

Comments – Canada

CFS Voluntary Guidelines on Food Systems and Nutrition: Zero Draft

First, we thank the Secretariat for the opportunity to provide comments in writing and for the Chair's reference to the interventions from the 30 May meeting related to poverty, poverty reduction and indigenous-peoples specific situations in her summary of the outcomes.

The draft now includes more explicit reference to **food safety** being a relevant area for policy within food systems, for example paragraph 44 b). As noted in our previous comments (to the Preliminary Draft) we strongly support these changes.

Chapters 1 & 2

In our oral intervention on 30 May, Canada noted the following with regard to chapters 1 and 2:

- A challenge to finding an entry point to discuss the food security and nutrition challenges facing Indigenous peoples is the current draft's failure to better foreground the issue of **poverty**. We noted that a greater focus on poverty throughout the document would open up a space to address issues related to Indigenous peoples – as well as gender, and align the document even more closely with the Agenda 2030.
- More specifically, Canada noted that there is only one reference to Indigenous peoples in the current draft, namely in **paragraph 11** (those most vulnerable to malnutrition in all its forms), and that an additional reference could be made to '**remote**' communities in that paragraph as follows (see bold text in square brackets):
- 11. The most vulnerable to malnutrition in all its forms "typically include those with high nutrient requirements and those who have less control over their choice of diet. This implies particular attention to young and school aged children, adolescent girls, pregnant and lactating women, the elderly, indigenous peoples and local [and rural] communities, and smallholders and rural and urban poor also in consideration of the different types of food systems they live in"
- Moreover, Canada emphasised that Indigenous peoples should be included in the list of stakeholders in para.26 and that the following reference should be included in the draft's guiding principles:
- **Paragraph 36.** These guiding principles are:
a) *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.
- We also mused as to whether the inclusion of the term 'harvesters' (beyond the existing use of 'smallholders and farmers' in the document could include a broader range of activities such as farming, fishing and hunting.

Paragraph 36d) Gender equality and women's empowerment. Promote gender equality and women's and girls' empowerment respecting their rights and considering the importance of creating the conditions for women's strong engagement in shaping food systems that can improve nutrition.

- Moreover, we recommended that the following guiding principle (**para 36d**) with regard to Gender equality and women's empowerment 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 transmission of malnourishment (from mothers to low-birth-weight babies).

- **Paragraph 36 g) Capacity Building**

This concept of Capacity Building is new within this document and it is not entirely clear what is expected with this as a guiding principle. Given that this document is primarily targeted at governments to help design public policies (paragraph 26), further clarity is needed around the intent of this provision.

Additional comments:

- **Paragraph 1:** Move the reference to Sustainable Development Goal 2 ("to end hunger, achieve food security and improved nutrition and promote sustainable agriculture"), currently found in paragraph 16, to paragraph 1, to provide stronger context and direction for the draft.

Paragraph 2: Undernutrition is a major cause of death among children under five while newborns with a low birth weight are more frequently affected by infectious diseases during early life and are ~~more exposed to~~ predisposed to a higher risk of non-communicable diseases.

Paragraph 5: Delete "chronic ~~and~~".

Commented [CD-1]: These children are at a higher risk for developing NCDs later in their lives. See <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5856182/>

- **Paragraph 7:** A stronger reference to climate change, perhaps by moving language from paragraph 43 (i) closer to the beginning of the document will help further contextualize the importance of sustainable food systems.
- **Paragraphs 10 and 11:** These paragraphs should be moved up to the top of the document, to emphasize a focus on "the poorest and most nutritionally vulnerable" (paragraph 10).
- **Paragraph 21:** Add references to "traditions, cultures and ways of life" to the paragraph on the development of sustainable food systems (proposed new language in italics):

- "Sustainable food systems that promote healthy diets are integrally connected with issues related to trade and investment, climate change, biodiversity and genetic resources, *traditions, cultures and ways of life*, among others, which are all addressed in dedicated normative intergovernmental processes."

- **Paragraph 25:** Add references to specific UN instruments, including the United Nations Declaration on the Rights of Indigenous Peoples (proposed new language in italics):
 - "CFS guidance should build on and integrate existing instruments and frameworks for action adopted on these topics within the context of the UN system, *such as the International Covenant on Economic, Social and Cultural Rights, and the United Nations Declaration on the Rights of Indigenous Peoples*, including Member States endorsed guidance and recommendations.

- **Paragraph 3:** 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, 2–8 February 2019, Pages 447-492

In light of the debate regarding 'healthy and sustainable' diets, we would recommend the following:

- **Paragraph 32: Healthy diets**

While some countries definitions of healthy diets may differ, we consider it important to include reference to diets that not only meet macro- and micronutrient needs, but also do not exceed recommended intakes of nutrients of public health concern due to excess – specifically sodium, free sugars, saturated fats, and trans fats. This is currently captured within the WHO definition; however, if the WHO definition is removed, text related to the aforementioned nutrients should be included in some form in the definition.

We would also suggest that inherent in "healthy diets" is the provision of sufficient energy, nutrients and fruit and vegetables. The WHO definition included in Para 32 refers to limits on sodium, free sugars, and SFA.

- See proposed edit to text to reflect language in the reference quoted (ref 18).
 - While the WHO fact sheet that it being referenced says "and beyond", WHO and UNICEF's recommendation states "introduction of nutritionally-adequate and safe complementary (solid) foods at 6 months together with continued breastfeeding up to 2 years of age or beyond. <https://www.who.int/en/news-room/fact-sheets/detail/infant-and-young-child-feeding>.

"[ADD: Advice on] a healthy diet for infants and young children is similar to that for adults, but the following elements are also important:

- a) Infants should be breastfed exclusively during the first 6 months of life;
- b) Infants should be breastfed continuously until 2 years of age **and** beyond;
- c) From 6 months of age, breast milk should be complemented with a variety of adequate, safe and nutrient-dense foods. Salt and sugars should not be added to complementary foods" ¹⁸.

Chapters 3 and 4

Paragraph 41

The sentence "The effectiveness of all of them is dependent on the formulation of nutrition-sensitive policies across all relevant sectors" is a broad statement and not entirely accurate when considering the list of cross-cutting issues included. We suggest that it be revised slightly to state:

"The effectiveness of all of them is **improved with dependent on** the formulation of nutrition-sensitive policies across all relevant sectors"

Paragraph 43 (e) – Diversity of genetic resources

Please consider identifying **innovation** as another benefit of maintaining genetic diversity (i.e. **efficiency, resilience and innovation of production systems**).

Paragraph 43 (k): Add reference to the need to reduce and eliminate contaminants in traditionally harvested foods to paragraph on resilient food supply chains (proposed new language in italics):

"Efforts to adapt or increase the resilience of food supply chains to threats like conflicts, natural hazards, climate change, **contaminants** and global food price volatilities, should include interventions aimed at strengthening access to finance, better forecasting data, **reducing and eliminating contaminants in traditionally harvested foods** and asset creation initiatives such as rehabilitating degraded land and infrastructure building. Similarly, disaster risk reduction and management interventions are key to building resilience and capacity, especially among particularly vulnerable communities."

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 45 (b) – Food processing policies and regulations

Consider the following revision for improved clarity in terms of food content vs intake:

"Also, recommended or mandatory targets or standards have been developed in different categories of food to reduce sodium, saturated fat and free sugars **intake content** to make healthy food choices easier."

"Also, recommended or mandatory targets or standards have been developed in different categories of food to reduce salt, fat and sugar intake content to help mitigate excessive intakes which are risk factors for NCDs"

Paragraph 46 (b) – Supply of nutritious foods

Please consider the following revision for increased emphasis on the rationale for intervention:

"Policies should also consider ways to restrict the marketing of products **that undermine healthy eating, such as foods that contribute to excess levels of saturated fat, free sugars and/or sodium.**"

Commented [CD-3]: General comment: recommend that the nutrients of concern be referenced, throughout the document, as sodium, saturated fat, trans fat and free sugars

Commented [CD-4]: Fat, in general, is not a risk factor for NCDs. Thus, the statement is not entirely correct.

We suggest a positive statement to increase readability.

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 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).

Paragraph 48 – Availability and Physical Access (Proximity)

While the text does a good job of describing limitations on access (food deserts), it could also point more to food swamps. Consider the following addition:

“Unfavourable climatic and geographic conditions, low density of food entry points or limited access to nutritious food, **overabundance of food that undermine healthy eating intentions and behaviours**, lack of appropriate infrastructure...”

Paragraphs 49-50 – Economic Access (Affordability)

The cost of food, which is the focus of this section, is one part of food affordability. Factors that influence the economic resources of the household must also be considered.

49 (b) – Fiscal and pricing policies

The point is made that “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”, however, it’s unclear how taxes will benefit *affordability* of foods when the impact would be to increase the price of taxed foods. Suggest the CFS consider other fiscal policies that may reduce the cost of nutritious foods to increase economic access.

49 (c) – Social protection programmes leading to improved nutritional outcomes

There’s an opportunity to broaden the scope to supports beyond cash or food transfer to include reference to other social and income support programs.

49 (d) Food Waste

Policies to redistribute food are a better fit in the previous section, “Availability and Physical Access”, more than under “economic access (affordability)”. Suggest re-positioning this point accordingly.

Paragraph 51 (a) – Advertising and marketing

Please consider the following addition to cover broader settings:

Furthermore, food environments in schools and in other settings intended for children or where children are generally present can be improved through restrictions...

Paragraph 51 (b) – Transparency of information on labels

Front of pack labelling is only one example of nutrition labelling; others includes nutrient content declaration, nutrient and health claims. Consider the following revision:

"Nutrition labelling on food packaging (i.e. e.g. front of package labelling) through voluntary or mandatory approaches..."

Part 3 – Consumer Behaviour

Paragraph 55

"Nutrition education and literacy play an important role in increasing the acceptability of nutritious and safe foods for healthy diets, and contributing to the progressive disappearing of food taboos in particular when focusing on school-aged children and youth, as well as women and girls in vulnerable groups and communities."

Commented [CD-5]: It's not clear what the reference to food "taboos" means in this context.

Paragraph 55 (b) – National food-based dietary guidelines

While dietary guidelines have historically focused on what to eat, there is a growing trend/opportunity to focus on how to eat within a given social context. FBDG also play an important role as the foundation for policies, regulations and programs that support healthy food environments and healthy eating. Consider the following revision:

"They provide recommendations based on the latest evidence of the composition of healthy diets as well as advice on the social aspects of healthy eating and navigating food environments, adapted to national contexts and available food representing also. This also represents a helpful source of information..." and foundation for policies and regulations in several sectors that can help shift the food environment towards healthy eating. for policy makers in several sectors (i.e., to promote more investment towards healthier and a more diverse range of products).

Paragraph 55 (c) – Nutrition education

The intent of this section is unclear – it includes formal education (e.g., in schools, in universities) and public education (e.g., in communities or as part of community programs and services). Some aspects of public education would employ "social and behaviour change communication". Suggest reconsidering this section, including combining the intent of paragraph (a) with relevant aspects of (c). Paragraph (c) implies that intermediaries receive (and provide) nutrition education, as well, which is important and is a way to implement the principles of food based dietary guidelines.

Consider identifying health intermediaries, e.g. primary care physicians, pharmacists, as another target of nutrition education.

Paragraph 56 a) Evolving food habits

"Global dietary patterns are changing, affecting people in all parts of the world, with both positive and negative nutrition, health, environmental and socio-economic consequences. Urbanization and globalization of the food supply are major drivers of dietary transition and lifestyle changes."

Paragraph 56: There is an opportunity here to add more robust language on Indigenous peoples.

Change text in subsection (b) to read: "Maintaining a diverse range of food cultures is a way to protect traditional diets and knowledge originating from diverse production systems. It helps

preserve *cultural* diversity and *the* identity of several populations, stimulate local economies and local *harvesting* while aspiring to healthy diets."

Paragraph 62

There have been a number of coalitions, notably in the form of Action Networks, that have already been established to support the UN's Decade of Action on Nutrition and care needs to be taken that these coalitions, which could be regional or global in nature, are not duplicating efforts that are underway at other fora. It may be useful to include a reference to avoid the duplication of efforts, similar to that which is included in paragraph 21.