

**Canada's input to the Preliminary version of the Zero Draft of the Voluntary Guidelines on Food Systems and Nutrition**  
**Committee on World Food Security (CFS), Open-ended Working Group on Nutrition**  
**22 March 2019**

**Paragraph 21: The most vulnerable to malnutrition:**

Missing from definition are the elderly, people who are ill or immune-compromised (from HLPE report on food systems and nutrition).

**Indigenous peoples and traditional food systems:**

Indigenous peoples are included in the “most vulnerable to malnutrition”. There is also mention of “loss of traditional knowledge,” in the policy-relevant area of “protection of wild foods and local foods”.

However, it is important to ensure that there is adequate consideration in the Voluntary Guidelines of the particular vulnerabilities and challenges faced by Indigenous peoples who rely on either traditional or mixed-food systems and that adequate policy guidance is provided in this area.

**Gender-based analysis:**

The most vulnerable to malnutrition are defined in the Zero Draft. However, one element that is still missing is including some sort of gender-based analysis to understand underlying drivers of inequalities in nutrition at all policy entry points. From my last round of comments: policymakers require strengthened capacities and tools on how to undertake systematic analysis of underlying drivers of gender-based inequalities in nutrition and in decision-making.

**Paragraph 34: Storage and distribution:**

One growing food safety concern in certain regions is aflatoxins. From a recent WHO publication, they are estimated to destroy an estimated 25% or more of the world’s food crops annually ([https://www.who.int/foodsafety/FSDigest\\_Aflatoxins\\_EN.pdf](https://www.who.int/foodsafety/FSDigest_Aflatoxins_EN.pdf)). Perhaps one of the policy-relevant areas could address post-harvest technologies and practices to mitigate the risk of toxins in staple crops.

**3. Promotion and Advertising; Policy-relevant areas; a) Regulations for advertising and marketing:**

“Children of all age groups require special protection and attention, e.g. through full implementation of the International Code of Marketing of Breast-milk Substitutes, bans on less nutritious foods and measures to **restrict food and beverage marketing** **ensure responsible food marketing**, subsidizing healthier alternatives and interventions in schools to promote healthier approaches to eating, as well as to encourage physical activity.”

**Page 7, 22. Healthy Diets**

- Some countries definitions of healthy diets / ways they describe healthy diets vary. *Recommend deleting the specific definition from WHO.*

~~22. Healthy diets “refer to a balanced, diverse and appropriate selection of foods eaten over a period of time. A healthy diet ensures that the needs for essential macronutrients (proteins, fats and carbohydrates including dietary fibres) and micronutrients (vitamins, minerals and trace elements) are met specific to the person’s gender, age, physical activity level and physiological state. WHO indicates that for diets to be healthy:~~

- a) ~~daily needs of energy, vitamins and minerals should be met, but energy intake should not exceed needs;~~
- b) ~~consumption of fruit and vegetables is over 400 g per day;~~
- c) ~~intake of saturated fats is less than 10% of total energy intake;~~
- d) ~~intake of trans fats is less than 1% of total energy intake;~~
- e) ~~intake of free sugars is less than 10% of total energy intake or, preferably, less than 5%;~~
- f) ~~intake of salt is less than 5 g per day".]~~

**Data:**

Canada also recommends a focus on evidence-based approaches and the use of data. At present the document makes no such reference.