

General comments on the Zero Draft – Voluntary Guidelines on Food Systems and Nutrition

- The **Voluntary Guidelines offer a unique opportunity** to make policy recommendations to decision makers about the different systems through which humanity has been feeding itself over the past thousands of years.
- As indicated in the HLPE Nutrition and Food systems report (Sept 2017) food systems can be grouped into larger classification groups: “Traditional Food systems; mixed food systems; modern food systems”. Although the wording for these definitions could be misleading, for instance modern food systems are associated with processing and packaging, the definitions of these groups offer a wide spectrum of ways of producing food. **These three definitions characterize food systems in relation to market and processing mainly.**
- In November 2018, FAO with the Fund for the Development of Indigenous Peoples of Latin America and the Caribbean (FILAC), the United Nations Permanent Forum on Indigenous Issues (UNPFII), the United Nations Educational, Scientific and Cultural Organization (UNESCO) and the Indigenous Peoples’ Centre for Documentation, Information and Documentation (DOCIP). Bioversity, IRD, TIP organized the **First High Level Expert Seminar on Indigenous Food Systems** in collaboration with Bioversity International, IRD, The Indigenous Partnership for Agrobiodiversity and Food Sovereignty (TIP), and CIFOR. **The main outcome of the High Level Expert Seminar is the creation of a Global Hub on Indigenous Food Systems**, which hub will be an important contributor about indigenous food systems issues to relevant forums and international ongoing processes and to influence policy makers and researchers through evidence for them to incorporate indigenous food systems in their work.
- **Within the present context of climate crisis or climate change**, it is pertinent to look into the indigenous food systems contributions given the sustainability that they have proved by providing food over hundreds of years.
- **Indigenous Food Systems present a set of characteristics that set them apart** from traditional, mixed and modern food systems.
- Indigenous food systems differ from the traditional, mixed and modern food systems in the fact that their main characteristic is that they are **not anthropocentric but biocentric**.
- **Biocentrism** has several definitions in ecology and in resource management but it could be summarized as an ethical approach that holds that all life deserves equal considerations and has therefore rights of existence and standing. **Biocentrism embodies the cosmogony of indigenous peoples** across the world and can be witnessed in the different ceremonies and rites, many linked to festivities and food practices. This has been highlighted in several documents as the Encyclical letter of Pope Francis (Laudato Si 2015), Harmony with Nature, note by the UN Secretary-General (2015) and the Final Report of the High-Level Expert Seminar on Indigenous Food Systems, held in FAO Rome in 2018. From this Biocentric perspective, **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.
- There are **more than 370 million indigenous peoples** living in 90 countries in 7 sociocultural regions of the world, grouped into 5000 different groups and speaking more than 4000 distinct languages. If grouped together in a single state, it would be the third most populous state in the world.
- Most Pastoralists and nomadic peoples consider themselves indigenous peoples. Depending on the source, pastoralist range from **180 million to 500 million** in the world as acknowledged by the Pastoralist Knowledge Hub.

- Coastal Indigenous peoples, several of them nomadic are estimated in **more than 30 million** from the Arctic to the South Pacific.
- **Indigenous Food Systems** contributions are therefore relevant since they provide insights into how millions of peoples have been feeding their communities until now. Some of these contributions are shared across other food systems that have also survived for hundreds of years and therefore proved to be sustainable, resilience and adaptable. These systems do not rely only on production but also on harvesting, fishing and hunting, activities that depend largely on the health of natural resource base.
- **The main conceptual contributions** of indigenous food systems that are not included in the voluntary guidelines nor are part of the elements under the three broad food systems groups considered (traditional, mixed, and modern) are:
 - Food is not produced, often is generated: new terminology needed for food systems.
 - The generation of food is not done by humankind, instead is provided by the well-functioning of the natural resource base and its biodiversity as well as their interactions in the environment.
 - The systems generate food following seasonality patterns, which implies food diversity and heterogeneity of sources of food in the diet consumed.
 - Indigenous food systems understand food and medicine as one: Nutrition is part of the food generated and not exogenous.
 - Indigenous food systems often combine several food generating techniques from fishing to hunting together with harvesting and itinerating planting in the forest.
 - Indicators raising from the health of the environment in which the food is generated are a good proxy for the new terminology and metrics needed to measure sustainable food systems: instead of Yield and Production, variety and micronutrient richness per unit of surface
 - Indigenous food systems often rely on energy sources from within the system and not from outside: More energy neutral when compared with traditional, mixed and modern food systems
 - Capacity to broadening the existing world narrow food base: indigenous food systems rely on herbs, shrubs, grains, animals and fish, some of which do not have a scientific name. Indigenous food systems are broad in terms of foods consumed that are generated by the system. These foods are intimately linked with bodies of traditional knowledge and indigenous languages that through observation, have identified the nutritious characteristics and qualities of the different food items.
 - Food is generated through territorial and landscape management practices that have been fine-tuned over centuries of ecosystem observation. These practices are framed into systems of indigenous knowledge that are transmitted orally by intra and inter-generational practices.
 - The Knowledge systems of indigenous peoples do not differentiate between food, medicine, environment, culture and spirituality. Everything is integrated into one and the health of one element in the system affects the rest.
- **A different approach to food and food systems requires different policy recipes.** While markets are increasingly gaining importance for indigenous peoples and several of their foods have been labelled by the marketing experts as “super foods” (quinoa, amaranto, stevia, maca), indigenous food systems require a set of specific policies that are more linked to their biocentrism and management of the territory than to the market aspects.
- **Targeted policy recommendations relevant to Indigenous Food systems:**
 - Policies and legislations to improve the recognition of the **collective rights of indigenous peoples and pastoralists**: Most of the landscape and territorial management practices that have resulted in varied indigenous food systems across the world, result from the

collective rights of indigenous peoples to their communal lands and territories, often based on customary practices. These rights are at peril today due to the pressure from extractive industries, commercial livestock and agriculture practices and deforestation across the world. The situation is compounded by the lack of respect of indigenous peoples to Right Prior and Informed Consent as enshrined in the 2007 UN Declaration of the Rights of Indigenous Peoples and ILO 169.

- **Policies integrating interculturality:** In those countries where, interculturality has been introduced in schools and health centers the results have been promising. Indigenous Peoples treasure their foods and practices and whenever they access school feeding often indicate that the foods they are given are not part of their culture nor of their traditions. Interculturality calls for a review of the curricula of different institutions affecting food habits from early stages, from the hospitals and medical dispensaries to the schools, through universities and public institutions. Malnutrition often starts in the schools where the habits are framed or deframed.
- **Landscape and territorial management legislation and policies:** Indigenous Food systems cannot thrive without very specific landscape and territorial management practices that need to be protected and enabled. Unfortunately the trend today is the opposite. The clearest example is the protection of emblematic biodiversity areas, where one of the first measure when declaring it a protected area is to remove the indigenous peoples that lived in it and help preserve that Bioversity.
- **New energy policies:** Mixed and Modern agriculture systems rely heavily on different subsidies to the energy and resources used along the chain from the production, transformation and marketing of the food produced to the distribution. In these systems from water to inorganic fertilizers, from fuel to packaging, subsidies are interlinked with the final consumer price. The subsidies are both direct through state policies as well as indirect in terms of externalities caused by the system that are absorbed by the tax payers of the country (packages turned into garbage that are not recycle/reuse by the food commercialization/transformation company responsible in the first place to use them).
- **Dedicated Research:** Research centers and universities have overlooked indigenous food systems. Only recently with the interest on superfoods some research centers have started to look into the plethora of foods generated by indigenous food systems that never made it to the commercial food systems. Indigenous food systems have the capacity to broaden the available food base through nutritious foods, however dedicated research, involving the communities is needed.
- **Policies and legislation that guarantee the rights and Intellectual property of indigenous peoples over their seeds and foods:** Over the years, the experience of indigenous peoples with researchers having access to their food systems has been not satisfactory. There are several examples of scientists benefitting of indigenous peoples knowledge over their foods. The case of Stevia is a known one. It is important to devise policies that guarantee the rights and intellectual property of indigenous peoples over their knowledge about the generation capacity of food in their systems and their seeds.
- **New metrics and indicators:** Unless we change the terminology and approach it will be difficult to come up with sustainable food systems that provide nutritious food for humanity. New terminology need new metrics and indicators. These indicators could be developed together with Indigenous peoples since their way of looking at food is significantly different from the three main categorization of food systems: traditional; mixed and modern.
- The incorporation of “**nutrition education**” in the “extension services” which focuses primarily on production practices - this can contribute to shift the production patterns towards the

production of crops with high nutrient density and crop diversification – with positive impact on nutrition and economic outcomes.

- Farmers incentives to shift their production patterns towards the production of high nutrient density crops and crop diversification – policies and strategies linking farmers to institutional procurement (e.g. school feeding programmes, national food reserves, etc.) will incentivize farmers to invest in the production of high nutrient density crops that will result in better nutritional and economic outcomes.
- **Agroecological approaches** can offer great opportunities to link sustainable food production and systems to enhanced levels of nutrition. In this line, we would like to see agroecology included in the Voluntary Guidelines. We've prepared some points regarding these linkages.
 - **What is agroecology?** Agroecology is an integrated approach that simultaneously applies ecological and social concepts and principles to the design and management of food and agricultural systems. It seeks to optimize the interactions between plants, animals, humans and the environment while taking into consideration the social aspects that need to be addressed for a sustainable and fair food system.
 - **Agroecology and diets** Agroecology promotes local, stable and diverse diets with year-round integrated production of diverse, nutritious food, since it is based in diversified, resilient, and sustainable production systems. Farms and ecosystems managed through agroecology contribute to ensuring the four dimensions of food security: availability, access, stability, and utilization, which lead to reducing rural poverty, enhancing resilience and promoting local development.
 - **Agroecology and biodiversity** Agroecological systems enhance biotic diversity, minimize external inputs and improve environmental conditions through higher nutrient availability, a range of habitats, and increases in soil organic matter and soil structure.
 - **Agroecology and local markets** Agroecology seeks to reconnect producers and consumers through a circular and solidarity economy that prioritizes local markets and supports local economic development by creating virtuous cycles, through which nutritious qualitative food is exchanged and consumed locally.
 - In this line, agroecological approaches show potential for addressing nutrition through multiple pathways and link sustainable food production and systems to enhanced levels of nutrition, while ensuring human and environmental health.
 - We would like to know if the Guidelines plan to provide further guidance on their implementation, for example addressing what type of production systems have higher impacts on nutrition levels. We also suggest to include the key Ministries that need to be involved, (e.g. Agriculture, Livestock, Environment, Health, Education).
- In general, the reference to **food safety and quality** are rather poor and not at the right level. We are left a bit uncertain on how best to address it, so we are making a few proposals below, that could be combined, or one could do a selection of these. It may be helpful to **separate the concept of food safety from the concept of food quality**. While the latter is often negotiable and often marked by consumer preference, the former is a prerequisite to achieve human development: if it is not safe it is not even food. When food is not safe, nutritional goals CANNOT be achieved. Without food safety, there will be no food security. We believe that this distinction is critical, yet not firmly established in the voluntary guidelines, as food safety and quality are always mentioned together confusing the two and ignoring the fact that food simply must be safe for any nutritional goals to become achievable.
- **Healthy ecosystems enable the survival of healthy people.** Two recent major global assessments of biodiversity both highlight the importance of biodiversity for nutrition, and the deterioration of biodiversity worldwide. According to the recently released global assessment report of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), "The deterioration of nature and consequent disruption of benefits to people has both

direct and indirect implications for public health and can exacerbate existing inequalities in access to health care or healthy diets.” FAO’s recently launched State of the World’s Biodiversity for Food and Agriculture points to the role of changing diets in driving biodiversity loss: “changes in dietary preferences have had a largely negative effect on biodiversity for food and agriculture, with an increasing emphasis on meat-based diets and the use of a narrow range of major cereals (maize, wheat and rice).”

- Biodiversity is an important key to reshaping food systems to make them more healthy and sustainable because it contributes to **all three pillars of sustainability**: economic, social and environmental, as well as to cultural dimensions.
- There is growing evidence of the important contribution of **biodiversity to healthy and sustainable diets** through multiple pathways. An understanding of these pathways is necessary for providing sound policy advice, including through the Zero Draft (where biodiversity does not appear sufficiently):
 - **Biodiversity contributes directly** to human nutrition. For instance, the nutrient composition of different species and varieties provides a range of essential micro-nutrients, and wild food are an important source of nutrition in many countries and particularly during the lean period.
 - **Biodiversity indirectly contributes** to nutrition and sustainable food systems by enabling sustainable production (for example through soil microorganisms, pollinators, and beneficial insects) and securing the natural resource base that is needed for long-term food security and nutrition. It also contributes indirectly by providing cooking fuel.
 - **Biodiversity can provide added income** for producers by reducing the use of costly external inputs and replacing them with ecosystem services (e.g. relying on beneficial insects rather than using pesticides). It can also enable producers to access advantageous markets, for example those for specific varieties and breeds, and also increasingly for wild foods.
 - Since anti-microbial agents affect the composition and diversity of the human microbiome and thus the development of obesity and NCDs, increasing biodiversity reduces the need to use antimicrobials and therefore has indirect benefits for obesity and NCDs.
 - The direct and indirect contributions mentioned above require not only the use of specific species or varieties/breeds, but also the conservation and sustainable use of well-functioning ecosystems (i.e. at the landscape/seascape level).
 - **Biodiversity forms the basis of diets** and therefore provides a basis for social and cultural cohesion and exchanges which can benefit nutrition.
- Based on this understanding of the multiple contributions of biodiversity, the Zero Draft should provide guidance to governments on the policy issues that need to be addressed **to support the important, multiple contributions of biodiversity to healthy and sustainable diets and sustainable food systems**:
 - Policies and research (including traditional and local knowledge) are needed that support product diversification and integration of cropping, livestock, aquaculture, and forestry. Objectives should include promoting the dynamic management of biodiversity and use of local and traditional crops and livestock breeds by producers and investing in smallholder family farmer-led training and knowledge sharing related to biodiversity, such as the Farmer Field Schools and the peasant agroecology schools.
 - Research and policy must also focus on how to make diverse, fresh foods more affordable and appealing, including through transport, storage and market development.

- Policies are needed to promote healthy diets, which would act as an incentive for the conservation and sustainable use of biodiversity (e.g. FBDGs should promote the use of local biodiversity)
- Different types of markets impact biodiversity in different ways, for example commodity markets tend to promote a homogenization of species and varieties/breeds through strict requirements of uniformity. Policies should promote the strengthening of markets that promote biodiversity, such as short food supply chains and public procurement schemes and food safety regulations that are adapted to these markets. Countries should identify market barriers to greater integration of biodiversity in agricultural production systems and then develop policies to counter them.
- Policies are needed to support raising consumer awareness of the benefits of agroecological products, including nutritional quality and health
- Given the need to promote sustainability in food systems, it would make sense to highlight the importance of sustainability in the title of the document, by naming it “Voluntary Guidelines on Sustainable Food Systems and Nutrition”
- **Complementary and coherent implementation of CFS adopted Voluntary Guidelines**
 - The Voluntary Guidelines on Food Systems and Nutrition represent a great opportunity to complement international instruments that have been previously endorsed by the CFS, therefore the draft could explicitly indicate that their implementation should be complementary and consistent with other international instruments in order to support policy coherence.
- **Explicit recognition of international law and ensuring coherence and complementarity to international instruments, tools and policy products**
 - The Voluntary Guidelines on Food Systems and Nutrition should begin by clearly laying out the international normative they fall within. They should not limit to making reference to the Declaration of the ICN2, but should ensure adherence to international human rights standards and principles. Following the example of previous Voluntary Guidelines adopted by the Committee on World Food Security, the Voluntary Guidelines on Food Systems and Nutrition should include **explicit reference to international law and standards that are relevant to food systems and nutrition**, clarifying that those international instruments are binding for States that have ratified them. Key international treaties that are particularly relevant for the scope of Voluntary Guidelines, include: the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, the Convention of the Rights of the Child, the Convention on the Elimination of all forms of Discrimination Against Women, the International Code of Marketing of Breast-milk Substitutes, and World Food Summit. They should clearly state at the beginning that the build on previously endorsed, adopted, agreed Guidelines and Principles of which they complement and expand content. Examples of how Preambles and Prefaces have been drafted, can be found in all the other Voluntary Guidelines and Principles (the Right to Food Guidelines-RTFG, the VGGTs, the Small-Scale Fisheries Guidelines-SSFG, the RAI Principles, the CFS-Framework for Action) endorsed or adopted over the past decade and a half.
 - **Clear and explicit reference should be made to previous CFS guidelines** to ensure policy coherence, hence complementarity and non-duplication. The Guidelines should feature substantive and frequent cross-references to other CFS guidelines, throughout the main text. Relegating such reference to a single footnote is not sufficient (see footnote 21 corresponding to para. 40). There should be clear and explicit mention in the Preamble (as per comment 1.a), but also the Objectives and Nature and Scope, as well as in Key

Concepts and Guiding Principles. Please see how other Guidelines have addressed this complementarity.

- **The definition of the right to food should be expanded.** FAO can support by providing language to this end.
- **A human rights-based approach to nutrition**
 - The Voluntary Guidelines on Food Systems and Nutrition should explicitly mention the important role of a human rights-based approach to food systems and nutrition. More specifically, the Voluntary Guidelines should highlight that:
 - *Nutrition is anchored in the international human rights normative framework*
 - Nutrition is both a component of the right to adequate food, as established in Article 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the right to the highest attainable standard of health as established in Article 12 of ICESCR.
 - *Obligations under international law*
 - Applying a human rights-based approach to food systems and nutrition implies legal obligations for States, but also legal responsibilities for private actors including agri-food companies.
 - *Purpose of food systems*
 - In compliance with international law, sustainable food systems contribute to fulfilling human rights, and in particular the **right to adequate food** and the **right to health**.
 - Sustainable food systems also contribute to other human rights such as the right to education and the right to work, among others.
 - *Principles for policy implementation:*
 - Human rights principles are key to improve sustainable food systems: The principles of non-discrimination, transparency, the rule of law, accountability, and participation should be explicitly mentioned.
 - Sustainability (including the economic, social, and environmental dimensions) could be one of the principles for policy implementation.
 - *Women's rights:*
 - Women very often suffer discrimination related to breastfeeding while nursing in public places or at work. The Voluntary Guidelines should emphasize the protection of women's right to breastfeed not only to protect children's rights, but to protect women's rights and to promote women empowerment. Ensuring the protection of maternity leave through national legislation should also have a stronger emphasis.
 - Policies on food and nutrition education should address the entire household and not particularly women as caregivers. Men -and other adult members of the household- also have responsibilities related to food and nutrition education vis à vis children. Policies addressing food and nutrition education should not only address women as a direct figure associated with children, but should rather address the household in order to achieve equality between men and women.
 - *Focus on the most vulnerable:*
 - Applying a human rights-based approach to food systems implies a focus particularly on women, children, minorities, refugees and internally displaced persons, as well as on other groups that may be subjected to marginalization and discrimination.
 - *Social Protection:*

- Social protection measures to improve nutrition should have human rights underpinnings that are embedded in legislation to avoid discrimination and to ensure that decisions are grounded in law. In the context of social protection, administrative remedies and recourse mechanisms should be available to redress eventual human rights violations, and targeting measures should follow reasonable, objective and criteria should be transparent.
- **Universality and inalienability; indivisibility, interdependence, and interrelation with other human rights**
 - The Guidelines should therefore speak to all duty-bearers and rights-holders, and just like the RTFG and VGGTs, SSFG and CFS-FFA should be consistent with, and draw on, international and regional instruments, including the SDGs, that address, not just the right to adequate food, but all fundamental human rights that impact food systems and nutrition (e.g., the right to decent work, the right to social security, the right to adequate housing, the right to health, the right to education, the right to water and sanitation, right to information, etc.) **These human rights make specific reference to fundamental policy areas which are key to the sustainability of food systems, healthy diets, and adequate nutrition: food security and safety, loss and waste, marketing and labelling, social protection, gender, decent work, and other socio-economic and cultural components which, by increasing access to, can greatly influence food systems and nutrition.**
 - Specific topics, such as food loss and waste, food fortification, food affordability and labelling have many different dimensions and implications, it would be important to address them from a socio-economic and cultural standpoint to increase sustainability. We have produced an exploratory study that for instance shows how food loss and waste can impact the realization of the right to adequate food.
- Adherence to **human rights principles**
 - Clear principles of implementation should be stated, as essential to contribute to sustainable food systems: **participation, accountability, non-discrimination, transparency, human dignity, empowerment and equality, and the rule of law.** These are also cross-cutting factors discussed in para. 41 and should be strived upon and repeated throughout the text as to ensure the realization of the right to food.
- Focusing on the **most vulnerable groups and individuals** (expanded comment on the principles of participation, human dignity, empowerment, equality and non-discrimination) and emphasis of the issue of access
 - We can see that numbers of hungry people in the world are today higher than when the General Comment 12 was adopted in 1999. The Committee at the time already *'observed that while the problems of hunger and malnutrition are often particularly acute in developing countries, malnutrition, under-nutrition and other problems which relate to the right to adequate food and the right to freedom from hunger also exist in some of the most economically developed countries. Fundamentally, the roots of the problem of hunger and malnutrition are not lack of food but lack of access to [adequate] food, inter alia because of poverty, by large segments of the world's population.'* Meaning, there are **important social and cultural considerations that are key to understand these issues, should drive the structure and logic of the text.** People's malnutrition is linked to people's social and cultural status in societies, as well as geographical location, economic power, access to resources, etc. The most vulnerable people in society, nationally and globally, will always lack behind, if we do not start to openly acknowledge that the issue lies within their socio-economic and cultural status (root causes of malnutrition) and how that determines their access to adequate food.

- The Voluntary Guidelines on Food Systems and Nutrition hence, should emphasize the importance of **focusing on the most vulnerable groups and individuals in food systems**. Food Systems can be traditional, modern, or mixed, and the types of vulnerabilities that can be found are incredibly vary and depending on a multitude of economic, social and cultural contexts. This includes women, children, disabled, youth, indigenous peoples, small-scale farmers, fisher folks, etc. Focusing on the most vulnerable groups and individuals helps addressing the root causes of malnutrition and can be key to identify where but most of all how policy action can be most effective and sustainable. Previous Guidelines (the Right to Food Guidelines, the VGGTs, the Small-Scale Fisheries Guidelines, the RAI Principles) all offer insight on how this particular challenge has been addressed and should be a prominent element in the guidance provided.
- **Governance, policies and legal frameworks**
 - While the Zero Draft of the Voluntary Guidelines is comprehensive in scope, issues related to governance could be strengthened.
 - When appropriate, the Voluntary Guidelines should mention policies and legal frameworks since policy options generally have legal implications.
 - The Voluntary Guidelines should explicitly mention the importance of policy coherence as it relates to budget allocation.
 - The Voluntary Guidelines could also strengthen the role of effective institutions and multisectoral coordination mechanisms for improving policy coherence.
 - The Voluntary Guidelines should further emphasize the importance of the rule of law for effective governance.
- **Policy areas that could be further supported through legislative measures**
 - The Zero Draft of the Voluntary Guidelines on Food systems and Nutrition could give greater emphasis to the role of legislation as suggested below:
 - *Food supply chains (production systems):*
 - Legislation as a key instrument to support small farmers and rural producers organizations so that farmers can sustainably access formal markets (access to resources, access to credit, access to insurance, among others)
 - Legislative measures for biodiversity protection including the protection of a diversity of varieties to contribute to dietary and cultural diversity.
 - Legislation as a key instrument to ensure that the investment in agriculture is done responsibly, i.e., does not cause harm to the environment, or cause water and land scarcity, or damage biodiversity, or violate legitimate tenure rights for example.
 - Legislative measures to protect the environmental impact of food packaging (packaging regulations, waste management).
 - Compliance with food safety legislation and applying good agricultural practices should be ensured from production to consumption (from farm to fork). Specific measures should be promoted to support farmers in applying good agricultural practices and food safety requirements according to national legislation and international standards. This is particularly important in subsection f) linking farm to school.
 - *Food environments:*
 - Legislation should have a more prominent role regarding the implementation of the International Code of Marketing of Breast-milk Substitutes and the WHO recommendations on the marketing of foods and non-alcoholic beverages to children.
 - Children's' right to adequate food and children's right to health should have greater emphasis in this specific section.

- Legislation should be mentioned as the most effective way to reduce the impact on children of marketing of foods high in saturated fats, trans-fatty acids, free sugars or salt to children, and restrict marketing of these foods to other groups. According to WHO recommendations, legislative measures should aim to reduce both the exposure of children to, and power of, marketing of foods high in saturated fats, trans-fatty acids, free sugars or salt. In particular, legislative measures should be mentioned as a recommended instrument to ensure that settings where children gather are free from all forms of marketing of foods high in saturated fats, trans-fatty acids, free sugars or salt. Such settings include, but are not limited to, nurseries, schools, school grounds and pre-school centres, playgrounds, family and child clinics and paediatric services and during sporting and cultural activities that are held on these premises (WHO Recommendation 5)
- Nutritional standards for school meals should be encouraged to be mandatory and to be applied in a consistent way through policies and legislation for food procurement (policy coherence).
- Commerce licensing could be mentioned as a regulatory measure that municipalities can use to allow or restrict certain categories of food businesses in order to allow space for healthier food options. This is equally important in urban and rural areas.
- Ensuring **monitoring and accountability of the Voluntary Guidelines**
 - An expanded section on implementation, monitoring systems and accountability mechanisms, with specific guidelines on the different roles and responsibilities of different stakeholders would be not only welcome but necessary. Albeit voluntary, these Guidelines must make specific reference to international frameworks, normative, principles and tools already negotiated, adopted, or which States are Party of. This is necessary not only from a legal perspective and ensure legitimacy of these Guidelines, but also from a perspective of technical coherence and complementarity with other CFS and FAO products which strive to promote accountability across the board and have guidelines regarding specific stakeholders. The Guidelines are currently silent on monitoring in the Section devoted to this issue (Section IV); the Guidelines must cover the **full range of actions to be taken by Governments and other stakeholders (the Guidelines are all based on a multi-stakeholders approach and must incorporate the breadth of roles and responsibility each actor plays in the food system) at the national level, regional and global levels in order to build an enabling environment for the progressive realization of the right to adequate food, which includes freedom from malnutrition.** Please see how previous Voluntary Guidelines are providing such policy guidance in a comprehensive manner, which in fact has evolved in the past 15 years:
 - i. Right to Food Guidelines' 5, 6, 15, 16, 17, 18, 19 and Part III
 - ii. VGGTs Part 2 and 7
 - iii. SSFGs' Part 3, Guideline 13
 - iv. The RAI Principles' Principle 10 on accountability and entire section on Roles and Responsibilities of Stakeholders
- **Inclusive approaches to Food Safety and reduction of food waste.**
 - There is evidence that in many countries food safety policies don't consider the needs of the most vulnerable groups, privileging the export and/or well-off sectors, creating a dual reality where most vulnerable groups don't enjoy safe food and are constrained to the informality. It requires not only reviewing the food safety policy approaches but also

investing in developing the capacities of small producers and local governments, particularly in rural areas and slums districts.

- Reduction of food waste can be achieved in many ways, and redirecting some potential food waste to low income consumers and vulnerable groups may help to facilitate access to food at the same time that food waste is reduced, however if policies emphasize this way it could undermine dignity of vulnerable people and nutrition outcomes, ie. the role of the most vulnerable is not to eat the leftovers of the riches, and it would be difficult to access to a healthy and balanced diet if they rely on the products which are close to expire date which may vary every day.
- **The issue of the microbiome, the impact of agriculture and food technologies on it, and the influence of microbiome alteration on nutrition, health and behaviour.**
 - We feel that this emerging issue is missing. It has a lot of implications from a rtf perspective, even if this has to be considered and emerging issue and additional evidence would be required it is important that the guidelines incorporate it because
 - i. Evidence shows that the extensive and intensive use of antimicrobials, pesticides and other chemical products is modifying the composition of human microbiome but also soils and waters microbial diversity, the issue is wider than antimicrobial resistance
 - ii. Changes in microbiome affect the metabolisms and the nutritional outcome
 - iii. Changes in microbiome affect the mood and consumption patterns (in that case consumer behaviour would not be only it's own responsibility and information would not be enough)
 - iv. This affects all groups of population, however the most vulnerable people will be more affected by those factors as they cannot afford healthier alternatives which are more expensive.
 - It would be important at least to introduce this issue making the connection to the different point of the food chain (production, processing, ...) and indicating the need of additional research as part of national strategies and the convenience of revisiting regularly the policies to assess the implications of new evidence in this matter on adequacy and affordability of food with particular attention to the most vulnerable groups.

Specific comments on the Zero Draft – Voluntary Guidelines on Food Systems and Nutrition

- **Agroecology** could be better integrated in the following paragraphs: Para. 43, a), b), c), e), f), h), i), k).
- **Biodiversity** could be better integrated in Parts 1, 2 and 3 of the Zero Draft, and especially in Part 1, which should recognize that sustainable agriculture relies on biodiversity and ecosystem services.
- Rename session 3, part 1 "Food supply chains" with "Production systems and food supply chains". We are aware that food production is part of the concept of food supply chains. However, we feel that the contribution played by sustainable production systems towards nutrition is an important one, that needs to be stressed. How and what food is grown can play a significant role in consumers' dietary choices. The session largely focus on this aspect, so it would be good to have it on the title.
- Regarding part 1/ Food supply chains, where **food safety** is addressed only at handling/storage and distribution step, it is incredibly reductive. Therefore:
 - Para 27: Perhaps "**Food chain**" would need to be explained in the key concepts concerning food systems and nutrition. The guide presents "food supply chain" but this do not include the consumption, so it is not completely "farm-to-fork", but then it does contain "consumer behaviors", which makes it appear inconsistent
 - Para 32 – **safe food** shall be added to the definition of "Healthy diets" – now included only in the definition of healthy diets for infants and young children.
 - Para 36 on **guiding principles**. In order to be consistent with the recommended guiding principles related to holistic approach and policy coherence, food safety shall be better integrated and this can be done in the bullet e): Nutrition **and food safety** knowledge and awareness (*if it's no safe, it is not food [we would even suggest to highlight these words]*).
 - In Para 42 (chapeau) a good reference to notion of **food control systems** (as named and defined by Codex ensuring food safety and fair practices in the food chain, i.e. quality as corresponding to what regulations are requiring) that have a **food chain approach** (i.e. at each of the steps described in part 1) would be relevant. If there is enough space to further develop the notion, we could maybe avoid repeating it at each stage of the chain (para 43, 44, 45 and probably 46). In that case I think we would like to flag that in addition to the whole food chain approach, the **preventative approach** (that avoids being obliged to discard food therefore negatively impacting of food availability, and economic resources of food chain operators, in particular the small ones); the need for national authorities to adopt a **risk based/evidence based approach in policy making as well as in implementing controls** (to maximize benefits for public health and positive impact on the fairness of markets, while avoiding unnecessary supply and market disruptions) taking into account relevant technical, environmental, social and economic factors would be necessary .
 - Para 43f Linking farm to school. The current statement "**applying hygienic practices in the processing and packaging of foods**" we find is too limited and should be expanded to the entire food supply chain. If possible this section should draw upon the recently published corporate **FAO School Food and Nutrition Framework**. Citing from the chapter on food safety (p.17) "In order to protect schoolchildren and adolescents from food-borne disease, it is necessary to identify, assess and manage the risks and communicate information about these food safety issues to all stakeholders along the supply chain. FAO's approach to school food and nutrition promotes a risk-based framework to the supply chain for school food, embedded in a conducive food control environment."

- Para 44: While we agree that food safety and quality are important parameters to consider under the section “Handling, storage and distribution”, **quite a large number of food safety concerns can only be controlled at the time of agricultural production and food manufacturing on the one side and/or the final food preparation step at the other end.** In addition policy considerations) and should not be limited to “naturally occurring toxins” only. Restricting food safety to ‘Handling storage and distribution’ only is too restrictive and does not allow for sufficient food safety management. In this regard we would like to ask to address at least some of these aspects also in para 43 (unless we cover this well in para 42, in sufficient details). It is unclear to us why AMR came out so strongly, while there were no other refs to food safety were made under paragraph 43. Please note that while the **operators** (or food handlers) should adopt **good practices** (we rather would not say scientific/risk based as is currently written); while the **authorities** have to adopt evidence and **risk based policies and approaches in food control**.
- Para 45: the reference to **food processing policies** is a bit misleading to me at least. It is not clear whether this is considered as a processing issue, more as a formulation of product and eventually a “nutritional quality” issue. However, if it is intended to mention food processing as a step, then safety aspects of standards should also be mentioned. In general, the technologies are referred to in a fragmented way (only for processing and packaging), while in the meanwhile new technologies are relevant along the food chain, including food production and food safety control.
- Regarding part 2/Food environments, we struggle to connect the intro para (47) with the sequence of subheadings, and the one on food safety and quality and safety is particularly narrow. If we want this food safety subsection to remain under part 2/Food environments, there are various options, taking into account with what we were proposing above (para 42 and subsequent). Maybe under part 1 the document could be more “technical” (food control speaking) whereas in this part this part 2 it could elaborate more on the interactions between food safety and food security, with regard to improvement of the “utilization pillar” of food security (for the consumption side); but also availability/access and stability pillars though efficient supply chains; avoid disruptions in the food chain, provide economic development opportunities to stakeholders involved in the food chain.
 - It is not completely clear to us why the **“traceability” component** is granted such high visibility while it is simply just one of many necessary instruments;
 - Para 52: the **list of food hazards** appears to be rather arbitrary and exclusionary, it misses completely the physical hazards through the presence of foreign objects that can be present in agricultural products (e.g. pieces of bone, metal, wood, etc); we would encourage a rewording to classify food safety hazards into microbiological (i.e., the presence of undesirable levels of harmful bacteria, parasites, viruses and other biological agents), chemical (i.e., an excessive presence of undesirable chemical compounds from soil, air, water, agricultural practices, and other extraneous sources) and physical (the presence of a excessive amount of undesirable extraneous physical materials, e.g., glass, insects, metal, stone, wood). In an effort to help we are proposing some text that FAO is using elsewhere:
 - **Food quality** includes all attributes that influence a product’s value to the consumer. This includes negative attributes such as spoilage, discolouration, off-odours and positive attributes such as the origin, colour, flavour, texture and processing method of the food. (FAO Food Control book No76). Social expectations and consumer demand are leading to the development of agricultural and food products of specific quality such as those produced by

- organic farming, fair trade, or having a geographical indication. (FAO Fact Sheet Specific Quality and Voluntary Standards).
- **Food safety** is the absence, or safe, acceptable levels, of hazards in food that may harm the health of consumers. Food borne hazards can be microbiological, chemical or physical in nature and are often invisible to the plain eye; bacteria, viruses or pesticide residues are some examples. Food safety has a critical role in assuring that food stays safe at every stage of the food chain from production to harvest, processing, storage, distribution, all the way to preparation and consumption. (<http://www.fao.org/food-safety/en/>)
 - Para 53: As it pertains to food safety, we do not agree with the first part of the sentence premise that “Insufficient efforts in promoting regulations and control for food quality and safety negatively influence consumption patterns...” ; while it is true that they “...have negative consequences on the health and nutrition of consumers.”, it remains unclear how they could negatively influence the consumption patterns. Most food safety hazards and risks are not detectable by consumers during consumption of the food. However, the public health impacts can be strong and in almost all cases monitoring and surveillance systems are required to be able to detect and control outbreak of food-borne illnesses and to connect a source of contamination with such food-borne illness. In such cases, it may be difficult to establish a causal link between food safety regulations and changes in consumption patterns.
 - It may be helpful to clarify that insufficient awareness of the importance of food safety among consumers may negatively influence their consumption patterns by not creating the demand and drive for safe foods (thus putting pressure on public authorities to control, and encouraging producers to produce safe and quality food products). We have regularly witnessed that in food insecure countries people don't see a problem in eating food that has been recalled and incompletely destroyed, for example; or they would not pay attention to differences in hygiene among producers, therefore there is no reward from customers for a food producer to behave correctly (even more so because authorities are not exercising controls properly). This last observation could also be reflected as a comment for paragraph 55 (part 3/consumer behaviour) in case it were preferred to distill these messages in different places.
 - Furthermore, it is not clear what the statement “Improving food storage is another effective way to increase the amount, safety and quality of the available food. Strengthened institutions and policies are also key to improving cold chain and stabilization of the energy supply” has to do with traceability. It may be helpful in this context to include relevant aspects of the FAO/WHO/Codex approaches with regard to strengthening national food control systems.
 - Para 55: For respecting the **holistic approach**, food safety shall be integrated in Food and Nutrition Education and Information (pag.17). It may be added in the bullet point c) **Nutrition and food safety** education.
 - Para 56– **Evolving food habits**. We would suggest to highlight that food safety is becoming an urban issue that required to be addressed together with addressing dietary transition.
 - In addition, we are volunteering here some relevant paragraphs that we have used elsewhere in a similar context, hope they will be helpful:
 - Culturally and psychologically, food embodies the notion of safety, nourishment and comfort. Food sustains life and it essential to all human development, after air and water, food is third most essential human need. We allow food into our bodies, food

needs to be safe. However, in many countries, the available food is simply not safe enough.

- Despite the definition of food security, which includes a reference to safe food, a common perception is that food safety is a luxury that food insecure countries cannot afford. Food safety is often and wrongly considered as a mere quality aspect of food. But unsafe food is not just a minor inconvenience. It can lead to severe and debilitating diseases and even death. It contributes to malnutrition (poor absorption of micronutrients, stunting) making it impossible to achieve food and nutrition security without safe food. It increases the public health burden, impacts livelihoods (inability to work, reduced incomes) and as markets develop can lead to exclusion from the market place thereby impeding economic development.
- However, food safety means the compliance with standards that are designed to protect human and animal health. Intuitively, ensuring the safety of the food supply means that some food products will need to be discarded when they don't meet the requirements set up by safety standards. If it's not safe, it is not food.
- The need for food to be safe, provides in inherent tension and competition to efforts that are solely aiming at increasing food security in particular with regard to its dimension of access, availability and stability.
- Yet, without food safety, there cannot be food security, food simply has to be safe to count as food. It is useful to "unpack" the positive effects of a safe food supply on food security, starting with utilization, which is maybe the most obvious, and most direct, but also on the other dimensions in particular through its economics positive effects. Recent facts and figures provided by the WHO FERG study and WB study are providing useful pointers in that regard[1].
- It is important that policy makers, beyond the traditional audience of food safety professionals, realize that focusing food control systems on prevention, and having a whole food chain approach are key to unlock this apparent contradiction between food safety and food security. To overcome trade-offs between food safety and food security in an appropriate manner to the national or regional context, a process for developing a policy dialogue based on evidence is critical.
- In practice countries realize these connections, but depending on their national situations, they may face different challenges:
 - Some countries present immediate and large scale food and nutrition security challenges, and due to lack of data about the impact of food safety on the national human health and economic situation, allocating resources to improving food safety may not appear as an immediate priority. However because of the impact on nutritional status, efforts to progress in relation to food and nutrition security indicators (without addressing food safety) are negatively impacted.
 - Some other countries, while still presenting challenges related to food and nutrition security, are already benefitting from export opportunities. To secure these, important investments have been made to allow food safety requirements to be met on the export markets. However transferring these knowledge and investments

^[1] An estimated 600 million – almost 1 in 10 people in the world – fall ill after eating contaminated food and 420 000 die every year.

Children under 5 years of age carry 40 percent of the foodborne disease burden, with 125 000 deaths every year.

The value of trade in food is US\$ 1.6 trillion, which is approximately 10 percent of total annual trade globally. Recent estimates indicate that the impact of unsafe food costs low- and middle-income economies around US\$ 95 billion in lost productivity each year.

to the domestic markets is not happening automatically, and dual food safety approaches are still common.

- Some other countries have developed and are maintaining robust food control systems for exports and domestic markets, at least for formal food businesses. However, food and nutrition security concerns still persists, for specific regions, or socio-economic segments of the population, and micro-businesses are difficult to integrate in these models. As their role is key for national development, developing tailored and specific policy approaches is critical.

Proposed changes in the text – Voluntary Guidelines on Food Systems and Nutrition

III. The Voluntary Guidelines on Food Systems and Nutrition

PART 1 – Food Supply Chains

1. Production Systems

Policy-relevant areas

b) Agricultural policies and strategies

National policies, public investments, strategies and programmes that raise the profile of nutrition and include nutritional outcomes can orient agricultural production systems towards diverse and nutritious foods that enable healthy diets. In addition, national policies and strategies aiming at improving nutritional outcomes should incorporate nutrition education in the extension services, which focuses primarily on production practices – this can contribute to shift the production patterns towards the production of crops with high nutrient density and crop diversification.

f) Linking farm to school and institutional procurement

Linking farm 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 fosters the integration of local farmers into school food supply chains. Food safety must be secured by applying hygienic practices in the processing and packaging of foods. Such initiatives can positively contribute to school-aged children's nutrition knowledge, including the socio-cultural aspects related to eating habits, and consumption behaviour. In addition, linking farm to institutional procurement (or structured demand) can incentivise farmers to invest in agriculture production, which can contribute to improve the quantity (yields) and quality of production in terms of nutrient content and economic/market value of the crops (i.e. more nutritious food and income to farmers in their capacity as consumers and producers).

Commented [DP(1): e.g., national food reserves, procurement of food for the army, public hospitals, etc.

4. Retail and Markets

Policy-related areas

b) Supply of nutritious foods

New policies should be developed to encourage retailers to supply more nutritious food items at affordable prices, and to procure local products, particularly from smallholders at rewarding prices, bringing a positive impact in terms of dietary patterns and nutritional outcomes. At the same time, local farmers should be supported to meet safety and/or quality standards that could enable them to reach broader markets and higher profits for their products. Policies should also consider ways to restrict the marketing of products high in fat, sugar and salt.

Commented [DP(2): The production of nutritious foods can be associated to high production costs. Local farmers will need a concrete package of incentives in order to change theirs production patterns towards the production of such crops, e.g., access to credit, subsidies, link to institutional procurement, etc.

PART 2 – Food Environments

1. Availability and Physical Access (Proximity)

Policy-relevant areas

b) Public food procurement

Healthier diets can be enabled through incorporating nutrition standards into the procurement of food in public settings such as schools, hospitals, workplaces and government institutions. Food procurement policies should ensure the provision of, preferably local, high quality and safe food options. These policies should also influence nutritious food production by providing a reliable source of demand for local producers and businesses [through linkages with structured demand \(institutional procurement\) such as school feeding programmes, national food reserves, etc.](#)

2. Economic Access (Affordability)

Policy-relevant areas

PART 3 – Consumer Behaviour

1. Food and Nutrition Education and Information

c) Nutrition education

Education on food and nutrition at school, in communities and at universities, strengthens consumers', farmers' and food processors' understanding of the nutritional value of various food sources and preparations, and empowers consumers to make informed choices and prioritize good nutrition and healthy habits. Nutrition education, as part of other services such as mother-child health care and school meal programmes, can provide information and guidance on healthy (and sustainable) feeding practices, including breastfeeding. Nutrition education for adolescents, especially girls, is a key entry point as it could contribute to improve the nutritional status of the adolescent, their nutritional behavior and status in later life and of their children, positively impacting the intergenerational cycle of malnutrition. [In addition, integrating nutrition education in the extension services will contribute to improve the nutrition knowledge and status of farmers, more specifically rural and illiterate farmers. This can contribute to strengthen the understanding of the nutrition value of various food sources and preparation and empower farmers \(as producers and consumers\) to make informed choices and prioritize the production of crops with high nutrient density and crop diversification.](#)

Commented [DP(3): I would suggest to include one additional policy:

Credit and crop insurance policies: depending on the type of production systems, farmers are vulnerable to various degrees of market prices and climate related shocks, which affects crop yields and the quality of production. Measures like crop insurance, credit and subsidies can increase the resilience of smallholder farmers to climate related shocks, and at the same time incentivise them to invest in agriculture production.

