diversity based on the richness of our living cultures, Indigenous sciences and knowledge systems. These vital contributions must be made in a context of a rights based approach, one that reflects the histories, challenges and issues that are unique to Indigenous Peoples worldwide.

As of now the Zero Draft of the CFS Voluntary Guidelines on Food Systems and Nutrition (Zero Draft) excludes the history of colonization of Indigenous Peoples, and in so doing (inadvertently or not) perpetuates the ongoing exclusion of Indigenous Peoples in all their diversity.

It is not enough to simply include Indigenous Peoples in a few discrete “lists” of vulnerable populations. It would be a major step backward in international law if these standards go ahead without the very important recognition of the role of the Declaration on the Rights of Indigenous Peoples. The Declaration was developed for a number of very good reasons, not least of which was the ongoing exclusion of Indigenous Peoples from the benefit of international human rights and environmental standards.

To us, this manifests in the worst ways - by effectively silencing our unique and diverse voices by portraying us as a singular culture, entity, or category (i.e. only as “vulnerable”). Alternatively we are urged to try and fit ourselves into another category like “campesino” for the purposes of advocacy and representation - which we are certain would not be agreed to by Inuit, Cree or many other Indigenous Peoples in the northern hemisphere. The previous absence or limited participation of diverse Indigenous Peoples in processes related to these Guidelines is not a good reason to continue to peripheralize their representation in these Guidelines. We implore you to decide that you will not leave us behind in the development and implementation of these Guidelines.

We do understand that this is probably not the conscious objective of the drafters of the Zero Draft. In fact, we can picture how the conversation went: “If we include specific reference to Indigenous Peoples, we will have to list everyone else in order to be fair - therefore in the interests of expedient drafting and arriving at a document that makes sense for everyone, we will limit their reference to a few places where we are concerned about particularly vulnerable groups.”

This is exactly the same (well-intentioned) argument so often used in international processes that are not Indigenous specific. The actual result of this approach is to uphold and in fact promote the continued oppression of Indigenous Peoples by erasing us in a different way than before.

Prior to 1977, we were not allowed on United Nations grounds. We could not attend or advocate at any UN meeting. From 1946-1977, it was probably most beneficial for all countries concerned to disallow us on UN grounds, so they could continue reaping the benefits of colonization and make global decisions without disruption from Indigenous Peoples. We would argue that in fact the United Nations did not really recognize us as having a role in the UN family until 2007, when the UN Declaration was passed by the General Assembly.

When we as an organization participated in the drafting of the Sustainable Development Goals, we saw the ongoing dwindling of any reference to Indigenous Peoples in goals and targets as they evolved through negotiations. Many States and members of Civil Society assured us that we would not be left behind, that the lack of reference to us specifically would not diminish how the SDGs would be applied. Many State representatives told us “just because you are not referenced does not mean we will forget you.” And yet, for the most part, that is in fact what has happened. These same people will not always be in their positions, either as State or Civil Society representatives. Perhaps it is because we managed to hold on to a specific reference in just a few of the SDGs that subsequent governments and NGOs who were not at the negotiations think those are the only places that Indigenous Peoples might have a role to play.

In drafting new international standards, it is incumbent upon the drafters to think not only of the status quo or current factors influencing their development, but also to consider both history and future.

If the Zero Draft were to proceed as written, and if subsequently applied by a State in an Indigenous Treaty area, Nation or territory: the result would be uneven, potentially unjust and certainly unethical. The Zero Draft requires the addition of the UN Declaration on the Rights of Indigenous Peoples, and specific reference to various articles in order to achieve the desired outcomes. Colonization, land-grabbing, contamination and development has led to the widespread loss of access and outright usurpation of lands, territories and resources that are needed for the practice of Indigenous food systems and related healthy and sustainable diets. For Indigenous Peoples food security, health and nutrition is based on and inextricably linked to their inherent rights to lands, territories and natural resources. To ignore this connection is to miss an opportunity to accurately and fairly portray the rights of Indigenous Peoples in the context of food systems and nutrition.

An analysis should be done by States on previous voluntary guidelines to see what elements work together and which do not. For example, there are voluntary guidelines related specifically to Indigenous Peoples. Have they been applied? Would their application make a difference in the context of food systems and nutrition? States should adopt all the necessary measures to facilitate and ensure meaningful participation at all levels (local, national, international), including legal frameworks, policies and public investments that facilitate and strengthen the autonomous organization of rights holders. States should respect, uphold and enhance Indigenous Peoples’ right to self-determination in food systems governance. This includes ensuring our right to free, prior and informed consent, through our own representative institutions, in the implementation of food systems and nutrition policies.

IITC supports the High-Level Expert Seminar on Indigenous Food Systems: Building on traditional knowledge to achieve Zero Hunger and the contributions and needs of constituencies such as smallholder farmers, fisherfolks, youth, women, pastoralists submitted by the Civil Society and Indigenous Peoples Mechanism for relations with the UN Committee on World Food Security. In addition, IITC has more specific recommendations and contributions to the United Nations Food and Agriculture Organization and its member States in regards to the Zero Draft.

**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?**

Chapter 1 does not reflect the current situation of the underlying problem that currently hinder Indigenous Peoples to have their food systems and healthy diets including genocide, ongoing colonization, and the violation of our rights as Indigenous Peoples. Indigenous Peoples are highly food insecure and are one of the most important stakeholders to be considered when developing the Voluntary Guidelines yet Indigenous Peoples are not mentioned throughout the Zero Draft and should be included under the main stakeholders in Chapter 1 number 3.26.

Indigenous Peoples have suffered from historic injustices as a result of, inter alia, their colonization and dispossession of their lands, territories and resources, thus preventing them from exercising, in particular, their right to development in accordance with their own needs and interests (Preamble, UN Declaration). Indigenous Peoples should have the ability to exercise and implement their rights including self-determination and free prior informed consent to promote and defend their Food Sovereignty and related aspects of their development.

States should address the increasing concern that has always existed of the criminalization of Indigenous land defenders who are defending their right to their food systems and life ways and who face political repression, violence and criminalization for opposing dispossession, forcible relocation, environmental degradation, the impacts of climate change and land-grabbing.

We believe that climate change is one of the single most impactful factors influencing the ability of food systems to deliver healthy diets in the context of a healthy environment. Today, we feel it is well known that increasingly severe impacts of climate change threaten ecosystems and food production around the world for all peoples. Indigenous Peoples are often among the most vulnerable to the effects of climate change and are disproportionately affected by it as we the first ones to face the risk of losing our lands, cultural practices and natural heritage.

If these Voluntary Guidelines are to uphold and not violate the rights of Indigenous Peoples its is necessary for States and the UN FAO to: 1) Take a rights-based approach to food systems and nutrition so that Indigenous Peoples are better able to meet the food related impacts of climate change, incorporating international human rights standards including the UN Declaration on the Rights of Indigenous Peoples; 2) Ensure recognition and respect for Indigenous Peoples’ rights to land, water, seeds and other resources, self-determination, Treaty rights and free, prior and informed consent; 3) Respect and protect traditional and local livelihoods, food sovereignty and subsistence practices; 4) Recognize culture as an essential component of sustainable development; and 5) Incorporate the full participation of Indigenous Peoples in decision making in sustainable development programs and policies at all stages and on all levels.

We urge the UN FAO and its member States work with the Local Communities and Indigenous Peoples Platform (LICPP) created by the UNFCCC COP 24, intended to strengthen and exchange traditional knowledge for mitigating and adapting to Climate Change, based on paragraph 135 of the Paris Agreement[[144]](#footnote-144) and the Indigenous Peoples Major Group for Sustainable Development (SDGs) to ensure broad participation and direct involvement of Indigenous Peoples in this process.

**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?**

For the Voluntary Guidelines to contribute to the promotion of sustainable food systems, enable healthy diets and improve nutrition and sustainable development it has the have the following vital guiding principles that are currently missing 1) Respect and implementation of the Rights of Indigenous Peoples and 2) Environmental Health.

A very important and missing guiding principle for Indigenous Peoples to promote sustainable food systems that improve nutrition and enable healthy diets is Food Sovereignty. Food Sovereignty is a prerequisite for Food Security for Indigenous Peoples as defined in the Declaration of Atitlan: “Food Sovereignty is the right of Peoples to define their own policies and strategies for the sustainable production, distribution, and consumption of food, with respect for their own cultures and their own systems of managing natural resources and rural areas, and is considered to be a precondition for Food Security” (2nd Global Consultation on the Right to Food, Food Security and Food Sovereignty for Indigenous Peoples).

In respect to the guiding principle Realization to the Right to Food it is critical to include the respect and protection of Indigenous Peoples’ traditional lands, territories, resources and subsistence activities by the State. This is fundamentally important for the realization of Indigenous Peoples’ right to food, as such rights form the basis of their existence and cultural identity. Thus taking steps to secure access to such resources is a vital element in the realization of the right to food. The right to food of Indigenous Peoples therefore rests on the “pillar rights” of lands, territories and resources; free prior and informed consent; and the right to decision making in development ([FAO Cultural Indicators Link](http://www.fao.org/tempref/docrep/fao/011/ak243e/ak243e00.pdf)).

**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?**

Under paragraph 41 of the Zero Draft, many cross cutting factors are included but not Indigenous Peoples. These guidelines, if they are to have any ethics and efficiency, cannot be achieved without taking into account Indigenous territories. In order for Indigenous Peoples to have equal access we should also have equitable access in the sense that Indigenous Peoples ought to have their unique and diverse circumstances recognized in the Zero Draft. Due to the absence and consideration of Indigenous Peoples and their food systems there are many policy entry points and policy relevant areas missing.

The integrity of Indigenous Peoples’ food systems is intimately connected to the overall health of the ecology. Ecological/environmental degradation and environmental violence in Indigenous territories has led and continues to lead to lack of access to and contamination of their food, lands and water all needed for the sustainability and health of indigenous and sustainable food systems.

The right to health of Indigenous Peoples is considered both an individual and a collective right, strongly determined by community, land, water, food and the ecology. Beyond the well-being of an individual, it is about the social, cultural, emotional, spiritual and nutritional well-being of the whole community. The displacement from traditional lands due to development, agriculture and extractive activities has resulted in a loss of access to traditional food and medicines with devastating effects on the health of Indigenous Peoples. Moreover, contaminants from sources such as mining, spraying of hazardous toxics, extraction, waste dumping as well as climate change have serious health consequences for Indigenous Peoples. States should put into place measures that address these underlying determinants of malnutrition and poor health among Indigenous Peoples in a comprehensive manner with due regard to the historic discrimination and marginalization faced by these groups (see section three).[[145]](#footnote-145) They should moreover ensure that health care is culturally appropriate and ensure access to traditional food, medicine and treatments.

**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 policy-making?**

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

Indigenous Peoples’ right to food is inseparable from their rights to land, territories, resources, culture and self-determination. An integral human rights-based approach will open constructive dialogue on what policies, regulations and activities are needed to ensure food security for all, regardless of adaptation. Encouraging meaningful participation by all parties and stakeholders will be the key to building trust and resolving ongoing resource conflicts.

Indigenous Peoples’ relationships with their traditional lands and territories forms a core part of their identities and spiritualities and is deeply rooted in their cultures, languages and histories. Since land and its resources form the basis of Indigenous Peoples’ subsistence activities, losing control of these undermines their food and livelihood security and can threaten their survival as peoples. In fact, IITC worked with FAO a number of years ago on what was then fairly groundbreaking: a set of cultural indicators related to food and agriculture. We would like to see more projects like this updating such indicators and creating strategies for dissemination and most importantly, their use in the reporting processes linked to the implementation of these Guidelines ([FAO Cultural Indicators Link](http://www.fao.org/tempref/docrep/fao/011/ak243e/ak243e00.pdf)).

States should respect and enhance Indigenous Peoples’ right to self-determination in food systems governance. This includes ensuring their right to free, prior and informed consent, through their own representative institutions, in the implementation of food systems and nutrition policies.

Additional and related standards that member States should consider in the context of the development of these Guidelines include those developed under the auspices of Treaties, Agreements and other Constructive Arrangements with Indigenous Peoples; the Convention on Biodiversity (CBD); the World Intellectual Property Organization (WIPO); the UN Permanent Forum on Indigenous Issues (UNPFII); ILO 169; the International Convention on the Elimination of all forms of Racial Discrimination (CERD); the Expert Mechanism on the Rights of Indigenous Peoples; the Paris Agreement on Climate Change; and other international standards that recognize and respect the rights of Indigenous Peoples.

Please let us know if you want us to work in assisting you with editing the language of the Zero Draft.

Annex

(click on text for link to document)

1. The Declaration of Tlaxcala, March 8, 2019

2. Declaration of Takahiwai, Takahiwai Marae, Aotearoa (New Zealand), February 5th, 2019

3. Outcome Statement of the “Respecting Our Science and Ways of Knowing: Indigenous Peoples Food Sovereignty, Traditional Lifeways and Climate Change” Convening, Ixtlan de Juarez, Northern Highland Zapoteca Territory, Oaxaca Mexico

4. “The Declaration of Atitlán”, Indigenous Peoples’ Global Consultation on the Right to Food, Atitlán, Sololá, Guatemala, April 17 – 19, 2002

5. Łuk’ae gha Tsin’aen Nek’eltaeni Thank you Creator for Salmon Declaration, August 5th 2017

6. Local Communities and Indigenous Peoples Platform, SBSTA, L18, 7 Dec. 2018

7. International Indigenous Peoples Forum on Climate Change (COP 24), Opening Plenary Statement, Dec. , 2018.

8. 3rd DECLARATION FOR HEALTH, LIFE AND DEFENSE OF OUR LANDS, RIGHTS AND FUTURE GENERATIONS, APRIL 14 – 15, 2018

9. “Indigenous Women and Environmental Violence”: A Rights-based approach addressing impacts of Environmental Contamination on Indigenous Women, Girls and Future Generations. Submitted to the United Nations Permanent Forum on Indigenous Issues Expert Group Meeting “Combating Violence Against Indigenous Women and Girls”, January 18 – 20, 2012

10. The 2nd Global Consultation on the Right to Food, Food Security and Food Sovereignty for Indigenous Peoples “Cultural Indicators for Food Security, Food Sovereignty and Sustainable Development”

11. High-Level Expert Seminar on Indigenous Food Systems: Building on traditional knowledge to achieve Zero Hunger

12. COP 24 in Katowice “Indigenous Peoples Achieve Mixed Results” article written by Andrea Carmen, Executive Director of IITC for Cultural Survival magazine.

13. Cultural indicators of Indigenous Peoples' food and agro-ecological systems, SARD Initiative.

14. Local communities and indigenous peoples platform, Draft decision -/CP.23: FCCC/SBSTA/2017/L.29, Nov. 2017

15. Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security

## Hernando Salcedo Fidalgo, FIAN, Colombia

Usted encontrará en archivo adjunto los aportes de FIAN Colombia a las consultas en línea del Comité de Seguridad Alimentaria sobre sistemas alimentarios y nutrición.

Muchas gracias por su trabajo en este importante proceso.

Un saludo cordial.

Hernando Salcedo Fidalgo  
Coordinador Línea de Nutrición  
FIAN Colombia  
[fiancolombia.org](http://fiancolombia.org/)

APORTES DE FIAN COLOMBIA[[146]](#footnote-146) A LAS PREGUNTAS Nos. 1 y 4 DE LA CONSULTA EN LÍNEA PARA EL PROCESO DE CONSTRUCCIÓN DE LAS DIRECTRICES VOLUNTARIAS SOBRE SISTEMAS ALIMENTARIOS Y NUTRICIÓN[[147]](#footnote-147)

PREGUNTA No 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?**

**¿Refleja adecuadamente el capítulo 1 la situación actual de la malnutrición y las causas y efectos relacionados, especialmente en lo que respecta a los objetivos y metas de la Agenda 2030? ¿Cuáles son los problemas subyacentes que actualmente impiden a los sistemas alimentarios proporcionar dietas saludables?**

En el capítulo 1 en el que se presentan objetivos, contextos y finalidad de las directrices, los enfoques técnicos desde el punto de vista del nutricionismo y de la nutrición como disciplina, se presentan de manera inclusiva y completa para el caso de la malnutrición y de sus efectos relacionados. El problema estructural que podría anotarse al capítulo, es el de avanzar desde el inicio con un enfoque que considera a la “seguridad alimentaria” (ver primera nota de pie de página del documento), como el alcance al que debe apuntarse en la perspectiva de avanzar “en la lucha contra la malnutrición en todas sus formas”. La definición de seguridad alimentaria en el documento apunta que: “Hay seguridad alimentaria cuando todas las personas tienen en todo momento acceso físico, económico y social a suficientes alimentos inocuos y nutritivos para satisfacer sus necesidades alimenticias y sus preferencias en cuanto a los alimentos, a fin de llevar una vida activa y sana. “

Nos centraremos en lo que sigue en mostrar que esta definición es incompleta, y que por ende, puede generar insuficiencias a la hora de interpretar el marco general de objetivos de unas directrices como las propuestas para los Estados frente a los sistemas alimentarios y nutrición.

Las directrices deben estar orientadas por el Derecho Humano a la Alimentación y Nutrición Adecuada (en adelante DHANA), que comprende la posibilidad de su realización cuando se estima que la alimentación es un proceso en que deben considerarse fases como la producción, intercambio, transformación, consumo y aprovechamiento biológico de los alimentos, así como las formas, procesos y tradiciones vinculadas con la alimentación y producción de los alimentos. Cuando se habla del DHANA, estamos tratando de un derecho humano que abarca todas y cada una de estas etapas. Su entendimiento se hace por tanto como una realización progresiva. Esta concepción va más allá de las especificaciones energéticas estimadas como “necesarias para la vida”, y comprende el ciclo alimentario de manera integral. Es así como también presume las condiciones óptimas de todos los componentes del ciclo alimentario, para alcanzar un acceso alimentario que permita la vida plena en su dimensión biológica, social y espiritual.

De manera correlativa a lo expuesto, el DHANA no pretende que la obligación de los Estados se limite a la lucha contra “el hambre” o la supervivencia, sino que además de la seguridad de la provisión alimentaria, se requiere que sea la “soberanía alimentaria”, la que incluya componentes como la capacidad de cada pueblo de definir sus políticas agrarias y alimentarias de acuerdo con objetivos de biodiversidad y sostenibilidad.

El documento tampoco considera de manera clara la relación que existe entre la industrialización de los alimentos y la configuración de un régimen alimentario corporativo, que ha sido precisamente uno de los determinantes más importantes de la malnutrición y de la expresión de obesidad y sobrepeso en las poblaciones de niñas, niños y jóvenes, y en las poblaciones adultas de las sociedades occidentales contemporáneas. Este aspecto introduce el tema de los problemas subyacentes que impiden a los sistemas alimentarios proporcionar dietas saludables a saber:

- Industrialización de los regímenes[[148]](#footnote-148) de alimentos y comestibles y configuración de un régimen corporativo[[149]](#footnote-149) (ver adelante la noción de “homogenización de las dietas”).

- Industrialización de los procesos productivos alimentarios, con impacto por uso de pesticidas, agroquímicos, semillas transgénicas (aportando nuevas formas de considerar la inocuidad de los alimentos).

- Empobrecimiento de la biodiversidad por el impacto de los monocultivos extensivos.

- Uso de exceso de nutriente críticos[[150]](#footnote-150) en los productos comestibles ultraprocesados que son parte mayoritaria de las canastas familiares.

- Ausencia de promoción de los alimentos producidos por proveedores locales, de cosecha (temporada) reales y/o mínimamente procesados.

- Abandono de las tradiciones alimentarias ancestrales, cuyas formas de conocimiento han articulado la vida comunitaria al acto alimentario integral y pleno.

- Enraizamiento de los estilos de vida que se construyen con base en modelos vendidos a través de la publicidad y el mercadeo, sobre todo cuando éstos van dirigidos a niñas, niños y adolescentes.

- Contacto precoz con nutrientes críticos o con sustancias que generan dependencia frente al consumo de productos comestibles ultraprocesados.

Consideramos que las directrices podrían presentar en su parte introductoria estos impedimentos a los regímenes saludables, y tenerlos en cuenta en la formulación del documento final.

PREGUNTA No 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 policy-making?**

**¿Puede proporcionar ejemplos concretos de nuevas políticas, intervenciones, iniciativas, alianzas y acuerdos institucionales que deberían tenerse en cuenta, así como de desafíos, limitaciones y contrapartidas relacionados con los tres elementos integrantes de los sistemas alimentarios presentados en el capítulo 3? En su opinión, ¿cómo sería el sistema alimentario "ideal" y qué objetivos/indicadores pueden ayudar a orientar la formulación de políticas?**

En diversos países se están promoviendo iniciativas de la sociedad civil que, basadas en la evidencia científica y las recomendaciones del Sistema Universal de Derechos Humanos y organismos técnicos como la OMS, buscan mejorar las condiciones y políticas públicas en materia de malnutrición. Algunas de estas experiencias son paradigmáticas, en el sentido de abordar la problemática de la malnutrición desde un enfoque más amplio perfectamente compatible con (y que requiere de) la perspectiva de los Sistemas Alimentarios.

Este es el caso de la lucha contra la obesidad y las enfermedades crónicas no transmisibles (en adelante: ECNTs), especialmente en la población de niñas, niños y adolescentes (en adelante: NNA). A lo largo del proceso de formulación del Informe de la Comisión para Acabar con la Obesidad Infantil[[151]](#footnote-151), quedó claro que los estados deben implementar medidas en términos normativos y de política pública, dirigidas a: i) garantizar un etiquetado frontal en los productos comestibles procesados y ultraprocesados; ii) restringir la publicidad de los productos comestibles ultraprocesados dirigida al público infantil; iii) impulsar la adopción de impuestos a las bebidas azucaradas; y, iv) promover entornos alimentarios escolares saludables.

Este tipo de intervenciones, que requieren ser subrayadas insistentemente en las “Directrices”, son fundamentales tanto para enfrentar la obesidad y las ECNTS, como para fortalecer una acción concertada, libre de la interferencia de la industria, entre los titulares de obligaciones (los estados-gobiernos) y los titulares de derechos (ciudadanos y ciudadanas), en el marco de la realización de los derechos humanos a la alimentación y la nutrición adecuadas (en adelante: DHANA) y el derecho la salud.

La implementación de este tipo de acciones, que deberían ser consideradas por sí mismas directrices taxativas en el proceso de formulación de las “Directrices”, son la oportunidad para una confluencia afortunada de derechos, enfoques, conceptos y acciones, que desarrolladas en conjunto gracias a su complementariedad, suponen una mejora sustancial en las condiciones globales de la alimentación humana y una reducción de la presión sobre los bienes comunes y el planeta. En ese sentido, enfrentar la obesidad y las ECNTS debe ser considerado como elemento clave para: i) la realización del DHANA y el derecho a la salud; ii) garantizar la soberanía alimentaria de los individuos, comunidades y pueblos; iii) promover Sistemas Alimentarios sostenibles y respetuosos del ambiente, el planeta y los derechos de las personas y demás formas vivas a futuro.

Sirva como ejemplo prospectivo de este enfoque, mencionar que las acciones públicas que se dirijan a la lucha contra las causas estructurales y los impactos de la obesidad y las ECNTS (así como de otras formas de malnutrición), no pueden estar desligadas de confrontar, como imperativo de política pública, la homogenización de las dietas. Esto en razón a que los intereses corporativos que están detrás de este fenómeno se rigen por el afán de lucro y la imposición de consumos y hábitos perjudiciales para la salud humana y planetaria. A su vez, la movilización pública, estatal y social contra la homogeneización de las dietas, no puede ser concretada si a su vez no se defiende, promueve y/o rescata la diversidad alimentaria de los pueblos y territorios. En línea con este encadenamiento reflexivo, la diversidad alimentaria debe propiciarse al tiempo que se garantiza la gobernanza de las poblaciones sobre sus sistemas alimentarios, en una lógica de promoción y respeto de la Soberanía Alimentaria. Finalmente, pero no lo último, la Soberanía Alimentaria pretendida es justo la que los movimientos sociales como La Vía Campesina vienen reclamando: una Soberanía respetuosa de los derechos de las personas, del ambiente, el planeta y los derechos humanos de las futuras generaciones.

Otro elemento que creemos debe ser incluido en las “Directrices”, es la urgencia de recomendar a los estados la construcción de perfiles nutricionales realmente adaptados a las necesidades de las personas, las comunidades y sus territorios. Por eso mismo, aceptables culturalmente y que posibiliten la realización de los derechos (especialmente del DHANA, el derecho a la salud y a un ambiente sano). En aras de profundizar la lucha contra las formas de producción, extractivismo y consumo que destruyen nuestras capacidades alimentarias y al planeta mismo, así como contra las políticas o falsas soluciones que lejos de mejorar los problemas alimentarios los mantienen o profundizan, la adopción de estos perfiles debe regirse por procesos altamente participativos, incluyentes y liberados del poder hegemónico del “saber y el conocimiento institucionalizado”[[152]](#footnote-152) Un avance en ese sentido sería muy importante para desarrollar políticas o programas asistenciales que lejos de profundizar la dependencia, genere capacidades; algo particularmente relevante a la hora de poner en marcha, por ejemplo, los programas de alimentación escolar, la ayuda alimentaria en casos de emergencia u otras formas o expresiones asistencialistas.

## ****Anita Utheim Iversen,**** Ministry of Trade, Industry and Fisheries, North Macedonia

Reference is made to the call for comments to the Vo CFS Voluntary guidelines on food systems and nutrition.

The Vo draft states that policy and institutional reforms are key to promoting sustainable food systems that improve nutrition and enable healthy diets. The 45th CFS session in 2018 endorsed a policy process which is expected to result in Voluntary Guidelines on Food Systems and Nutrition. The Voluntary Guidelines, like earlier CFS products, are intended to be a reference document that provides guidance.

At its 41th session, the CFS, based on a CFS-HLPE report, recognized that the sustainability of fisheries and aquaculture is a fundamental condition for food security and nutrition. CFS recommended several actions to address the development, policy, management and enforcement challenges in order to maintain and enhance the contribution of sustainable fisheries and aquaculture to nutrition and food security. These policy recommendations should be referred to in the CFS Voluntary guidelines on food systems and nutrition, making sure that the CFS follows its own recommendations – to make fish a visible, integral element in food security and nutrition strategies, policies and programmes. We suggest to include a footnote in paragraph 40 in the Vo draft, with reference to the CFS policy recommendations on Sustainable Fisheries and Aquaculture for Food Security and Nutrition: <http://www.fao.org/3/a-av032e.pdf>

More over under chapter 1 "Production systems", a number of policy- relevant areas are mentioned. We are happy that you have inserted the footnote nr 23, which reminds us that in the UN the word "agriculture" also refers to fisheries and aquaculture, however to make sure that fish is "a visible, integral element" in this document, the policy-relevant areas could also specify "The role of fish in food security and nutrition". And that sustainable fisheries and aquaculture should be recognized as a fundamental condition for food security and nutrition. Fish should be a visible, integral element, with special regard to promoting fish as a source of proteins and micronutrients.

Best regards,

Anita Utheim Iversen  
Senior Adviser  
Ministry of Trade, Industry and Fisheries

## Marisa Macari, El Poder del Consumidor, Mexico

Please find attached the submission for the online consultation for the Voluntary Guidelines on Food Systems and Nutrition from El Poder del Consumidor (Mexico).

Thank you kindly for your consideration.

Best wishes,

Marisa Macari, on behalf of El Poder del Consumidor

**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?**

* 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).[[153]](#footnote-153) 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.

**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?**

* 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.

**3. 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?**

* 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.

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

* 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.

## [Joris Gaudaré](http://www.fao.org/fsnforum/member/joris-gaudar%C3%A9)****,**** Confédération paysanne, France

Please find attached the contribution of the Confédération paysanne (France).

Thanks for your consideration,

Best wishes.

1. **Le principal problème qui empêche les systèmes alimentaires de fournir des régimes alimentaires sains est l'hyper financiarisation de ceux-ci** .En d'autres termes, l'alimentation devenue un simple objet de commerce, a conduit ses acteurs à rechercher le profit financier en délaissant la nutrition. Ce commerce international de l'alimentation profite avant tout aux multinationales du nord , qui ont industrialisé tous les secteurs de la chaîne alimentaire. Cette hyper industrialisation concurrence et sacrifie les paysans ou paysannes des pays les plus vulnérables, et donc prive les populations de ces pays d'une alimentation de qualité, voir menace l'accès

Les pays occidentaux qui depuis des décennies industrialisent l'alimentation subissent eux aussi la concurrence de pays qui se donnent les moyens d'industrialiser encore plus .L'actualité avec le mercosur est parlant , le brésil brûle l’Amazonie pour inonder les marchés européens et internationaux de viande bovine ou de soja . En validant cet ALE récemment , l'Europe a simplement donné son permis de brûler l'Amazonie ou une des voûtes essentielles de l'écosystème Terre .

Afin de retrouver un équilibre nutritionnel partout et pour tous, il n'y a pas d'autre solution que de sortir l'alimentation des traités de commerce internationaux vu que la nutrition n'y est rien d'autre que la variable d'ajustement. Les régions et nations doivent définir elles même leur système alimentaire, fondé sur les savoir-faire paysans ou des artisans transformateurs locaux, le tout encadré si besoin par une recherche à objet purement public. C'est par exemple, ce qu'il ressort de l'étude publique réalisée en région Occitanie qui promeut les produits locaux de haute qualité, dont le BIO et, la population souhaite le maintien de paysans et paysannes nombreuses .Des sondages de l'IFOP sur la population française vont aussi dans le sens d'une relocalisation de l'alimentation et donc relocalisation de la nutrition.Voir aussi le récent rapport du CESE européen sur circuit court et agroécologie , le rapport du CESE français sur les différents impacts liés au commerce international , ou l'avis 81(pour une alimentation favorable à la santé ) du CNA /parlement français de l'alimentation

**Il serait pertinent que le CSA démontre davantage le lien entre industrialisation /financiarisation/mondialisation du secteur alimentaire et ce constat nutritionnel des populations humaines que vous décrivez dans le premier chapitre .**

2. Il semble pertinent que le CSA propose des principes directeurs concrets au point 36 du 2ème chapitre, notamment sur **« l'Approche systémique, globale et fondée sur des faits concrets ».** La production animale comme végétale souffre de l'hyper sélection qui vise le seul rendement grain, carcasse ou laitier, associé à la planification industrielle visant à sectoriser les productions. La ferme historique diversifiée en polyculture élevage, laisse peu à peu la place aux filières industrielles, la nutrition laisse la place à la production de matière première de masse. La chimie, médicaments, OGM ou NBT sont les fers de lance de cette industrialisation devenue systémique. Une pomme de variété anciennes est par exemple 100 fois plus riche en nutriments qu'une pomme de variété moderne.

Si l'on connaît mieux les effets des pesticides sur la santé, notons que les produits animaux industriels ont aussi perdu beaucoup de leur potentiel nutritionnel. En effet, plusieurs études notamment de l'INRA, démontrent l'existence de différences concrètes sur la présence d'oméga 3, de vitamine B12, B2 suivant le mode d'élevage. **L'élevage plein air, l'agropastoralisme ou la polyculture élevage est donc a promouvoir comme un principe directeur**. L'élevage paysan respecte les forêts, il permet de la maintenir vivante en équilibrant la végétation des sous bois et la protégeant du feu. Dans les montagnes comme dans les vallées et plaines, un retour généralisé à la polyculture élevage est une nécessité de santé publique. En effet, outre les bienfaits nutritionnels des produits animaux à l'herbe, l'élevage, par son apport de matière organique aux terres cultivables, permet aux végétaux de s'exprimer sans apports chimiques. Les variétés classiques de légumes ou de céréales, oléagineux, protéagineux etc obtiennent dans ces conditions de très bons résultats à la fois en terme nutritionnel, qu'en terme de rendement production. Un sol riche en matière organique issu de l'élevage paysan permet aussi aux plantes de mieux résister à la sécheresse.

Notons qu'un élevage plein air ne nécessite pas ou peu d'utilisation d'antimicrobiens externes. La France progresse depuis sa loi de l'alimentation/agriculture/forêts de 2014, l'emploi d'antibiotiques a diminué de 30%. Il convient de signifier que cette baisse ne prends pas en compte les achats privés d'antibiotiques dans les pays voisins, ce qui pose ici le problème de l'harmonisation des normes sanitaires par le haut. **La problématique des anti microbiens est abordée au point j, il serait pertinent de signifier aux États et à l'OIE de définir rapidement une réglementation internationale très stricte sur le sujet. Ce qui permettrait généraliser la polyculture élevage citée précédemment.**

**Un autre principe directeur nutritionnel liée à l'économie serait de promouvoir l'économie sociale et solidaire.** Ceci bien entendu pour éviter à toute bio économie locale le dérapage financier des acteurs mondialisés actuels. Les petites coopératives de producteurs, et/ou société coopératives où les salariés participent directement à la gérance de l'entreprise, devraient être des exemples de développement nutritionnel. Ces petites coopératives ne sont peu ou pas présentes dans les instances de décision françaises ou européennes, la fédération des coopératives censées les représenter préfère soutenir les plus grandes, celles où les producteurs ont peu à dire.

Dans le chapitre 3 vous évoquez à juste titre l'éducation nutritionnelle, **ce qu'il faudrait ajouter vu la situation dramatique du renouvellement des générations paysannes dans la plupart des pays, c'est l’éducation/ promotion du métier Paysan lui même.**

4 Sortir l'Alimentation des traités commerciaux nécessite de créer une instance spécifique capable de gérer des échanges alimentaires éthiques. La biodiversité cultivée s'est développée par les échanges passés, il y a toujours eu du commerce alimentaire, mais ces productions étaient des surplus dans la plupart des cas.Un autre cas était la non possibilité géographique ou climatique de cultiver , beaucoup d'épices, le café, cacao etc. Si une partie des échanges mondiaux resteront nécessaires, notamment avec le changement climatique, ils est possible et souhaitable de les diminuer drastiquement en mettant en place un cadre politique spécifique et souverain. La priorité de ce cadre politique ouvert à la société civile doit être d'assurer la souveraineté alimentaire des peuples, le commerce n'étant ici qu'une valeur d'ajustement. La FAO sous l'égide des nations unies devrait logiquement tenir ce rôle.

En attendant, concernant les systèmes alimentaires de la transformation et de la distribution, on assiste depuis plusieurs décennies à la concentration des acteurs et à la main mise par ceux ci des marchés financiers. Aucune règle ne permet de contrôler la taille de ces structures, de contrôler les marges réalisées par les actionnaires. Dans ce rapport, il est dans le rôle du CSA d'être plus ambitieux. En effet, il est difficile de croire que ces acteurs vont changer leur habitude sur de simples recommandations, vu l'absence de politiques nutritionnelles et de réelle politique de prix pour les producteurs. Pour l'instant, dans ce schéma majoritaire de l'alimentation, les producteurs vendent en dessous ou au prix de production. Le monopole financier de la transformation et de la diffusion permet cette oppression sur les paysans, dans ce schéma atteindre l'objectif d' une bonne nutrition pour les plus démunis est impossible.

## [Benjamin Uchitelle-Pierce](http://www.fao.org/fsnforum/member/benjamin-uchitelle-pierce)****,**** HarvestPlus, United States of America

Dear CFS Colleagues,

Thank you for the excellent draft and for inviting feedback. Attached please find my comments.

Benjamin Uchitelle-Pierce

**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?**

Yes it does – however it would be advisable to draw attention to the **urgency** of the issue; given that the guidelines will be released later in 2020 – by when there will be only 10 years left for meeting the 2030 SDG targets; five years to meeting 2025 WHA targets and we will be already five years into the UN Decade of Action on Nutrition. Therefore, the urgency of following these voluntary guidelines cannot be emphasized enough. Moreover, SDG2 underlies several of the other – if not all – SGDs; therefore, achieving the SDG2 targets is crucial for the achievement of all targets.

Other important points that can be included regarding the current situation of malnutrition as follows;

* According to the latest SOFI (2019), over 820 million people suffer from hunger, corresponding to about one in every nine people in the world. This figure which has been stable or even increasing (depending on the region) is alarming as it means we are moving further away from reaching the SDG2 targets. The same report also stated that over 2 billion people do not have regular access to safe, nutritious and sufficient food - that is one in four people [[Ref](http://www.fao.org/state-of-food-security-nutrition/en/)]; Moreover over 3 million deaths (children under five) related to malnutrition with maternal and child undernutrition contributing to 45 percent of deaths in children under five [[Ref](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(13)60937-X/fulltext)] ; around 2 billion people suffer from micronutrient malnutrition [[Ref](http://www.fao.org/3/x0245e/x0245e01.htm)].
* Non-communicable diseases (NCDs) are on the rise and are estimated to cause almost 75% of deaths around the world. One of the major causes of NCDs is unhealthy diets and malnutrition [[Ref](https://globalnutritionreport.org/reports/global-nutrition-report-2018/)].

**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?**

Climate change adaptation and mitigation is mentioned on page 11. However, these overarching guiding principles (on page 8) could also include a principle on adopting climate-smart approaches/interventions, that would abate or alleviate the negative impacts of climate change not just on the availability of food but also on the quality of food. Recent evidence shows that by 2050, the increasing CO2 concentration will result in many crops – in particular, staple crops – grown under such conditions losing their nutrition levels by 3–17%. This increase in CO2 concentration could cause an additional 175 million people to be zinc deficient, and 1.4 billion women of childbearing age and children under five who live in countries with greater than 20% of anemia prevalence would lose >4% of dietary iron intake [[Ref](https://environment.harvard.edu/sites/default/files/smith_2018_impact_of_anthropogenic_co2_emissions_on_global_human_nutrition.pdf)]. Therefore, technological solutions (such as micronutrient enriched, biofortified staple crops) and policies for adopting these should be encouraged.

**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?**

Potential policy entry points include:

* Food-based nutrition interventions such as fortification – included under “processing and packaging” and biofortification included under “production system” are both proven to be cost-effective and scalable interventions for improving micronutrient intake. They are also equitable (corroborating with point 11) since staple foods are consumed by all members of a family – regardless of age or gender – unlike other nutritious foods (such as animal source foods which may be allocated to male members).
* Rural smallholders – as both producers and consumers of food – are vulnerable to malnutrition. Their inclusion was highlighted in the previous CFS recommendations, but they seem to be missing from these guidelines. Given that the majority of the food in developing countries is produced by smallholders, and that majority of the population in developing countries reside in rural areas, rural smallholders could be centralized for policy entry points. Potential policies could include subsidized seeds of improved, nutritious varieties of crops (such as biofortified crops), linking smallholders to public food procurement.
* On page 10, under the policy-relevant areas, biofortification could be given as an example of sustainable and nutrition-sensitive agricultural production models. Globally 21 countries have now included biofortification in their national policies [[Ref](https://www.harvestplus.org/knowledge-market/in-the-news/catalyzing-biofortified-food-systems-2018-annual-report)]. For further evidence on biofortification see [here](https://www.harvestplus.org/evidence-document).
* On page 12, under Handling, Storage and Distribution heading, practices, and technologies to retain and/or add nutritional value can be included among the policy-relevant areas.
* On page 13, biofortification could be included under the Supply of Nutritious Foods heading: Policies pertaining to input access/availability, extension services, and incentives (e.g., tax breaks or subsidies, guaranteed procurement schemes) could be implemented to stimulate the production of nutritious biofortified staple crops.
* Agree with the sentence “Actions should be taken to make nutritious food affordable for all population groups” on page 15. Since the poor don’t tend to have access to diverse, healthy diets and since most of the calories consumed by the poor come from staple crops, improvement of these staple crops to delivery other nutrients (such vitamins and minerals) through biofortification or fortification, is a low hanging fruit for increasing the nutrient intake of these populations.
* On page 17, under food quality improvements title, biofortification can be included alongside fortification as another evidence-based cost-effective and scalable intervention for improving the nutritional quality.

**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 policy-making?**

* One promising tool for improving food systems through their main building blocks (i.e., staples) is the substitution of conventional staple crops with their biofortified (i.e., enriched with micronutrients by using conventional plant breeding methods) counterparts. Biofortification is a low hanging fruit that requires minimum behavior change; is cost-effective and has been proven to improve not just nutrition but also health outcomes [[Ref](https://www.harvestplus.org/evidence-document)].
* With regards to challenges, constraints, and trade-offs, the reciprocal relationship between climate change and farming practices, urbanization, disparities, and equity issues and equitable distribution and access to food and technology are the prominent ones.
* An ideal food system should be sustainable, resilient, equitable, and climate-smart throughout a productive whole value chain, that contributes to biodiversity, environment, and it should promote improved health and nutrition for all.

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

* Agree with the principles explained in Section IV. Specifically, the forum mentioned in paragraph 59 would be very helpful for the stakeholders to learn best practices from each other.
* In addition to these principles, it is important to have the guidelines referred to/endorsed by important international platforms such as G20 where commitment/buy-in by national/multilateral leaders could be ensured.

## [Daniela D. Penafiel Anchundia](http://www.fao.org/fsnforum/member/daniela-d-penafiel-anchundia)****,**** Rural Research Center - ESPOL – Ecuador, Ecuador

Dear All,

Please receive my contribution from Ecuador, towards SDG 2 based on the voluntary guidelines. Working together we can achieve the ZERO hunger goal and ZERO malnutritrion too.

Greetings from Ecuador,

Daniela PENAFIEL, MSc, PhD. Sustainable diets Research and Nutrition Education for the cocnservation of natural resources. Specialist in Rural Development and Nutrition.

Dolores PENAFIEL, MSc, PhD

Specialist on Nutrition Education for the Conservation of Natural Resources

**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?**

I believe the chapter in section 1.1 requires introducing the concept of food sovereignty as it is centered to the universal concept of health (physical, emotional and social balance), to include local production and cultural preferences towards sustainability (SDG2).

In section 1.2 stunting needs to be expressed as chronic limited access to foods for several generations expressed as people shorted for their age.

In section 1.11 food cultivation knowledge is key to empower the most vulnerable for self-reliance, particularly empowering women in food production practices.

In section 2.22, different nations require to initially assess they local resources in terms of food species both animal and plant, along with their nutrient contributions to prioritize species within interventions.

Section 2.24, d) socio-cultural (also indigenous/traditional knowledge).

**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?**

Based on our experience, the principles are of great importance particularly when working with c) and e) in developing countries when targeting most vulnerable populations. In Ecuador, the GABA’s have been lately proposed and most health professionals related to nutrition are increasingly it for educating the new professionals and consumers.

**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?**

Based on the Ecuadorian experience on the several efforts to link health and education, it is believed that nutrition education should be included in the local curriculum from basic up to advanced education since the increasing prevalence of non-communicable diseases related to nutrition require preventive efforts more than expensive curative ones. The already existing legislation supports the direction of education towards health, but in practice these are detached and are not consistent when action is needed. In resume, adhesion of health and educational policies require to be based on the principles this VOLUNTARY GUIDELINES and to be adopted by all levels of education in all participating countries (both developed to create awareness and prevention and developing to solve the already existing problems and improvement). Particularly, to avoid duplication of efforts since most of the countries are increasingly interested in working towards SDG2.

**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 policy-making?**

In Ecuador, the dietary guidelines released a couple of years ago are imperative not only because these are based on sound evidence, but most of them have a sustainably component into their recommendation. However, the universities in Ecuador do not train students in nutrition, agriculture or social fields on the guidelines nor in educating on food supply, environments and consumers using sound theories. This is the corner stone of the lack of understanding of the food and nutrition systems from the top to bottom of the health and educational system. Therefore, the proposed indicator for sustainable development is the number of primary, secondary schools that included nutrition education into their curriculum suing the principles of the voluntary guidelines in order to educate the new generations. Also, the number of Universities that have Nutrition Education undergrad, graduate and superior education programs based on the principles of the voluntary guidelines in order to have well trained professionals to educate at primary and secondary schools. In order to educate, the present generation the proposed indicator would be the number of parents and grandparents receiving courses of nutrition education by their children/grandchildren validating local and traditional knowledge.

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

The guidelines must be voluntary accepted and introduced into their educational curriculum as proposed earlier. Education is the corner stone of healthy eating habits towards SDG 2, particularly when it is available if the different languages most vulnerable people speak (all ethnicities).

## [Hamadi Mohamed Abba](http://www.fao.org/fsnforum/member/hamadi-mohamed-abba-0)****,**** ONG ADJMOR, Mali

Originaire du Sahel, en activité dans la Région de Tombouctou au Mali, je me limite aux deux (02) premières questions dans le cadre de cette contribution sur les directives volontaires.

Le contexte de ma région est marqué par :

* Les effets du changement climatique (l’assèchement des lacs)
* L’insécurité persistante (des populations réfugiées) depuis 2012
* Une gouvernance qui n’évolue pas en compétences pour relever les défis de pauvreté et d’insécurité alimentaire

1) Le chapitre 1 reflète-t-il adéquatement la situation actuelle de la malnutrition et ses causes et impacts connexes, en particulier conformément aux buts et objectifs de l'Agenda 2030? Quels sont les problèmes sous-jacents qui empêchent actuellement les systèmes alimentaires de fournir des régimes alimentaires sains ?

Les problèmes sous-jacents sont entre autres :

* La sécurité alimentaire des ménages perturbée par la pauvreté, l’instabilité du fait des guerres récurrentes
* L’environnement social en rapport aux pratiques et comportements des individus et des communautés dans l’observation et le respect des consignes de santé et de traitement des maladies qui sont des facteurs de malnutrition
* L’accès aux soins de santé et aux structures de soins : l’accessibilité aux centres de santé n’est pas assurée dans beaucoup des zones pour les populations en majorité rurales. Le cas des enfants malnutris et des femmes allaitantes ou en grossesses est le plus grave en milieu rural du faite de l’éloignement des centres de santé. La qualité des services fait souvent défaut
* L’insuffisance des ressources humaines et économiques : l’accès aux services sociaux de base (eau potable, soins de santé de qualité et l’éducation) n’est pas garanti en milieu rural pour des raisons économiques et même par manque de ressources humaines compétentes

2) Quels devraient être les principes directeurs pour promouvoir des systèmes alimentaires durables qui améliorent la nutrition et permettent une alimentation saine ? Quels sont vos commentaires sur les principes énoncés au chapitre 2 ? Sont-ils les plus appropriés à votre contexte national/régional ?

Les principes directeurs sont entre autres :

* La volonté politique des Etats de combattre la malnutrition sous toutes ses formes
* L’amélioration et la consolidation de la gouvernance locale dans tous les domaines en lien avec le développement social, économique et culturel
* La valorisation et la promotion des filières du secteur primaire qui emploie la majorité de la population.
* Le renforcement organisationnel et institutionnel des structures des producteurs
* Le renforcement de capacité et d’encadrement des OSC pour une plus grande implication dans les systèmes de production
* Aménagement adapté et organisation des territoires en adéquation avec les contextes sociopolitiques, culturels et géographiques et environnementaux
* Approche de développement intégré, équilibré et harmonieux et favorisant la réduction des disparités inter et/ou intra régionales et l’acceptation des différences renforçant la confiance mutuelle entre les communautés des mêmes terroirs.
* Investissement dans les infrastructures de conservation et de transformation des excédents
* Réhabilitation des anciens lacs ou terroirs asséchés en raison des effets (déficit pluviométrique et sécheresses) du changement climatique par le biais des nouvelles technologies : exploitation énergies renouvelables (énergies éoliennes et solaires) pour faciliter la pratique de l’agriculture et de l’élevage, l’arboriculture, le maraîchage et la foresterie, ect, grâce à la nappe phréatique
* Un plaidoyer soutenu auprès des Etats afin de garantir la multisectorialité de la nutrition (rôles et responsabilités de tous les acteurs) afin que chacun joue son rôle et assume sa responsabilité et rend compte de ses actions, décisions politiques en rapport à l'exécution des activités auxquelles il participe.
* La synergie d'actions entre projets régionaux dans les politiques publiques sectorielles avec une plus grande implication des populations autochtones et locales concernées.

## [Jenny Wiegel](http://www.fao.org/fsnforum/member/jenny-wiegel)****,**** CIAT, Nicaragua

Please find attached my comments in the provided template.

**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?**

Yes in terms of malnutrition and direct causes.

Underlying problems that hinder food systems to deliver healthy diets are not described. In Central America, issues of availability (what is easy for people to get) and affordability (prince) and ease (facility to prepare) are important factors in household consumption choices as well as cultural and social factors. Traditional diets are seen as habits of the poor and there is large social pressure to change household consumption both at home and out of the home towards more unhealthy patterns.

**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 principles are in general good. There are two areas where they do not comment but could – first it does not put much emphasis on within household parts of the food system ie food production as it relates to energy consumption and waste in cooking, storing and consuming nor technologies or behaviour that are labor saving or waste reducing. This could include also behavior change in restaurants or processed foods that support desired outcomes for individuals. Second, it does not provide any comment on how to prioritize among different food system outcomes or any hierarchy, for example when balancing trade offs between malnutrition and environment, which takes priority in what circumstance? I believe understanding trade offs is important, and minimizing where possible, but if a choice needs to be made, are there principles to guide this? Third, except for the mention of the right to food for all, there is very little emphasis on providing outcomes for the poorest populations. Without this explicitly, the principles could be applied and work for a part of the population while excluding those most marginalized. At some level, certain income groups should have their own means of addressing issues of consumption (recognizing that this is increasingly a concern society wide given costs). It may be that returns on investment lead governments to invest in addressing non communicable diseases in middle and lower middle class at the expense of poorer populations. Is that ok or should there be a principle on this? It is not a simple answer but very important for Latin America.

**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?**

Regulation of retailers is absent as a policy option that can contribute to balance of power within the system, or to favor retailing systems for food and prepared food that deliver desired outcomes in different areas of interest. The unfair competitive practices and advantages of some powerful actors within the system has been documented and often leads to outcompeting their competitors with implications for the food system and its ability to deliver desired outcomes or the ability of the state or market to regulate it.

I think the policy entry point categories are good. Trade offs and what to do about them will be a challenge in this section. Is there a way to help understand which entry points you may want to choose in which contexts or to achieve which kinds of outcomes? Something that guides policy makers towards which entry points to prioritize for what. For example if your focus is rural vs urban populations, profit vs health, or health vs environment how do you unpack the situation and decide what priority is and minimize impacts in the other spheres.

There are major interactions between policies of different sectors but also at different domains ie national vs municipal vs subnational level. This is not discussed but if there is a guide to say which entry points make sense to focus at which level or how to focus each at national vs municipal level that could be helpful.

There are also a number of no brainer policy options that should be flagged, or for which evidence base should be amassed, that allow policy makers to quickly implement options that have low negative and high positive impact, and help to navigate the political obstacles. For example nutritional labeling.

**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 policy-making?**

The private sector, big and small, needs to be part of the conversation and the state needs to govern for best outcomes, not political pressure.

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

You may want to think about guidelines for different kinds of stakeholders. For example what should governments do if they commit to them, which is how this is mostly written. But also what should a private company say a restaurant or retailer do if they want to adhere? What about a school? Or a household/social movement of households? Like the I do not use straws or I do not throw garbage on the street kind of messages and behavior change at scale. Or if I am a municipality or a hotel. I would focus on the actors or groups of actors with the largest impact to be had and think about what compliance would mean for them to make it easy and clear how they can support and sign on.

## Emily Peterson, International Food and Beverage Association, Belgium

Thank you for the opportunity to provide comment on the Zero Draft of the Voluntary Guidelines on Food Systems and Nutrition. I am writing on behalf of the International Food and Beverage Alliance (IFBA), the alliance of 12 of the world’s biggest food and beverage manufacturers who share a common goal of helping people around the world achieve balanced diets and healthy, active lifestyles.

**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?**

Chapter 1 adequately describes the complex crises contributing to malnutrition in all its forms, and we agree that urgent action is needed to address these challenges. IFBA recognizes the responsibility business has to contribute to global health, and we are committed to working in partnership with a wide range of stakeholders to seek collaborative solutions.

**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?**

IFBA supports a systemic and holistic, evidence-based approach to addressing malnutrition in all its forms. We encourage CFS to consider the private sector as a capacity-building partner – alongside other nutrition and food systems actors – while developing upcoming versions of the Voluntary Guidelines.

**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?**

IFBA recognises that food and beverage marketing has an impact on food choices, food preferences and food behaviours, including children and adolescents. We fully subscribe to the [World Health Organization Recommendations](http://www.who.int/dietphysicalactivity/marketing-food-to-children/en/) to reduce the impact on children of marketing of foods high in saturated fats, trans-fatty acids, free sugars, or salt (commonly referred to as ‘HFSS’ products). Moreover, we support the notion that this policy may be implemented through a variety of approaches (paragraph 22): “Statutory regulation is one approach through which implementation and compliance are a legal requirement. Another approach is industry-led self-regulation, which covers whole industry sectors, for example the advertising sector, and can be independent of government regulation”. In order to avoid policy fragmentation, focus should be on the outcome (effectively reducing impact on children), rather than the means (regulation versus co-regulation or self-regulation).

**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 tradeoffs 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?**

Collaboration with industry, as was demonstrated when IFBA announced its support for the WHO package on industrial trans-fat elimination, can deliver public health benefits. Our members are committed to collaborating with all stakeholders to find smart, diverse solutions to global health challenges while creating new and improved nutritional products and smaller portions, empowering consumers to make informed choices, and encouraging others in our industry to take action. Including opportunities for public-private partnerships as an essential component of a whole-of-society approach is key to developing a healthy and sustainable global food system.

As an example of a specific collaborative intervention, IFBA companies have actively self-regulated in the area of marketing to children, in partnership with the World Federation of Advertisers. Since 2009, IFBA has committed not to advertise to children under the age of 12 at all, or only advertise to this age group products that meet common nutrition criteria based on accepted science-based dietary guidance. Beyond this global policy, WFA and IFBA support the launch of responsible food and beverage marketing “pledges” or industry-wide codes prohibiting the advertising of nutritionally non-compliant products to children around the world. To date, these pledges cover 55 markets worldwide.

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

Multistakeholder partnerships are critical to achieving the six Global Nutrition Targets and the transformative change called for in the 2030 Agenda, and IFBA is in full support of Sustainable Development Goal 17 around partnerships for the goals and the UN HLM Political Declaration on NCDs. We support the principles for implementation and monitoring as laid out in Section IV, particularly sections 59 and 61 which recommend platforms for multistakeholder partnerships to achieve improved nutrition outcomes at country level.

## [Julie Brimblecombe](http://www.fao.org/fsnforum/member/julie-brimblecombe-0)****,**** Monash University, Australia

I am hoping that my comments attached here can contribute to the forum.

**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?**

1. In order to support countries to develop voluntary guidelines on food systems and nutrition for global and sustainable food security, it is critical that early in the background and rationale of the CFS voluntary guidelines on food systems and nutrition that the characteristics of a sustainable diet for human and planet health are clearly articulated (more plant foods, less meat, less highly processed and packaged food and drinks etc). Refer to the Lancet Commission report on the Global Syndemic of Obesity, Undernutrition and Climate Change <https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(18)32822-8/fulltext>
2. It would be useful then to describe the five main categories as articulated in section 24 and their related drivers, which impact the functionality of food systems and their ability to deliver healthy and sustainable diets and thus global food security.
3. A description of the outcomes of disruptions to functioning food systems and the creation of non-sustainable food systems which is malnutrition in all its forms and those most affected are those most vulnerable as articulated in section 1, could then follow.
4. The case can then be made clearly to governments on why policies that coordinate actions across sectors and across countries are needed.
5. Our concern is that if the voluntary guidelines are framed around addressing malnutrition in all its forms, rather than building sustainable food systems that provide healthy, affordable, acceptable and safe diets for all while respecting cultures and traditions, that downstream and unfragmented policy action may result.
6. We also support the comments submitted by the FAO Indigenous Peoples Team, PSPD, on the CFS policy process on the development of the voluntary guidelines on food systems and nutrition.
7. As stated by the FAO Indigenous Peoples Team, there is a unique opportunity to highlight the different systems through which humanity has been feeding itself over the past thousands of years and draw from the expertise of the Indigenous peoples of our planet and the small holder farmers in securing global and sustainable food security. As the FAO Indigenous Peoples Team describe this requires framing food security in a biocentric framework rather than an anthropocentric one.

**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?**

1. In section 2.18 – more emphasis on policy to achieve sustainable food systems is needed.
2. A further principle is that policy not only ensures the different dimensions of food security but also promotes and fosters opportunity for civil society to participate in decision-making and policy development.
3. Food security is also connected with issues such as land and water sovereignty and tenure for Indigenous peoples and small holder producers. This needs to be consider in the guiding principles.
4. We support the targeted policy recommendations relevant to Indigenous food systems as stated in the paper submitted to this consultation process through the FAO Indigenous Peoples Team, point 18 (a-g).
5. As stated by the FAO Indigenous Peoples Team, “Indigenous food systems, present important conceptual contributions that have not been included in these draft voluntary guidelines on food systems and that must be considered in order for the guidelines to be complete”.
6. In Australia for example, Aboriginal and Torres Strait Islander peoples represent one of the world’s longest continuous cultures and have knowledge of food systems that they have been custodians of for over sixty thousand years and continue to pass this knowledge through their generations.
7. The role of Indigenous peoples, small holders, alternative retailing (such as farmers markets) in reshaping and promoting food sustainable food systems need to be considered in the guiding principles.

**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 policy-making?**

1. The ideal food system could be informed by the Indigenous peoples of our planet
2. An ideal food system would be one that is in balance with natural resource health
3. In attaining a sustainable and healthy food system, policies will be needed that reduce the availability and marketing of processed foods of poor nutritional value

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

1. These guidelines will be most useful with practical policy examples offered with accompanying descriptions of potential risks and challenges
2. These guidelines will have the best chance of uptake if accompanied by global initiatives to support country specific policies
3. These guidelines will need to communicated to not only policy makers and other key stakeholders including food producers, distributors, consumers and custodians of our natural resources

## [Anne Kepple](http://www.fao.org/fsnforum/member/anne-kepple)****, FAO, Italy****

Greetings,

I am sending attached my comments. It is worth noting that the comments reflect only my personal opinion, without consultation and inputs from my team or division at FAO where I work.

Best,

Anne

**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?**

**To the list of sectors listed under item 12, add environment and planning sectors.**

**Paragraph 15** makes it clear that the document is framed around nutrition as the outcome of needed transformations in the food system rather than environmental, economic and social impacts. Assuming this is a conscious decision, it may be useful to make it explicit.

**Paragraph 16:** Why the “particular attention to target 2.2” of SDG 2? I believe SDG target 2.1, access to food, is equally important, and in fact arguably the target most closely associated with the Right to Food.

**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?**

**Paragraph 20:** I suggest the following edit:

The Voluntary Guidelines are expected to build understanding of the complexity of food systems with the intention to promote policy coherence, provide actionable recommendations, and foster and guide dialogue among different institutions and sectors.

**Paragraph 36:** These guiding principles are no doubt the result of much discussion and negotiation, so I can only humbly offer my comments. Some of them seem to be more actions than guiding principles, for example nutrition education. Another guiding principle to potentially consider is “Shed light on power imbalances: promote awareness of power imbalances throughout the food system that pose challenges to transformations aimed at improved nutrition and environmental, social and economic sustainability.”

**Paragraph 41:** Similarly, I feel “address power imbalances” is missing from this list of “cross-cutting factors”, e.g. issues related to globalization and concentration of markets, foreign direct investment, and the power of multi-national companies.

**Paragraph 43, item h:** I suggest using “nutritious foods” in place of “nutrient-dense foods”, and I favor excluding “bio fortified crops” (which I presume refers to GMO crops) due to lack of consensus on the wisdom of promoting their use.

**Paragraph 46:** This is not my area of expertise, but the two policy-relevant areas seem very limited, especially in light of all the relevant drivers described in the introductory paragraph.

**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 distinction between policy areas and policy entry points is unclear to me.

However, food and nutrition policy governance is key to fostering policy coherence. Ideally, an intersectoral governing body exists composed of empowered representatives of relevant government ministries (Agriculture, Health, Social Protection, Education, Planning) and civil society organizations, as per the example of the National Food Security and Nutrition Council (CONSEA) in Brazil. The CONSEA advised the National Inter-Ministerial Food and Nutrition Security Chamber (CAISAN). Such institutional arrangements promote alignment of sectoral policies and strengthen the link with national government planning and budget processes.

**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 policy-making?**

The institutional arrangement in Brazil, described in the response to Q3, is not new but was very successful, although it has been in legal limbo since a new president took office.

Among the many potential trade-offs to be studied is the possible trade-off between availability of enough nutritious food and environmental sustainability. We are only beginning to understand the environmental impacts of food production, distribution, processing and food loss and waste. However, it is also possible that there are opportunities for synergies – i.e. policies that contribute simultaneously to increased availability of nutritious foods and environmental sustainability.

The discussion of targets and metrics promises to be a challenge. Some of the SDG targets and indicators should be considered, as they are based on valid methodologies and produce indicators that are comparable across countries. But it might be useful to develop a set of recommended indicators that includes internationally comparable indicators as well as indicators that are country-specific and do not need to be cross-country comparable, for purposes of national-level monitoring and policy.

I attended a presentation about a web-based food systems dashboard being developed in collaboration with GAIN, Johns Hopkins University, Michigan State University, University of Michigan, FAO, Tufts University, and University of Washington. A compendium of indicators for monitoring urban food systems policies, developed in the context of the Milan Urban Food Policy Pact, is also expected to be published by the end of the year. FAO’s *Compendium of indicators for nutrition-sensitive agriculture* is also a good reference.

The process of defining indicators is as important as the resulting indicator framework, however; although it may take more time, if the process is characterized by active participation of key stakeholders, the relevance and usefulness of the resulting indicator framework will be increased.

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

The guidelines should be widely disseminated internally in FAO and staff should be encouraged to use them in their work at regional and national levels, helping governments to understand them and apply them in their agriculture, food security and nutrition planning. They should also be broadly disseminated among other development partners, donors, policy communities and civil society organizations.

## Don Syme, New Zealand Embassy Rome

Please find New Zealand’s comments in the attached.

**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?**

The Background and Rationale of Chapter 1 introduction does not adequately reflect the current situation. It fails to link human nutrition and sustainable food systems. The concept of “sustainable diets”, which is addressed in the HLPE report, requires the involvement of health, agriculture and the environment sectors. It also differentiates between “healthy diets”, which by conventional definition are a collection of nutrients independent of their ecosystem, and “sustainable diets”, which by definition link nutrition and sustainable food systems. So-called healthy diets can be created in a food laboratory, and are disconnected to sustainability issues.

The environment sector is not adequately represented in this document. Different stakeholders need to be acknowledged. The role of the environment sector is missing. For example, the work of UN Environment (One Planet Network) and the Convention on Biological Diversity (e.g., the Cross-cutting initiative on biodiversity for food and nutrition), and the Global Environment Facility with the CGIAR on Biodiversity for Food and Nutrition, should be included.

The impact of climate change on the food system is missing from the guidelines. As climate changes, access to food in certain regions will become difficult, and food insecurity due to severe weather events will increase. Consideration of the relationship between climate change and food/nutrition security is needed.

Policy relevant areas in the food quality and safety space does not adequately address issues of contaminants and standard setting.

**Specific amendments**

1. Para 32. “a healthy diet for infants…”

Small amendment to point b) is suggested to align with the WHO recommendations:

b) infants and young children should continue to be breastfed until 2 years of age or beyond

The definition of infant is up until 12 months which necessitates the inclusion of young children in this statement. The statement is that breastfeeding should continue alongside the introduction of complementary foods from 6 months (c ). To state ‘breastfeeding continuously’ could be interpreted to imply that breast feeding is the sole source of nutrition for older infants and young children. In all statements with regards to breastfeeding the recommendation is breastfed for 2 years of age ‘or beyond’ not ‘and beyond’. This has been taken from Reference 18 –healthy diets factsheet. Does not align with the right to adequate food.

Para 45: add in the concept of reducing anti-nutritive factors

b) reduction of fat should be limited to reduction in saturated fat only. Reducing total fat content can lead to substitution with refined carbohydrate which leads to poor outcomes. Also should specify that reductions should be added sugar or free sugar. This is inline with the WHO recommendations.

Para 46. Restrictions should be on the marketing of products high in SAFA, added/free sugar and salt with a focus on those that are of poor nutritional value.

**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?**

KEY CONCEPTS AND GUIDING PRINCIPLES gives a conventional definition of “healthy diets” that illustrates why this concept should not guide the process: it is a collection of nutrients independent of their ecology, and disconnected from sustainability issues. Healthy diets can be created in a food laboratory.

The definition of sustainable diets, which is reproduced in the HLPE report, is tied to sustainable food systems and should be included along with healthy diet, to provide guiding principles. That definition is as follows: Sustainable Diets are those diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources. (FAO, 2010).

Healthy people and healthy planet should be considered as separate guiding principles.

The role of red meat and animal protein is under-represented in the healthy diet discussion, a more balanced approached is warranted given the increasing academic literature on the nutritional value of animal based diets and the necessary role these play in a healthy diet (IPCC, 2019).

**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?**

Key items missing from the list are indigenous food systems (or traditional food systems of indigenous peoples), planetary boundaries, ecosystem services, sustainable landscapes.

**Specific amendments**

43. a) Sustainable and nutrition sensitive agricultural production models

Agricultural models promoting food diversity and food commodities that constitute a healthy diet, protecting agroecosystems through minimizing the use of inputs and fostering regeneration and renewal of natural resources, and adopting innovative and environment-friendly approaches, can contribute to food security and nutrition, improve livelihoods and support environmental health.

Minimizing inputs is not consistent with the high nutritional value of the crops. It should be replace with ‘optimising’ the use of inputs. In many production systems there is a complete lack of inputs (e.g.fertiliser), which contributes to reduced yield and lack of nutrition.

**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 policy-making?**

“New” should not be the operative word. Over time there have been many important policies, initiatives, goals, conventions, treaties, etc., of direct relevance to the development of the Voluntary Guidelines on Food Systems and Nutrition, which should be acknowledged and built upon. Stakeholders in many countries have already endorsed these. Some examples include the following: UN Conference on the Human Environment in 1972, the Code of Conduct for Responsible Fisheries, the Right to Food, the AICHI targets, SIDS Accelerated Modalities of Action (SAMOA) Pathway, etc.

An ideal food system is one that is sustainable across all the wellbeing domains. It is a system that delivers nutritious food that is accessible to all; a system that enables thriving rural communities and rewarding livelihoods. It is a system that generates social and economic prosperity; and it is one that maintains and enhances the integrity of the natural resources on which the other dimensions of wellbeing are built. The sustainability of the food system must be intergenerational; the well-being of today should not come at the cost of the well-being of tomorrow.

In articulating such a vision, it is important to fully acknowledge that agreeing priorities for action across different sustainability goals is a significant challenge. Aligning low resource footprints, low GHG footprints, nutrition security and rural prosperity goals is not straightforward. Tensions and trade-offs will need to be carefully considered. While potential synergies should certainly be identified, we suggest that the sustainable food systems agenda needs to focus on better understanding the trade-offs, and enabling societies to navigate these effectively and equitably.

1. Moench-Pfanner R, Silo S, Laillou A, et al. The Economic Burden of Malnutrition in Pregnant Women and Children under 5 Years of Age in Cambodia. *Nutrients*. 2016;8(5):292. Published 2016 May 14. doi:10.3390/nu8050292 [↑](#footnote-ref-1)
2. Asesor Consejería de Planeación, Administracion y Finanzas. Organization Nacional Indígena de Colombia. Ingeiero Agronomo. Msc Genetica y Fitomejoramiento. [↑](#footnote-ref-2)
3. Asesora en propiedad intelectual. Consejería de Territorio y recursos Naturales. Organización Nacional Indígena de Colombia. Abogada. Especialista en Propiedad Intelectual [↑](#footnote-ref-3)
4. Departamento Administrativo Nacional de Estadistica. Protocolo de Vigilancia en Salud Pública – Mortalidad por y asociada a desnutrición en 5 años. [↑](#footnote-ref-4)
5. Enfermedades seleccionadas como causas de muerte por desnutrición, con base en la Clasificación Internacional de Enfermedades - CIE 10: Anemias por deficiencia de hierro (D50), Anemia por deficiencia de folatos (D52), Otras anemias nutricionales (D53), Kwashiorkor (E40), Marasmo nutricional (E41), Kwashiorkor marasmático (E42), Desnutrición proteico calórica severa no especificada (E43), Desnutrición proteico calórica no especificada (E46), Otras deficiencias nutricionales (E63), Secuelas de la desnutrición y otras deficiencias nutricionales (E64.0 a .9), Trastornos relacionados con la duración corta de la gestación y con bajo peso al nacer (P07) [↑](#footnote-ref-5)
6. DANE. 2005. Censo general de nación. Disponible en: https://www.dane.gov.co/files/censo2005/etnia/sys/visibilidad\_estadistica\_etnicos.pdf [↑](#footnote-ref-6)
7. Poner cita ENSIN 2010 [↑](#footnote-ref-7)
8. Desnutrición crónica: Es de aclarar que la talla refleja el historial o perfil nutricional, o la no satisfacción de las necesidades básicas de alimentación por períodos prolongados. Es así que, los niños y niñas que han padecido prolongados periodos de desnutrición o infecciones recurrentes, son de menor estatura en relación a su edad, muestran bajos rendimientos cognitivos y prolongan más fácilmente a nivel generacional, sus condiciones y necesidades básicas insatisfechas. [↑](#footnote-ref-8)
9. La población indígena según el DANE para 2005 era de 1392623 indígenas, de los cuales el 7 % corresponde a niños entre 0 y 5 años. [↑](#footnote-ref-9)
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145. The obligation of States to protect and respect the rights of Indigenous Peoples means not unlawfully polluting or contaminating water, soil and air with highly hazardous chemicals and toxics. Article 29 of the United Nations Declaration on the Rights of Indigenous Peoples cannot be violated, in regards to the storage of hazardous wastes on the lands, waters and territories of Indigenous Peoples, resulting in the harm or destruction of traditional food sources, ecosystems and habitats, and potentially introducing such toxics into the bodies of Indigenous Peoples, including vulnerable groups. [↑](#footnote-ref-145)
146. FIAN Colombia hace parte de FIAN Internacional, organización que cuenta con el estatus consultivo ECOSOC ante el sistema de las Naciones Unidas. FIAN defiende y promueve el Derecho Humano a la Alimentación y Nutrición Adecuadas, así como los derechos conexos. El capítulo colombiano de FIAN fue creado en 2013 y cuenta con un equipo de trabajo interdisciplinario. En el presente documento, hacemos aportes desde la experiencia de FIAN en Colombia, que tienen relevancia a nivel global en la discusión de los sistemas alimentarios y la nutrición. [↑](#footnote-ref-146)
147. Elaborado por: Juan Carlos Morales González; Hernando Salcedo Fidalgo; Paola Romero Niño, miembros de FIAN Colombia. [↑](#footnote-ref-147)
148. Hemos querido incluir en esta nota como aporte a la consulta en línea, que la noción de “dieta” que proviene de las narrativas médicas, es prescriptiva y no refleja necesariamente lo que el concepto de régimen sí puede aportar. Por tanto recomendamos también considerar la posibilidad de reemplazar el concepto de “dieta” por el de “régimen”. [↑](#footnote-ref-148)
149. Esta noción fue introducida en los ámbitos académicos de la economía y ha sido readaptada para describir la homogenización de estos regímenes a partir del acceso a Productos Comestibles Ultraprocesados como base preponderante de la canasta familiar en países industrializados y no industrializados. Ver: FIAN Colombia, *Perspectivas sobre Derecho a la Alimentación y Nutrición Adecuadas. Tomo I.*, Bogotá, 2018. [↑](#footnote-ref-149)
150. Anotamos aquí los reportados por la OPS en los documentos sobre perfil de nutrientes, a saber azúcar, sodio, grasas trans, edulcorantes, preservantes, colorantes, … Ver: Organización Panamericana de la Salud —OPS—. (2016). *Modelo de Perfil de Nutrientes de la Organización Panamericana de la Salud.* Washington D.C.: OPS & OMS. [↑](#footnote-ref-150)
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152. Con esto hacemos referencia a las formas de construcción, difusión e imposición de saberes y conocimientos que, investidos de una pretendida infalibilidad, estatus y preeminencia científica y discursiva, desprecia o demerita los saberes y conocimientos tradicionales, muchos de los cuales son respuestas adaptativas sostenibles de las personas a sus territorios y ambientes. [↑](#footnote-ref-152)
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