

Mandate of the Special Rapporteur on the right to food

28 June 2019

Dear CFS Chair, Secretariat, stakeholders,

It is with pleasure that I am sharing this statement and comments below to contribute to the CFS efforts towards this important milestone. These comments build on and expand those made during the OEWG on 30 May 2019.

As the Special Rapporteur on the right to food, it is within my mandate to “promote the full realization of the right to food and the adoption of measures at the national, regional and international levels for the realization of the right of everyone to the **adequate food** and the fundamental right of **everyone to be free from hunger** so as to be able fully to develop and maintain their physical and mental capacities.” (A/HRC/RES/6/2).

Accordingly, I aim to ensure that all States, intergovernmental and non-governmental organizations with whom I work in my capacity as Special Rapporteur, shares the mutual understanding that States must respect, protect and fulfil the right to food, and all human rights, set forth under international human rights law.

As the Human Rights Council Resolution 6/2 reaffirmed that the **Right to Food Guidelines adopted by the FAO in 2004** represented a practical, if not ground-breaking, tool to promote the realization of the right to food for all, **the proposed “Voluntary Guidelines on Food Systems and Nutrition” offers a valuable opportunity to advance this right even further.** The potential of these guidelines to do so, however, depends on whether the right to food, and human rights generally, are placed at the centre of the policy process.

My mandate allows me to stress the vital importance of including nutrition as part of the right to adequate food. Nutrition has become a universal concern. Nutrition is an issue larger in scope and more complex than hunger. Solutions to mitigate and overcome malnutrition in all of its forms are harder to produce because they can be affected by almost every kind of national and international policies (such as all SDGs), extending even beyond the several pillars of food security. We should not miss this opportunity to address this crucial matter from a universal perspective.

The importance of the right to food in the context of the Voluntary Guidelines on Food Systems and Nutrition is indisputable. **Article 11 of the International Covenant for Economic, Social and Cultural Rights** explains that “*disseminating*

knowledge of the principles of nutrition and ... developing or reforming agrarian systems” is necessary “[t]o improve methods of production, conservation and distribution of food.” This language reflects an intergovernmental consensus that has evolved over the course of more than half a century.

Recalling a concern raised at the last OEWG discussions, I would like to provide the CFS with additional contextual material to show why mentioning the right to health is an integral element of the right to food, or other relevant human rights is not only appropriate within the CFS forum. This will help explain and understand why mentioning health is necessary to ensure the comprehensive realization of the right to food. As I indicated in my report (A/71/282) to UNGA 3rd Committee in October 2016:

“Ensuring the right to adequate food extends far beyond merely ensuring the minimum requirements needed for survival and includes access to food that is nutritionally adequate. Increasingly, the right to adequate nutrition is being recognized as an essential element of the right to food and the right to health... In fact, nutrition is considered as the vital link between the right to health and the right to food and ensures that the human rights framework promotes both rights.” (See; para 57 and 58).

The entire United Nations system embraces an understanding that human rights are universal and inalienable; that human rights are indivisible; and that human rights should always be appreciated as interdependent and interrelated. Several international human rights instruments reflect the principle that each right often depends, wholly or in part, upon the fulfilment of another, that human rights are to be interpreted and applied holistically. Article 55 and 56 of the UN Charter (1945) sets forth in general terms the **importance of maintaining an adequate standard of living and improving the quality of life**, and confers a **responsibility to ensure these goals to international organizations**.

Article 25 of the Universal Declaration of Human Rights (UDHR, 1948) further articulates the **“right to a standard of living adequate for the health and well-being.”** The ICESCR in Art. 11 encapsulates the right to food, and housing, as well as right to health in Art. 12, and, right to social security in Article 9. All these specific rights were interpreted by way of the General Comments (for instance General Comment 12 on Right to Food, 1999) submitted to the Committee of the Economic, Social and Cultural Rights.

Moreover, international human rights treaties that focus on specific groups, such as the Convention on the Rights of the Child (1989); the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, 1979); Convention on the Rights of Persons with Disabilities (2006), explicitly recognize the right to adequate food, as well as economic, social and cultural rights, and civil and political rights. This notion of the right to food has been overwhelmingly adopted by member states.

What is Human Rights Based Approach?

In 2003, the UN signed the **‘UN Common Understanding on a Human Rights-Based Approach.’** This memorandum of understanding acknowledged the critical need for HRBA to practically ensure that human rights principles are integrated in

policy-development and governance and it proposes basic, but universally-agreed upon principles of an otherwise flexible framework.

Recognizing that all human rights are interdependent, interrelated, and indivisible in principle, is not the same as practically adopting measures that adhere to and are based on this concept. This is where a human rights-based approach (HRBA) becomes critical: The Right to Food Guidelines, a guiding document of the reform document of the CFS explains in its Preface:

“These Voluntary Guidelines are a human rights-based practical tool addressed to all States. They do not establish legally binding obligations for States or international organizations, nor is any provision in them to be interpreted as amending, modifying or otherwise impairing rights and obligations under national and international law. States are encouraged to apply these Voluntary Guidelines in developing their strategies, policies, programmes and activities, and should do so without discrimination of any kind, such as to race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.”

It also states: *“These Voluntary Guidelines have taken into account relevant international instruments, in particular those instruments in which the progressive realization of the right of everyone to an adequate standard of living, including adequate food, is enshrined.”*

Further continues: *“The progressive realization of the right to adequate food requires States to fulfil their relevant human rights obligations under international law ...At the national level, a human rights-based approach to food security emphasizes universal, interdependent, indivisible and interrelated human rights, the obligations of States and the roles of relevant stakeholders emphasizes the achievement of food security as an outcome of the realization of existing rights and includes certain key principles: the need to enable individuals to **realize the right to take part in the conduct of public affairs, the right to freedom of expression and the right to seek, receive and impart information, including in relation to decision making about policies on realizing the right to adequate food.**”*

Moreover, a HRBA “should take into account **the need for emphasis on poor and vulnerable people who are often excluded from the processes** that determine policies to promote food security and the need for inclusive societies free from discrimination by the State in meeting their obligations to promote and respect human rights.”

A HRBA reinforces the legal principle that States are duty-bearers of human rights, and that all persons, rich or poor, old or young, male or female, and everything in between, are rights-holders, **not just passive recipients of charity**. As such, a HRBA requires States to ensure that **adequate institutions and avenues to justice exist**, so that all rights-holders have a means through which they may **hold States accountable for rights violations and secure remedial relief for themselves**. The HRBA amounts to an agreement by States to acknowledge human rights obligations, to focus on the most marginalized, excluded, or discriminated against

segments of the population, and to account for power imbalances that undermine governance. In the context of the CFS, the RTF Guidelines puts it simply: **“A human rights-based approach requires not only addressing the final outcome of abolishing hunger, but also proposing ways and tools by which that goal is achieved. Application of human rights principles is integral to the process.”** The HRBA, for the sake of simplicity could be summarized as, **participation in decision making, transparency, non-discrimination, and accountability.**

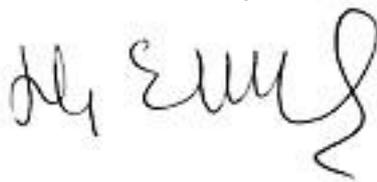
UN Agencies and bodies within the UN wide system such as CFS, and the RBAs, including the FAO, cannot address the right to food in isolation, or in a vacuum. Doing so is not only contrary to the prevailing consensus in UN system, but diminishes the impact of CFS. Consider the CFS’ monumental work on crises, responsible investment, tenure of land, fisheries and forests, and smallholder farmers: these efforts rely on States recognizing human rights to food, health, adequate housing, water, decent work, education, equality and non-discrimination, to name a few.

However, I should clarify that **the CFS is *not* required to mention explicitly all norms of human rights in the Voluntary Guidelines on Food Systems and Nutrition.** I understand that the guidelines cannot technically address every human right. Nevertheless, CFS should remain mindful of their intrinsic relations of all human rights, and the potential harm to the right to food that could result if policy action towards other human right is not taken into full account. It is well-within the CFS mandate to adhere to the very human rights principles that it previously endorsed in the Right to Food Guidelines. Promoting the right to food should also lend support for, if not recognition, of human rights as a whole.

As a UN policy product, the Voluntary Guidelines should reflect the HRBA for the reasons indicated above. I hope that this explanation and my comments below are helpful to the OEWG Chair and CFS Secretariat, to whom I am extremely grateful for the work being done in support of this policy convergence process. The collaboration between my mandate and the CFS has established an excellent precedent for future multi-stakeholder cooperation, and I look forward to the further benefits of its full and lasting impact.

Thanking the CFS Chair, Secretariat and Technical Task Team for the work undertaken so far, I hope that this document strongly advocates for the inclusion of the right to adequate food in this and subsequent Drafts to come of the Voluntary Guidelines on Food Systems and Nutrition. Please let me know if there is a need for further discussion and/or clarification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hilal Elver', written in a cursive style.

Hilal Elver
Special Rapporteur on the right to food

Comments on CFS Voluntary Guidelines on Food Systems and Nutrition—Zero
Draft

General Comments

1. International human rights law clearly establishes that **the human right to adequate food includes the right to nutrition**. (See Article 1.2 of the International Covenant on Economic, Social and Cultural Right). As such, every State is required to adopt a national strategy to ensure food *and* nutrition security for all, based on human rights principles, and which is *adequate* from an economic, social, cultural perspective. The General Comment No. 12 by the Committee of Economic, Social and Cultural Rights adopted in 1999, the Declaration of the ICN2 and my early report on the Right to Food and Nutrition offer language and evidence to this end and should be reflected in the first part of the document.
2. The definition of the right to adequate food provided in Section II, while correct, should include the more comprehensive explanation of its component parts and fundamental elements as it was done in other guidelines: The human right to adequate food must be realized as it is only realized ‘when every man, woman and child, alone or in community with others, has physical and economic access at all times to adequate food or means for its procurement. The right to adequate nutrition is an element of the right to food, along with “availability, accessibility, adequacy and sustainability” as the International Covenant on Economic, Social and Cultural Rights acknowledges that the right guarantees not just “the fundamental right to freedom from hunger” but also from *malnutrition*. (Article 11.2, ICESCR). See Specific Comments, below for suggested definition.
3. International obligations, standards and norms require States to respect, protect and fulfil the human right to adequate food to overcome hunger and malnutrition and realize food security for all. As we get closer and closer to a broader understanding and perspective on what being food systems are and how they affect nutrition, which is hampered by people not having access to adequate food, it would be important to include not only access to nutritious and sufficient, or healthy food, but *adequate* food from a number of standpoints and dimensions, including: sustainability, as well as cultural, social, economic, climatic, ecological factors, etc. What it is meant by ‘adequate’ in the international normative is again available in the General Comment 12 by the Committee of Economic, Social and Cultural Rights (CESCR) adopted in 1999, see paragraphs 6, 7 and 21.
4. The Voluntary Guidelines offer an important opportunity to remind States that the policy recommendations and guidance contained therein are **rooted in human rights law**, which obligates States to take steps necessary to progressively realize the right to food. As suggested in the Specific Comments, below, the statement of the Guidelines’ objective featured in para. 18 should explicitly recognize the relevance of *human rights* laws and obligations.
5. **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, Objectives and Nature and Scope, as well as in Key Concepts and Guiding Principles. Please see how other Guidelines have addressed this complementarity. More comments will refer to this later on, and specific Guidelines from other policy documents will be made available and referred to as an example.

6. Taking steps to improve food systems and nutrition requires States to fulfil obligations relevant to other economic, social and cultural rights, as **all human rights are universal and inalienable; indivisible, interdependent, and interrelated**. The Guidelines should therefore speak to all duty-bearers and rights-holders, and just like the RTFG and VGGTs, the RAI Principles, the CFS-FFA, and even the COFI's SSFGs, 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.)” I welcome this comment to be reflected across the document.
7. Related to this last point, by looking at all previous Voluntary Guidelines and Principles produced in the past 15 years, an expanded section on **implementation, monitoring and accountability**, 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 (starting with the UN Charter, then the UDHR, ICESCR, ICPCR, CEDAW, CRC, RTFG, VGGT, RAI, FFA, SSFG, etc.). 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. I encourage therefore a clear and explicit mention to what extent they do so and why, in the Preamble, Objectives and Nature and Scope, as well as in Key Concepts and Guiding Principles.
8. Hence, the Voluntary Guidelines should reflect existing human rights standards and provide useful **guidance to States on how to monitor and implement existing obligations**. 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:
 - a. Right to Food Guidelines’ 5, 6, 15, 16, 17, 18, 19 and Part III

- b. VGGTs Part 2 and 7
 - c. SSFGs' Part 3, Guideline 13
 - d. The RAI Principles' Principle 10 on accountability and entire section on Roles and Responsibilities of Stakeholders
9. The word “poverty” appears only once in the text, despite the fact that **poverty reduction or alleviation efforts often go hand-in-hand with nutritional programs** and the realization of the right to food. *See, e.g.* CESCR General Comment No. 12, para 5: “The Committee observes 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 available food, inter alia because of poverty, by large segments of the world’s population.”
10. There needs to be a **greater discussion of power-imbalances intrinsic in the food system; greater inclusion in decision-making processes; avoiding and assessing conflict of interest; consideration of minority, women, children, indigenous, and vulnerable populations; and greater accountability by States.** The HLPE report no. 12 identifies the right to food as a critical underpinning for improving dietary nutrition and for addressing the aforementioned issues (see 6.2.1 “Failure to recognize the right to adequate food” and para 36): “[a]ction requires recognizing the right to food and prioritizing this rights-based perspective for the **most vulnerable**. Although recent pledges by governments, and the SDGs themselves, emphasize rights-based approaches, many countries still fail to recognize this right. Power struggles present challenges as transnational food corporations use their economic power to hinder political action to improve food systems and diets.”
11. The Voluntary Guidelines on Food Systems and Nutrition should emphasize the importance of **focusing on the most vulnerable groups and individuals in societies.** 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 fishermen, 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 offer insight on how this particular challenge has been addressed. This should be an element present throughout the document.

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, and should be at least acknowledged in the text – even though measuring these factors is extremely difficult. People's food insecurity 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 hunger) and how that determines their access to adequate food. We must begin to question even how we look at the world and what we present as a snapshot of the global state of food insecurity and malnutrition.

12. Section I.3 '**Nature of the Voluntary Guidelines** and their Intended Uses' (paras. 25-26) contains important content that should be more prominently featured at the outset of the Guidelines. Please consider starting the guidelines with this content or integrating the information into one of the two previous sections. Examples of how Preambles and Prefaces have been drafted, can be found in all the other Voluntary Guidelines and Principles endorsed or adopted over the past decade and a half.
13. The **five main categories and related drivers** identified by the HLPE as impacting the functioning of food systems and their ability to deliver healthy diets (para. 24) and the Section II. '**Key Concepts and Guiding Principles**' are also important for framing the discussion and structuring the Guidelines. The current organization of the Guidelines does not utilize the elements of the key concepts and guiding principles. *See e.g.* the explanation of 'Food Environments' as a 'Key Concept' in Section II.1, which is defined as referring to "physical, economic, political and socio-cultural context[s]" *compared with* the later discussion on 'Food Environments' in Section III. Part 2. which features sub-sections on physical access, economic access, but not on political or socio-cultural contexts (instead, there is a sub-section entitled "promoting and advertising"). Similarly, the elements of the "right to adequate food," (another Key Concept and Guiding Principle) which include "availability, adequacy, accessibility, and sustainability," should dictate the structure of the Guidelines.
14. **Clear principles of implementation** should be stated, as essential to contribute to sustainable food systems: participation, accountability, nondiscrimination, transparency, human dignity, empowerment and equality, and the rule of law. These are also **cross-cutting factors** discussed in para. 41 and should be included as to ensure the realization of the right to food.
15. Section III. Part 1. '**Food Supply Chains**' should include a discussion of **agriculture and food workers and their rights** within the chains. Specific policy recommendations must be provided to ensure adequate protections for the formal and informal workers engaged in primary and secondary stages of agricultural and fishery supply chains. The Guidelines should take into account the prevalence of women and children in food supply chains, the lack of social protection due to high informality, the lack of sanitation infrastructure and education on health; and the need to improve access to

nutritious foods, etc. I discussed this extensively in my reports A/73/164 and A/HRC/40/56.

16. **Policy-relevant areas for ‘Production Systems’** listed after para. 42 should include **pesticides and biochemical use** that has a detrimental impact on public health and biological diversity, as well as **small-holder farmers** who are responsible for producing an estimated 70 per cent of the world’s food, yet face tremendous challenges and precarious situations.
17. While the **Policy-relevant area of “Food losses and waste”** under “Storage and Distribution” (para. 44, point (a)) is an emerging topic, it presents practical complications, especially in developed countries where liability laws are seen as prohibiting or deterring food saving measures. There is a need to expand upon this concept. This is also one area in particular where the category of demographics from the HLPE report, and country specific information will significantly alter the applicability of the guideline. FAO has recently developed a [study](#), which illustrates how food lost and waste is hampering the right to food.
18. **Policy-relevant areas for ‘Food Quality and Safety’** listed after para. 53 should include **harmful and excessive use of pesticides** that has a detrimental impact on public health and undermines nutrition. The discussion on “Food quality improvements” (point (b)) should also clarify that **food fortification** should be used only exceptional situations (*see* specific suggestions, below). Food fortification should be limited to emergency and short-term situations. Nutritious food should not be medicalized.
19. The **six Global Nutrition Targets** (2025) referenced in para. 60 are not a strong tool to guide policy implementation. The targets are weak on childhood obesity and do not mention adult obesity. The Guidelines should encourage more ambitious targets for individual countries.
20. The discussion on **multi-stakeholder platforms, partnerships** in para. 61 should not include a reference to the Scaling Up Nutrition (SUN) Movement. Providing such a specific example that highlights only one organization or platform is not appropriate in voluntary guidelines. The paragraph should also acknowledge the need for these platforms and partnerships to be more inclusive, especially of vulnerable and marginalized communities, and address other shortcomings that the HLPE on Food Security and Nutrition have raised in the context of the *2030 Agenda* (*See*, HLPE. 2018. Multi-stakeholder partnerships to finance and improve food security and nutrition in the framework of the 2030 Agenda. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.) Related to multi-stakeholder platforms, I encourage making reference to the role played by **parliamentarians** to promote normative, legislative action ensuring sustainable food systems and nutrition.
21. The Guidelines should **emphasize the importance of public participation** in policy development, decision making, monitoring and implementation, and should discuss **social movements and coalition building** among civil society and private sector to support the efforts of States.

Specific Comments

- Part I is rather similar to what other instruments call a Foreword or Preface. Consider changing this Introductory part into that.
- Part I does not include a section related to the basic instruments or preliminary sections where it is highlighted to what specific international normative these Guidelines make reference to.
- Para. 1, line 4: after “global food security” and before “sustainable development” insert “the right to adequate food”
- Para. 3, after sentence 1: insert the following sentence (or something similar): “Yet micronutrient deficiencies are not easily detected, and are therefore referred to as ‘hidden hunger.’”
- Para. 7, sentence 2: insert “Conflict,” before the word “[f]ragility”
- Para. 15, last sentence: please include “and the UN Special Rapporteur on the right to food” after “World Health Assembly (WHA)” and cite to the report that I presented to the UN General Assembly’s Third Committee on nutrition and the right to food in October 2016 (A/71/282).
- Para. 11, line 3: after “adolescent girls” insert “and boys” or delete “girls,” (it should refer to all “adolescents”)
- Para. 11, in line 4: after “indigenous people” insert “peasants, agriculture and food chain workers”
- Para. 17, line 2: insert “including international organizations” after “other stakeholders”
- Para. 18, line 2: insert the word “sustainable” after “acceptable” in line 2.
- Para. 18, line 5: after obligations, insert “including human rights obligations, such as the progressive realization of the right to food.”
- Para. 19, line 3: insert “right to food” after the word “addressing”
- Para. 24, subsection (d): insert “rights and” after “women’s”; insert “human rights” in the parentheses
- Para. 25, in line 2 after “international law”: insert “Voluntary Guidelines on right to food and other CFS guidelines” (each should be named). Also include in The UN Declaration on the Rights of Indigenous Peoples (UNDRIP), and the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas.
- Para. 33: insert “and nutrition” after “the right to adequate food” and replace the existing definition with the following: “is the right to have regular, permanent and free access, either directly or by means of financial purchases, to quantitatively and qualitatively adequate and sufficient food corresponding to the cultural traditions of the people to which the consumer belongs, and which ensures a physical and mental, individual and collective, fulfilling and dignified life free of fear. The right to food is the fundamental right to freedom from hunger *and malnutrition*.” (see general comment 2, above)
- Para 36. f) this needs to be expanded by including the relevant instruments already existing which promote its realization, including CFS products.

- Para. 40, should not just limit to add the list of Guidelines as a footnote. It should clearly state that, rather than expected, the recommendations or better, the ‘*guidelines*’ will *build upon, make reference to, and complement related guidance previous provided in other CFS and FAO policy guidelines and principles as well as the work and mandate of other relevant international bodies*. (No need to mention avoid duplication as this is a given in the idea of complementarity). In the VGGTs’ preface, the RAI Principles’ conceptual framework, and the SSFGs’ preface this complementarity of instruments is made explicit.
- Para. 41, line 3: please include “right to food” among the “pathways” listed. Also, among the cross-cutting factors all the following principles should be included: participation, accountability, non-discrimination, transparency, human dignity, equality and empowerment, and the rule of law. While some of these are already included (accountability, transparency, and empowerment and equality) but the other ones are equally important. Other cross-cutting factors and approaches which the Guidelines should embed are: multi-stakeholder and multi-sectoral approach.
- Para. 44, subsection (a): Para. 34, subsection (a) in last line: delete “increasing shelf life”
- Para. 48, in line 3: after “forced displacement”, include “poverty and lack of purchasing power”
- Para. 48, include another subsection: “(d) Support spaces, and designate common areas for local gardens and vegetable production, create urban gardens.”
- Para. 51, line 6: insert “and adolescents (or young adults)” after “beverages to children.”
- Para. 51, subsection (b): delete “through voluntary and mandatory approaches”
- Para. 53, rephrase from the negative to the positive: replace “Insufficient efforts in promoting regulations and” with “Effective regulations and vigorous”; replace “negatively” with “positively”; replace “negative” with “positive”
- Para. 53, subsection (b): insert “Limited and controlled use of” before “[f]ood fortification” and insert “such as emergency situations and for limited time periods to prevent nutritional deficiencies while contributing to an improved health outcome” after “specific contexts”
- Para. 54, sentence 1: insert “purchasing power” before “demographics” and delete “and purchasing capacity”
- Para. 55, subsection (a) last line: after “community engagement” insert “to support fruit and vegetable based local production and consumption”
- Para. 55, subsection (b), first line: after “National food-based dietary guidelines” insert “that are socio-economically and culturally adequate”. And fourth line, after “adapted to national contexts and” insert “adequate food”.
- Para. 56, subsection (a): insert “due in part to urbanization” after “Global dietary patterns” and delete the sentence that states “Urbanization is a major

driver of dietary transition and lifestyle changes.” (As recognized, urbanization is a *driver*, not a recommendation.)

- Para. 56, subsection (b): after “several populations”, insert “prevents flourishing of discrimination-based food cultures”.
- Para. 59: change into “CFS should *continue to* provide a forum where all relevant stakeholders can learn from the experiences of others in applying *these Voluntary Guidelines and from the experience created by the implementation of previously adopted and endorsed instruments and tools and Voluntary Guidelines (RTFG, VGGTs, RAI, CFS-FFA, SSFGs, etc.)* The intention is to support countries *also in view of ongoing efforts in making SMART commitments and achieving nutrition objectives in the context of...*[same until end of paragraph].