

Comments on Draft One – Voluntary Guidelines on Food Systems and Nutrition

Costa Rica would like to commend the work carried out by the Secretariat and the Chair of the OEWG during this process, your guidance and inclusive approach on every step of the way, has made Draft One, a wide-ranging document that promotes the construction of the very much needed multi-sector approach to tackle malnutrition and unsustainable food systems.

Attending to the request of the Chair, following you'll find Costa Rica's comments to the Draft:

General Comments:

- a) Costa Rica welcomes the reiteration of the **nexus between obesity and ill health**, present along the Guidelines. As a developing country Costa Rica is still trying to find the more effective way to combat both sides of malnutrition: stunting and obesity, especially among the most vulnerable groups (children under 5 years of age, adolescent girls, women of childbearing age, and pregnant women). A sustainable way to reduce and control both, is key to achieve SDGs, in particular SDG2.
- b) Technology and innovation are indispensables for modern day agriculture, and central elements in the process of creating and administrating sustainable food systems, specially in the wake of the fourth industrial revolution. In this regard Costa Rica considers that the Guidelines should include a stronger presence of these concepts throughout the document (Innovation is only mentioned 3 times).
- c) Costa Rica appreciates the approach of the section dealing with humanitarian assistance section 3.6 and, as stated by other participants, we consider that the document also needs to make reference to development assistance, as only a balanced promotion of humanitarian aid and development assistance will foster the construction of resilient food systems.
- d) As a general note on language, we consider that Draft One of the Guidelines should add the phrase "... and other Governmental actors" after every mention to the "States" in order to make more visible the intersectionality of Governments actions towards the promotion of nutrition and the construcion of resilient and sustainable food systems.
- e) We have noticed that there is only one specific reference to family farmers as actors of the food systems in the draft document. Therefore, we would like to suggest the inclusion of a reference to family farmers on the section of key concepts highlighting their role on the construction of sustainable food systems, or a clarification, ,as requested by other colleagues, in the sense that the document states that the definition of smallholders includes a wide range of family farmers.

Specific Comments:

Part 2:

Sub Chapter 2.2. GUIDING PRINCIPLES FOR RESHAPING OR PROMOTING SUSTAINABLE FOOD SYSTEMS

Paragraph 32

Food systems serve and support multiple objectives within the three dimensions of sustainable development. While food systems might differ greatly, they offer important opportunities for public **policy ies, mechanisms and** , instruments and investment that aim to advance the goals of the 2030 Agenda for Sustainable Development.

Paragraph 34,

e) **Gender equality ~~ity~~ and women's empowerment.** Promote gender equality ~~ity~~ and women's and girls' empowerment, promoting and fulfilling their rights and considering the importance of creating the conditions for women's involvement in decision-making and strong engagement in shaping **sustainable** food systems that improve nutrition, given their key role in care, education, health promotion and food consumption.

Paragraph 39

Subchapter 3.2.2 Promoting nutrition within agriculture and food production

b) States *[and other Governmental actors]*, private sector food actors and development partners should support and incentivize smallholders, *[~~and particularly family farmers~~]* within developing countries, to adopt sustainable production practices and to produce diverse crops that will contribute to the availability, affordability and accessibility of nutritious food, while enhancing farmers' income and livelihood.

Sup-chapter 3.2.3

e) States should institute regulatory instruments to promote reformulation, complemented with warning labels and ~~taxes~~ **measures** on less nutritious food products that do not adhere to national foodbased dietary guidelines

Sub-chapter 3.2.4 making markets work for nutrition

c): the sustainable diets part is not adequately reflected

c) States and private sector actors should support smallholders, *[in particular family farmers]* to meet safety and quality standards of nutritious food that enable them to fulfill demand for the local consumption whilst reaching broader markets and getting higher profits for their products.

Sub-chapter 3.3.1

b) States should encourage zoning laws and ~~tax incentives~~ for farmers' markets and mobile food retailers that sell nutritious food in low-income areas, and reduce the density of fast-food vendors that sell less nutritious food.

Sub-chapter 3.3.3:

3.3.3 Making nutritious food more affordable

a) States should consider making nutritious food more affordable **[through fiscal policies and access to credit for promoting the consumption of perishable fruit and vegetables, whole grains, legumes, nuts and seeds, and animal source food]** ~~to ensure they are affordable and competitive compared with highly processed food (which can be inexpensive but high in added sugars, sodium and trans-fats or unhealthy fats). This can be done through input subsidies, access to credit, and tax.~~

B. States *[and other Governmental actors]* can be instrumental in reducing the prices of nutritious food by helping farmers reduce their production costs. This can be accomplished through ~~grants, subsidies~~ **[incentives and]** non-financial support services to reduce inefficiencies and promote value of nutritious food in the supply chain.

Commented [LCP1]: We reiterate our need to avoid the use of words such as taxes, subsidies, pricing, etc.giving the implications that it could have in other fora (i.e. WTO)

d) States should institute ~~tax~~ incentives and ~~other~~ fiscal policies to promote more nutritious food in the food industry. This can be done by creating disincentives ~~including excise or sales taxes on less nutritious~~ **[and sustainably produced]** food, such as sugar-sweetened beverages and less nutritious highly processed food, or removing industry ~~tax~~ benefits for the development and marketing of less nutritious food. ~~Tax revenues~~ **Fiscal policies** can also be used for health promotion strategies or **[agricultural research]**, agricultural incentives to reduce the price of nutritious food.

Chapter 3.4

Paragraph 41:

In **Sub-chapter 3.4.1** "Putting people at the centre of nutrition knowledge, education and information" the sustainable diets part is not adequately reflected:

b) States should use the best scientific evidence to promote education and knowledge of **[sustainable food systems]**, healthy diets, physical activity, food waste, **food safety**, adequate breastfeeding and complementary feeding, taking into consideration cultural and social norms and adapting to different audiences and contexts.

In **Sub-chapter 3.4.3**

b) States should support school and worksites to serve nutritious **and sustainably produced** food to school-aged children and workers and promote culinary skills among school age children, adolescents and in adults, to promote communal meal times, socializing around food, the consumption of more healthier diets and the need to reduce food waste.

c) States should link the provision of healthy **and sustainably produced** school meals with clear nutritional objectives and be adapted to the needs of different age-groups, with special attention to the needs of adolescent girls. Policymakers should review education curricula to incorporate nutrition education principles, while adopting practical teaching tools such as school gardens and culinary lessons, and providing technical support to help schools implement changes.

Chapter 3.5 GENDER **EQUALITY** ~~ITY~~ AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS

42. Gender relationships and norms are among the most significant drivers of healthy diets. In many countries, women make decisions about the household's diet and, as primary caregivers, they have an influence on the family's nutritional status. Therefore, women's and girl's empowerment through education, information and access to resources and services is key to improving nutrition. Improving women's wellbeing, ensuring access to financial, technical and biophysical resources, improving agency, voice and status, and challenging the power relationships that limit choices, are promising policy entry points to empower women and ultimately, improve food security and nutrition.

3.6 FOOD SYSTEMS AND NUTRITION IN HUMANITARIAN CONTEXTS

43. This part build upon the 11 principles in the FFA. In situations of humanitarian crises, there is a critical need for nutrition interventions that link humanitarian responses assistance for longer-term strategies to strengthen the resilience of food systems and improve food security and nutrition. For populations with optimal nutritional status at the onset of a humanitarian crisis, their status needs to be protected **[with the promotion of resilience and strengthening programs to ensure that their situation improves]**. For those who are already dealing with a malnutrition, emergencies can be a tipping point which can exacerbate malnutrition issues.

Commented [pp2]: Gender Equality is preferred because equality is a well defined HR principles and has a legal bases to it , also Gender Equality refers to a larger goal than Gender Equity , for this you can refer to **CEDAW** convention

Part 4:

In **Paragraph 48**, the sustainability aspect is missing

*48. Donors, financing institutions and other funding entities are encouraged to apply the VGFSyN when formulating their policies for loans, grants and programmes to support both right holders and duty bearers' endeavors. The VGFSyN should contribute to the design of nutrition-sensitive investment that aims to increase the production, affordability, and access to diverse and nutritious food, **[as well as]** to promote the integration of nutrition and health dimensions into **[sustainable agriculture]** and food systems.*

In **Paragraph 50**, the sustainability aspect is missing

*50. The intention is to support countries in making "SMART" commitments²⁷ and achieving nutrition **[and sustainable agriculture and food systems]** objectives as well as the creation of informal coalitions of countries as a way to accelerate and align efforts around specific topics linked to one or more action areas of the Nutrition Decade. This can be done through advocating for the establishment of policies and legislation, allowing the exchange of practices and experiences, highlighting successes and lessons learnt, and providing mutual support to accelerate its implementation.*

Paragraph 51 (second sentence): mention multi-stakeholder platforms in the sustainable food system area, not only SUN movement as a multi-stakeholder initiative from the nutrition sector.

*51. Multistakeholder platforms, partnerships and frameworks and local, national and regional levels and across multiple sectors have to be established or strengthened as a key element contributing to reshaping and promoting sustainable food systems. Particular attention has to be paid to those partnerships and platforms that are already promoting multistakeholder efforts for improved nutrition **[and sustainable food systems]** at country level, such as the Scaling Up Nutrition (SUN) Movement, **[the One Planet (10YFP) Sustainable Food Systems (SFS) Programme and others]**. Actions should be taken to improve partners' capacity to design, manage and participate in these partnerships, to ensure transparency and accountability and promote good governance as a way to ensure effective results.*