

**Title: CFS - VGFSyN**  
**Contact point: [silke.stallkamp@diplo.de](mailto:silke.stallkamp@diplo.de) , [damien.kelly@eu.europa.eu](mailto:damien.kelly@eu.europa.eu);**  
**(6 February 2020) – Matrix Final**

Message to CFS: Comments made in the «**General comments of the EU and its Member States**» (submitted to CFS Secretariat on Jan. 29<sup>th</sup> 2020) are the very important frame of reference for this detailed spreadsheet and have therefore not been repeated in the following document.

Where we propose text changes on a paragraph, we rewrite it putting in **bold** proposed additional text and in ~~strikethrough~~ suggested deletions. Any additional comments are labelled as such.

#### **Horizontal comments**

1. Throughout the document: Several definitions are not consistent, a careful review is needed. (Specifically, the terms “healthy/unhealthy food”, “healthy/unhealthy diets”, “ultra/highly processed food”, “nutritious food”, are currently undergoing further internal EU discussion. Comments on these will be provided at a later stage.)
2. Throughout document: remove “and” in “Sustainable [and] healthy diets” + consistency in terminology! [would be in line with FAO/WHO, 2019].
3. “Nutrition-sensitive” as a concept should be clearly defined and regarded as a mainstream agenda.
4. “Nudging” would be a useful approach to influence peoples’ behavior in several policy actions. This means creating environments that direct people towards sustainable and healthy choices, taking into account different other aspects of the food environment that influence people’s choices, like the ability to prepare sustainable and nutritious food that is culturally and religiously appropriate.
5. The cornerstones of a good nutritional status are a healthy diet, good sanitation but also physical activity. Physical activity is not mentioned if not in reference to education, and no policy actions are presented in this context.
6. The document should give an indication of which actions are priorities.
7. The document places more emphasis on nutrition than food systems, which should be further elaborated.
8. Text should be less UN-centred and refer more to other food system stakeholders.
9. Humanitarian settings should on occasion be considered throughout the document where relevant, not only in 3.6.
10. References should be made in the document to the empiric evidence for the negative impact of food marketing strategies, particularly on children (e.g. reference evidence on the impact of public policies regarding proximity of fast-food outlets close to schools).
11. Which obligations will arise for the Rome Based Agencies and how these can be fulfilled “within existing resources” should be highlighted more clearly. It would therefore be advisable to also critically question the role of/the division of labour among the RBAs concerning these guidelines (how should they participate in their implementation, will the FAO possibly play a leading role here?)
12. The VG should give more emphasis to the innovative character of food systems. This requires creating new business models, as well as new management and organization capabilities. The document should elaborate more on the possible scenarios of food system changes in the future

and the application of new technologies.
13. Highlight that it is important to promote business models which lead to increased production and consumption of food in terms of security, quality, nutrition and sustainability, and that minimize food losses and waste. It is important to engage with the business sector from the start in order to incorporate their knowledge of early in the process-
14. Qualify the term “Youth” by spelling out ‘young men and women’, or policy imperatives may translate to either (young) men or women along conventional labour division. The same needs to be considered for children (i.e. spell out girls and boys).
15. Seek further emphasis on the need for well resourced and functioning extension services.
16. Welcome the mention of biodiversity, however note that the terminology is not used in line with CBD, thus preferring the terminology to be “biodiversity and its ecosystem services”.
17. Communication should not just focus on the negative challenges of climate change on food systems but should also emphasise that a transformation in food systems, food production and diets can lead e.g. to reduced greenhouse gas emissions and better health for individuals.
18. It would seem useful to go beyond the CFS context, including other important deliverables on the issue from other <i>fora</i> , namely from WHO and WTO, but also on the sustainability side, from UNEP or the Rio’s Conventions.
19. Two main important issues regarding Food Systems and Nutrition are missing in the background chapter: food loss/waste and gender inequality, even though they are well addressed in the following sections (as in the case of gender inequality). We therefore suggest including two more paragraphs to introduce each one (before paragraph 15): <ol style="list-style-type: none"> <li>1. Food loss and waste. A text warning about the importance of avoiding food loss and waste and investigating at which stage of the food chain this occurs is needed. The need to assess global food waste in today’s society has grown over the last decade. Also saying that this has been partly driven by the need to link waste and global malnutrition and highlight its scale, but also to reduce all-natural resources (water, land...) used and GHG emissions associated with the waste products.</li> <li>2. Gender inequality. A separate paragraph introducing its roots and causes, explaining the gender equality problem and women and girls' empowerment, both in rural and urban communities, seems to be crucial in this chapter.</li> </ol>
20. Also in these subchapters, the VGFSyN have to address more properly how new technologies (such as the use of Big Data, smart agriculture, new irrigation techniques...) can be more accessible to low-income farmers, population, and regions worldwide. Finally, these subchapters should take into account that for many regions with mostly family and subsistence agriculture, it would be extremely important that agriculture continue being performed taking into account the Right to Food approach, more in line with international instruments like the Paris Agreement – and more interconnection with the Nationally Determined Contributions (NDCs) – or the United Nations Declaration on the Rights of Indigenous Peoples, as well as the current Decade of Family Farming.
21. The document could also gain strength and consistency if it would distinguish more prominently the various aspects of the food system approach, e.g. the role of food environments (encompassing key actors in supply chains, such as retailers en food-processing companies, but also political, societal, research, educational, financing and informal organizations such as families, friends and other social relations that people maintain and that influence the food choices they make), cultural traditions and preferences (what is normal food, and what is not, a question that is answered in different ways across the globe). These three factors are important in shaping consumption patterns and diets.
22. Diets should be a more prominent issue in the document. Diets are crucial for sustainability, affecting/implicating land use and its impact on soils

(quality), fresh water (use, availability), forests and biodiversity (both quantity and variety); greenhouse gas emissions, climate change, and its repercussions through weather conditions on soil, water supplies, nature, biodiversity and other ecosystems that we need to preserve for future food security; and so on.
23. The notion of decent income is included but could feature more prominently in the document given the current challenges around this issue.
24. We would like, in particular, to see more emphasis on smallholder farmers and family farms.
25. We would like to see more on the structure of supply chains and of food systems at the local level. We support territorialized food systems that are economically and socially inclusive, based on the active participation of all actors in the system, and able to respond to local nutrition needs and cultural food preferences. The document should help identify the tools most likely to facilitate the construction of sustainable supply chains, as well as their strengths and limitations (guarantee systems, labels, contractualisation of exchanges, fair trade, corporate social responsibility, etc.)
26. With regard to climate change, the document mostly addresses the adaptation dimension. While this is an important issue, we believe that it should further elaborate on the need and opportunities for food systems to substantially contribute to climate change mitigation. It should be consistent with the main findings of the last IPCC <i>Special report on Climate Change and Land</i> , especially the key role of sustainable land management and its definition.
27. The crucial need for more research on food systems to tackle the challenges ahead is mentioned but restricted to some specific topics. We consider that one of the major challenges of research for the transformation of food systems is to define methodologies that take into account the interconnections between the food, nutritional, economic, social, behavioral and environmental dimensions and thus enable the assessment of the cross-sectional impacts of the policies implemented. It is also necessary to understand the complexity of the interactions between supply and demand at different scales, from the individual or household to the territory. There is an urgent need to simultaneously take into account the health of individuals, animals and ecosystems in a "One Health" approach. It is also important to pursue and deepen research on emerging themes. Public policies should support these efforts, including financially.
28. <u>Throughout document</u> : Replace “reshaping” with “transforming”.

	<b>Text of Draft One</b>	<b>Proposed comments/text proposals for submission to the CFS Secretariat</b>
	<b>PART 1 - INTRODUCTION</b>	Some references can be added as guidance, in another paragraph, different from those of CFS reports (paragraph 26). Some of them are included in point 16 of chapter 1.1. Especially the ones about: the UN Decade of Action on Nutrition (2016-2025), the Second International Conference on Nutrition (ICN2), and include also a new one; The Global Launch of the United Nations Decade of Family Farming (2019-2028).
<b>1.1</b>	<b>BACKGROUND AND RATIONALE</b>	
<b>1.1</b>		PART 2 could be merged with PART 1. Proposed new structure: 1.1 Background and rationale

		<p>1.2 (ex-2.1) Key concepts concerning food systems and nutrition  1.3 (ex-2.2) Guiding principles for <del>reshaping</del> <b>transforming</b> or promoting sustainable food systems  1.4 (ex-1.2) Objectives and purpose  1.5 (ex-1.3) Nature of the VG and their intended users</p> <p><u>Comment:</u> Add general paragraph on the major role of nutrition in improving people's health and wellbeing (nutrition is not a goal in itself!)</p> <p><u>Comment:</u> 2.-7.: Include some relevant data to highlight problems related to malnutrition worldwide and underline urgency of necessary actions [e. g. "more than 820 million people in the world were still hungry in 2018. In addition, the relative rate of increase in the prevalence of obesity between 2000 and 2016 has been even faster than that of overweight: more than doubled among children and adolescents over this time period."]</p>
1.1	<p>1. Malnutrition in all its forms – undernutrition, micronutrient deficiencies, overweight, and obesity – has become one of the major global challenges that countries face today. Malnutrition in at least one of its forms affects every country in the world and most countries are affected by multiple forms. This represents a major impediment to achieving global food security<sup>1</sup>, the realization of the right to adequate food, and the implementation of the 2030 Agenda for Sustainable Development. The impacts of malnutrition and its various manifestations have profound consequences on people's health and wellbeing, physical and cognitive development, lives and livelihoods throughout their lifetimes and from one generation to another.</p>	<p>Add reference to <b>FAO definition of food security to footnote 1: "FAO. 1996. Rome Declaration on World Food Security and World Food Summit Plan of Action. World Food Summit 13 – 17 November 1996. Rome"</b></p>
1.1	<p>4. Overweight and obesity represent major risk factors globally for diet-related NCDs such as cancer, cardiovascular disease, and diabetes, as well as chronic respiratory diseases. While undernutrition is still the main form of malnutrition among children under five, overweight and obesity are increasingly prevalent among school-aged children, adolescents and adults.</p>	<p><u>Comment:</u> The document could better mention the fact that undernutrition early in life – and even in utero – may predispose to overweight and non-communicable diseases later in life.</p>

1.1	6. Malnutrition in all its forms has many interrelated and underlying causes that need to be addressed simultaneously. Among them, the lack of stable access to healthy and safe diets and safe drinking water, inadequate infant and young child-caring and feeding practices, poor sanitation and hygiene, insufficient education and health services, and low socio-economic status.	<p>6. Add to end of subpara "[...]and <b>discrimination and marginalization of certain groups.</b>"</p> <p><u>Comment:</u> The causes of malnutrition listed in this para are all at the household level. Although they are all relevant, underlying root causes and factors should be mentioned.</p> <p><u>Comment:</u> Suggest the limitations of the guidelines are mentioned explicitly. Other measures – e. g. reinforcement of the health system and poverty reduction – are crucial for tackling the issue. Language should be included to clearly define whether this falls in the document’s remit.</p> <p><u>Comment:</u> Also mention the importance of women's primary school attendance (strong association between women's primary school attendance and nutritional status of the children).</p>
1.1	7. Poverty and inequality are important underlying causes of hunger and malnutrition in all its forms. Economic slowdowns and downturns have significant impacts on employment rates, wages, incomes, and purchasing power with negative consequences on nutrition and health. These limit the capacity of national governments to ensure the provision of essential social services and the delivery of health care. In this context, inequality influences income and asset distribution, determines marginalization and social exclusion, and further increases the vulnerability of the most affected to malnutrition.	<p><u>Comment:</u> This assumption, while central for targeting malnutrition, is not fully reflected in the body of the text, particularly in section 3.3, where structural constraints to access and availability, due to poverty and exclusion are not taken into account sufficiently.</p>
1.1	8. The most affected by malnutrition in all its forms typically includes those with increased nutrient requirements and those who have less control over their choice of diet, including young and school-aged children, adolescents, pregnant and lactating women, the elderly and disabled people. In addition, urban poor, indigenous people, peasants, rural poor, agriculture and food chain workers, upland and remote communities, and displaced people are particularly vulnerable to malnutrition because of their persistent or temporary	<p>8. Add "[...]remote communities <del>ethnic and other minorities</del> <b>other vulnerable communities</b> and displaced people [...]"</p>

	poverty.	
1.1	9. Complex and protracted crises also have both immediate and long-term adverse consequences on the nutritional status of impacted populations, particularly pregnant and lactating women and children under five. Conflicts, fragility, and susceptibility to natural disasters pose a major global threat not only to the functioning of food systems and their ability to deliver sustainable and healthy diets but to the implementation of the 2030 Agenda as a whole.	9. Add "[..]of the 2030 Agenda <b>for Sustainable Development</b> as a whole."
1.1	10. Climate change, agriculture, and nutrition are interconnected. Climate change and variability affects temperature and precipitation, as well as the frequency and severity of extreme weather events. Increases in temperature, heat waves, and droughts impact agriculture, with the largest effects being decreased crop yields and livestock productivity, as well as declines in fisheries and agroforestry in areas already vulnerable to food insecurity. Climate change affects food quantity, quality, safety and ultimately food prices, with significant implications for availability of healthy diets.	10. Climate change, agriculture, and nutrition are interconnected. Climate change and variability affects temperature and precipitation, as well as the frequency and severity of extreme weather events. Increases in temperature, heat waves, and droughts impact agriculture, with the largest effects being decreased crop yields and livestock productivity, as well as declines in fisheries and agroforestry in areas already vulnerable to food insecurity. Climate change affects food quantity, quality, safety and ultimately food prices, with significant implications for availability of healthy diets. <b>Agriculture and nutrition are not only affected by climate change but also risk being contributors to it through unsustainable practices.</b>
1.1	11. Unhealthy diets represent one of the major risk factors for malnutrition and its related health outcomes. Food systems have become more interconnected from global to local levels, with longer, more complex food supply chains. The enhanced interconnectedness of people and places, globalization, urbanization, and the overabundance of cheap, convenient and often ultra-processed food and beverage, are important determinants of shifts in consumer behaviour toward unhealthy diets. Such dietary shifts have been associated with increasing prevalence of overweight, obesity and NCDs worldwide. An individual's food choices have impacts that resonate far beyond themselves: diets reflect larger systemic issues that impact population, health, sustainability, and justice.	<i>Message to CFS: paragraph is under internal discussion within the EU and its Member States. Further comments will be provided at a later stage in the negotiations.</i>
1.1	12. Current global food systems, with their excessive consumption	12. Current global food systems, with their excessive consumption and

	<p>and waste patterns, are unsustainable. They are inefficient in resource utilization, including labor and energy, and lead to environmental degradation. Current global dietary trends are negatively impacting the world’s natural resources, biodiversity, and ecosystems in the context of population growth and pressure. Food systems can be also characterized by inequitable power concentration and imbalances failing to deliver benefits for all. Changes are needed within and across food systems, with the aim to generate positive outcomes along the three dimensions of sustainability – social, economic, and environmental.</p>	<p>waste patterns, are unsustainable. They are <b>varied, as shown by the 2017 CFS High Level Panel of Experts Report <i>Nutrition and Food Systems</i>. Different systems show their limits in terms of sustainability and inefficiency</b> are inefficient in resource utilization, including labor and energy, and lead to <b>excessive consumption and waste patterns, leading to environmental degradation, especially of soils and water, and loss of biodiversity (especially pollinators). In this context, one of the biggest challenges is to reverse</b> <del>current</del> <b>food systems, including</b> global dietary trends, are negatively impacting the world’s natural resources, biodiversity, and ecosystems in the context of population growth and pressure. Food systems can be also characterized by inequitable power concentration and imbalances failing to deliver benefits for all. Changes are needed within and across food systems, with the aim to generate positive outcomes along the three dimensions of sustainability – social, economic, and environmental.</p> <p><u>Comment:</u> 12. This para should reference diets in light of their impact on land use and GHG emissions.</p>
1.1	<p>13. Fostering policy, institutional and behavioural changes among food system actors is key to reshaping or promoting sustainable food systems that improve nutrition and enable sustainable and healthy diets that meet the evolving dietary needs of growing populations. In order to be effective and sustainable, food system-related policies need to focus on their economic, social, environmental, nutritional and health consequences, paying special attention to the poorest and most nutritionally vulnerable, and addressing barriers they face in accessing sustainable and healthy diets.</p>	<p>13. Fostering policy, institutional and behavioural changes among <b>all</b> food system <del>actors</del> <b>stakeholders (not only consumers)</b> is key to <del>reshaping</del> <b>transforming</b> or promoting sustainable food systems that improve nutrition and enable sustainable and healthy diets, that meet the evolving dietary needs of growing populations. In order to be effective and sustainable, food system-related policies need to focus on their economic, social, environmental, nutritional, health <b>and animal welfare</b> consequences, paying special attention to the poorest and most nutritionally vulnerable, and addressing barriers they face in accessing sustainable and healthy diets.</p>
1.1	<p>14. New policies are required to address policy fragmentation and its subsequent negative impact on nutrition, ones that are designed and coordinated across sectors such as health, agriculture and food systems, education, environment, water, sanitation, gender, social protection, trade, employment, and finance – all of which impact nutrition outcomes.</p>	<p>14. New policies are required to address policy fragmentation and its subsequent negative impact and address the subsequent negative impact on nutrition. <b>These policies should be</b> <del>ones that are</del> designed and coordinated across sectors such as health, agriculture, <b>forestry, fisheries</b> and food systems, education, environment, water, sanitation, gender, social protection, <b>animal welfare</b>, trade, employment, and finance – all of which impact nutrition outcomes.</p>
1.1	<p>16. This policy process is taking place at the same time as a variety of</p>	<p>16. Add to the end of para: ", and the same attention is expected to be</p>

	<p>organizations from different sectors are addressing malnutrition. Food systems and nutrition have received increased attention from the global community, including the United Nations (UN) and its Member States, and is recognized as an essential component of achieving the goals of the 2030 Agenda for Sustainable Development. In 2014, at the Second International Conference on Nutrition (ICN2), Members of the Food and Agriculture Organization (FAO) and the World Health Organization (WHO) committed to ending hunger and malnutrition in all its forms. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025) and called upon FAO and WHO to lead its implementation, in collaboration with the World Food Programme (WFP), the International Fund for Agricultural Development (IFAD), and the United Nations Children’s Fund (UNICEF), using multistakeholder platforms such as CFS. Specific attention on nutrition was given by a number of UNGA Resolutions, the UN Economic and Social Council (ECOSOC), the UN Environment Assembly, the World Health Assembly (WHA) and the UN Special Rapporteur on the Right to Food.</p>	<p>given to <b>the UNSG 2021 Food Systems Summit.</b>"</p> <p><u>Comment:</u> 16. Only refers to UN. Add references to initiatives carried out by states, civil society, and the private sector, as well as initiatives from multi-stakeholder coalitions.</p>
<p><b>1.1</b></p>	<p>17. The VGFSyN are expected to contribute to and complement these international initiatives with a view to promoting policy coherence. They will provide evidence-based guidance to help countries operationalize ICN2’s Framework for Action recommendations in support of the progressive realization of the right to adequate food in the context of national food security and of the right to health, and of the achievement of SDG 2, with particular attention to targets 2.1, 2.2 and 2.4. In addition, the VGFSyN should have an essential role in assisting countries to achieve a number of other related SDGs (SDG 1, 3, 4, 5, 6, 8, 10, 12).</p>	<p><u>Comment:</u> Should include reference to the fact that the Global Sustainable Development Report 2019 identified "Food systems and nutrition patterns" as one of the six entry points that can accelerate progress towards the SDG.</p> <p>+ more emphasis on SDG12 [Ensure sustainable production and consumption patterns.] at the end of para.</p>
<p><b>1.2</b></p>	<p><b>OBJECTIVES AND PURPOSE</b></p>	
<p><b>1.2</b></p>	<p>18. The VGFSyN are intended to be a reference point that provides evidence-based guidance mainly to governments, specialized institutions and other stakeholders, including international organizations, on effective policies, investment and institutional arrangements that will address malnutrition in all its forms from a food systems perspective.</p>	<p>18. Add "[..] to governments, specialized institutions, <b>private sector</b> and other stakeholders, including [..]"</p>

1.2	19. The objective of the VGFSyN is to contribute to reshaping or promoting food systems to ensure that the food that contributes to sustainable and healthy diets is available, affordable, acceptable, safe, and of adequate quantity and quality while conforming “with beliefs, culture and traditions, dietary habits, and preferences of individuals, in accordance with national and international laws and obligations”.	19. Add "[...] affordable, <b>accessible</b> , acceptable [...]".
1.2	21. Food systems are integrally connected with issues related to trade and investment, food safety, climate change, biodiversity and genetic resources, among others, which are all addressed in dedicated normative intergovernmental processes. Different actors dealing with these matters need to refer to, and build upon, existing international commitments, promoting coherence and addressing the current policy fragmentation, without duplicating efforts or moving beyond their mandates.	<u>Comment:</u> 21. The fundamental importance of preserving biodiversity, considering the ecosystem services it provides, in a context of climate change and depleted natural resources is another point that could be further highlighted. Plant genetic resources are a global public good: preserving them is vital for the future. Collections by species, in situ and ex situ conservation, at the national and international levels, and facilitated access to <b>and sharing benefits of</b> these collections under the Multilateral System of the International Treaty on Plant Genetic Resources for Food and Agriculture, are some of the tools that can help preserve biodiversity
1.2	24. The functionality of food systems and their ability to deliver sustainable and healthy diets is influenced by a number of drivers which indicate that, in order to improve nutrition, context specific changes are needed not only in agriculture and food policy but also in development priorities, economic policies, and social norms. These drivers can be categorized as follows:	
1.2	a) biophysical and environmental (natural resource and ecosystem services, biodiversity, climate change, water, and soils);	
1.2	b) innovation, technology, and infrastructure;	b) innovation, <del>technology</del> <b>research, extension services</b> and infrastructure
1.2	c) political and economic (leadership, globalization, foreign investment, trade, food policies and regulatory frameworks, land tenure, conflicts, and humanitarian crises);	24 c) Add "[..], globalization, <b>poverty and inequalities</b> , foreign investment, [..]"
1.2	d) socio-cultural (culture, religion, rituals, social traditions, poverty, inequalities, and women’s rights and empowerment);	d) socio-cultural (culture, <b>education</b> , religion, rituals, social traditions, poverty, inequalities, and women’s rights and empowerment);

1.2	e) demographic drivers (population growth, age distribution, urbanization, migration, and forced displacement).	
1.3	<b>NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS</b>	
1.3	<p>26. The VGFSyN are expected to build upon and complement related guidance contained in other CFS products, and are intended to avoid duplication of the work and mandate of other international bodies. In order to ensure policy coherence, specific attention should be paid to:</p> <ul style="list-style-type: none"> <li>• CFS Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of the national food security (2004),</li> <li>• CFS Voluntary Guidelines on the responsible governance of tenure of land, fisheries and forests in the context of national food security – VGGT (2012),</li> <li>• CFS Principles for responsible investment in agriculture and food systems – RAI (2014), and</li> <li>• CFS Framework for Action for food security and nutrition in protracted crises – FFA (2015)</li> <li>• CFS Policy Recommendations on Connecting Smallholders to Markets (2016).</li> </ul>	<p>26. Add following bullet points</p> <ul style="list-style-type: none"> <li>• <b>CFS HLPE Agroecological and other Innovative Approaches (2019) and the related policy convergence process</b></li> <li>• <b>CFS Policy Recommendation on Food Losses and Waste in the context of Sustainable Food Systems (2014)</b></li> <li>• <b>FAO The Ten Elements of Agroecology (2018))</b></li> <li>• <b>CFS Policy Recommendation on Water for Food Security and Nutrition (2015)</b></li> <li>• <b>CFS Policy Recommendation on Sustainable agricultural development for food security and nutrition: what roles for livestock? (2016)</b></li> </ul>
	<b>PART 2 – KEY CONCEPTS AND GUIDING PRINCIPLES</b>	<u>Comment</u> : PART 2 - Include a definition of the links between malnutrition and food security.
2.1	<b>KEY CONCEPTS CONCERNING FOOD SYSTEMS AND NUTRITION</b>	
2.1	<b>28. Food systems</b> “gather all the elements (environment, people, inputs, processes, infrastructures, institutions, etc.) and activities that relate to the production, processing, distribution, preparation and consumption of food, and the output of these activities, including socio-economic and environmental outcomes”.	<u>Comment</u> : the definition of “food systems” is based on a 2014 report by the High Level Panel of Experts on food security and nutrition. However, a more recent definition is given in the <u>FAO Sustainable Food Systems Concept and Framework</u> , which we believe is more comprehensive and appropriate.

2.1	<p><b>30. Sustainable and healthy diets</b> <i>“promote all dimensions of individuals’ health and wellbeing; have low environmental pressure and impact; are accessible, affordable, safe and equitable; and are culturally acceptable. The aims of sustainable [and] healthy diets are to achieve optimal growth and development of all individuals and support functioning and physical, mental and social wellbeing at all life stages for present and future generations; contribute to preventing all forms of malnutrition (i.e. undernutrition, micronutrient deficiency, overweight and obesity); reduce the risk of diet-related NCDs; and support the preservation of biodiversity and planetary health. Sustainable [and] healthy diets must combine all the dimensions of sustainability to avoid unintended consequences”.</i></p>	<p><u>Comment:</u> 30. Although the sustainable healthy diet is profoundly defined (30), introducing the term <b>‘balanced diet’</b> and explaining the meaning thereof, could benefit the report and aid in achieving its targets.</p>
2.2	<p><b>GUIDING PRINCIPLES FOR RESHAPING OR PROMOTING SUSTAINABLE FOOD SYSTEMS</b></p>	<p>New heading proposal: GUIDING PRINCIPLES FOR <del>RESHAPING</del> <b>TRANSFORMING</b> OR PROMOTING SUSTAINABLE FOOD SYSTEMS</p>
2.2	<p>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 policies, mechanisms, instruments and investment that aim to advance the goals of the 2030 Agenda for Sustainable Development.</p>	<p>32. Food systems serve and support multiple objectives within the <del>three</del> <b>economic, social and environmental</b> dimensions of sustainable development. While food systems might differ greatly, they offer important opportunities for public <del>and private</del> <b>public and private</b> mechanisms, instruments and <b>responsible</b> investment <del>that aim to advance the</del> <b>that aim to advance the achievement of the</b> goals of the 2030 Agenda for Sustainable Development.</p>
2.2	<p>34. These guiding principles are:</p>	<p>34. <u>Comment:</u> Revise subpara order, e. g. move 34 g) further up the list.</p> <p><u>Comment:</u> 34. It would be important to consider capacity building not only for stakeholders who are already involved in nutrition and food systems but in particular those working in sectors with a less obvious impact on nutrition.</p> <p><u>Comment:</u> 34. We would like to see the human rights based approach added to the guiding principles for these guidelines.</p>

2.2	34 a) <b>Systemic, holistic and evidence-based approach.</b> Promote a systemic, multi-sectoral, and science and evidence-based approach that considers food systems in their totality, integrates indigenous and traditional forms of knowledge, seeks to simultaneously maximize outcomes across all sustainability dimensions, and looks at the multidimensional causes of malnutrition in all its forms.	Reshape heading: "Systemic, holistic and evidence and <b>science-based</b> approach."  34 a) <u>Comment</u> : Add reference to family agriculture and its potential for preserving biodiversity and developing resilient traditional food systems.
2.2	34 d) <b>Healthy people, healthy planet.</b> Promote policies that enhance the livelihoods, health, and well-being of the population, ensuring sustainable food production and consumption as well as the protection of biodiversity and ecosystems.	d) <b>Healthy people, healthy planet.</b> Promote policies that enhance the livelihoods, health, and well-being of the population, ensuring sustainable food production and consumption as well as the protection of <b>climate</b> , biodiversity and ecosystems, <b>and ensuring mitigation of and adaptation to climate change.</b>
2.2	34 e) <b>Gender equity and women's empowerment.</b> Promote gender equity 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 food systems that improve nutrition, given their key role in care, education, health promotion and food consumption.	<u>Comment</u> : e) Replace "equity" with " <b>equality</b> " [consistently with SDG 5] + Add to end of para "[...] food consumption <b>and production.</b> " ."  <u>Comment</u> : 34 e) + 3.3 heading + 3.5 heading + 3.5.3: Gender <b>equality</b> rather than <b>equity</b> . [Equity/Equitable: about <i>needs</i> , not <i>rights</i> ]
2.2	34 f) <b>Nutrition knowledge and awareness.</b> Strengthen nutrition education, knowledge and literacy at individual and community levels to facilitate producers', food processors' and consumers' decisions and to foster informed choices about food products for sustainable and healthy dietary practices. Health professionals, especially, should be trained on nutrition.	34 f) <b>Nutrition knowledge and awareness.</b> Strengthen <b>food and</b> nutrition education, knowledge and literacy at individual and community levels to facilitate producers', food processors' and consumers' decisions and to foster informed choices about food products for sustainable and healthy dietary practices. Health <b>and agro-food</b> professionals, especially, should be trained on nutrition.  <u>Comment</u> : f) The holistic approach could be to strengthen food system knowledge and education.
2.2	34 g) <b>Realization of the Right to Adequate Food.</b> Promote the progressive realization of the right to adequate food in the context of national food security going beyond ensuring minimum requirements and including access to food that is nutritionally adequate.	g) <b>Realization of the Right to Adequate Food.</b> Promote the progressive realization of the right to adequate food in the context of national food security going beyond ensuring minimum requirements and including <b>non-discriminatory</b> access to <b>and affordability of</b> food that is nutritionally adequate, <b>with a focus on vulnerable groups.</b>

		<u>Comment:</u> 34 g) Move further up in the list.
<b>2.2</b>	34 h) <b>Capacity building.</b> Strengthen human and institutional capacities, particularly among nutrition and food system actors, to reshape food systems to deliver sustainable and healthy diets, and to promote adequate food habits.	<u>Comment:</u> 34 h) Add reference to access to technology and knowledge sharing between different actors and stakeholders.
<b>2.2</b>		<u>Add new paragraph</u> ("guiding principle" 34 e) " <b>Animal welfare in agricultural production. Ensure animal welfare –in all farming systems.</b> " (with subsequent adjustment of lettering order)
	<b>PART 3 – VGFSyN</b>	<u>Comment:</u> Wording in 6 sections should reflect wording in the topic for each section below (as in Ms Ortega cover letter).
	37. This part is structured around the following six main sections: <ul style="list-style-type: none"> <li>• on governance of food systems which underpins and cuts across the other five sections;</li> <li>• on food supply chains which determine the availability of safe and nutritious food;</li> <li>• on actions to be taken to ensure accessibility of sustainable and healthy diets;</li> <li>• on the notion that people are central to nutrition knowledge and education;</li> <li>• on women’s empowerment in food systems - as they are often the most vulnerable - but with great potential for reshaping food systems for the future;</li> <li>• on humanitarian contexts.</li> </ul>	37. Add "in the context of climate change" to the bullet point "on food supply chains which determine the availability of safe and nutritious <b>food</b> " (2 <sup>nd</sup> bullet point).
<b>3.1</b>		<u>Comment:</u> <b>The section provides relevant recommendations, which would benefit from further sharpening and avoiding</b> repetitive paragraphs. Recommend making specific and explicit examples + describing more concrete policies/actions.
<b>3.1</b>	38. This part of the VGFSyN addresses the governance of food systems for enhancing nutrition. It covers issues of leadership and accountability, from global to local levels, across food systems.	<u>Comment:</u> 38. Throughout section 3.1.1 – Is food waste included in "consumption"? If not, food waste should be mentioned specifically.
3.1.1	<u>Building on multi-sectoral actions and coordination</u>	<u>Comment:</u> Need to mention the importance of managing power dynamics <b>and imbalances</b> to ensure a productive multistakeholder

		<p>dialogue.</p> <p><u>Comment:</u> need to make the role <b>and responsibility</b> of the private sector in influencing consumer behaviour explicit. Add reference to SDG17.</p>
3.1.1	<p>a) States should facilitate an inclusive dialogue ensuring the participation of a range of stakeholders working with or in food systems, including national and international organizations from civil society, indigenous people, the private sector, the UN, donors and national researchers. This dialogue should cover all dimensions of food systems, including production, distribution, marketing and consumption. Marginalized and the most vulnerable social groups should participate in the process of defining policies and strategies at national and local levels to prevent and combat hunger and malnutrition.</p>	<p>a) States should facilitate an inclusive dialogue ensuring the participation of a range of stakeholders working with or in food systems, including <del>national and international</del> organizations from civil society, indigenous people, the private sector, <del>the UN, donors and national</del> researchers, <b>and local communities</b>. This dialogue should cover all dimensions of food systems, including production, <b>production</b>, distribution, marketing and consumption. Marginalized and the most vulnerable social groups should participate in the process of defining policies and strategies at national and local levels to prevent and combat hunger and malnutrition.</p>
3.1.1	<p>b) Considering the pivotal role of the private sector in the production, distribution and sale of food, States should facilitate an inclusive dialogue with the private sector to build strategies that improve food environments.</p>	<p>b) Considering the pivotal role <b>and responsibility</b> of the private sector in the production, <b>processing and</b> distribution and sale of food <b>and invoking corporate social responsibility</b>, States should facilitate an inclusive dialogue with <b>and create appropriate policy incentives for</b> the private sector to build <b>and implement</b> strategies that improve food environments.</p> <p><u>Comment:</u> b) The dialogue with the private sector should include (besides strategies that improve food environments) also the ones aiming to improve the nutritional value of food).</p>
3.1.1	<p>c) States and inter-governmental organizations should encourage increased financial investment to support food systems that deliver sustainable and healthy diets.</p>	<p>c) States and inter-governmental organizations should encourage increased <del>financial</del> <b>responsible</b> investment to support <b>sustainable</b> food systems that deliver sustainable healthy diets.</p>
3.1.2	<p><u>Promoting policy coherence by integrating nutrition into national development</u></p>	<p><u>Comment:</u> Introduce a concept of “nutrition in all policies” (derived from the health in all policies approach) that integrates and articulates nutrition considerations into policymaking across sectors to improve nutrition of all communities and people.</p> <p><u>Comment:</u> Recommend actions that have the potential to improve nutrition outcomes across the spectrum of malnutrition, through integrated initiatives, policies and programmes.</p>

		<u>Comment:</u> We also suggest including a reference to the social sectors, for example, "should be complemented by increased (sufficient) budgetary allocations to food system, health and social protection activities that relate to improving diets and nutrition".
3.1.2	a) States should align policies that affect nutrition across sectors, ministries and agencies, and strengthen legal frameworks and institutional capacities to deal with the multiple causes and consequences of malnutrition. This can be done by establishing or strengthening multi-sectoral, multistakeholder mechanisms that oversee the implementation of evidence-based policies, strategies and interventions.	Add: "[...] the implementation of evidence <b>and science</b> -based policies, strategies and interventions."
3.1.2	b) States should integrate food system approaches that promote nutrition in national development, health, economic, and disaster risk reduction plans. This should be complemented with increased budgetary allocations to food system activities that relate to improving diets and nutrition, and transparent indicators to track and assess the full cost of addressing malnutrition in all its forms.	b) States should integrate food system approaches that promote nutrition in national development, health, economic, <b>agriculture</b> , and disaster risk reduction plans. This should be complemented with increased budgetary allocations to food system activities <del>that relate to</del> <b>with the clear objective of</b> improving diets and nutrition, and transparent indicators to track and assess the full cost of addressing malnutrition in all its forms.  <u>Comment:</u> b) "full cost" also means tracking and assessing (monitoring) the food environment and changes in the food environment.
3.1.2	c) States should foster policy coherence across sectors to reduce all forms of malnutrition. These sectors include agriculture, environment, energy, water, sanitation, hygiene, health, education, fiscal policies, trade, investment, and economic and social development.	c) States should foster policy coherence across sectors to reduce all forms of malnutrition. <b>States should ensure high priority for sustainable food systems in order to effectively align relevant sectors around this goal.</b> These sectors include agriculture, <b>rural development, forestry, fisheries</b> , environment, energy, water, sanitation, hygiene, health, education, fiscal policies, trade, investments, <b>urban/territorial planning</b> and economic and social development.
3.1.3	<u>Instituting accountability mechanisms, monitoring and evaluation</u>	<u>Comment:</u> This subsection should include references to global food price volatility. + include new para: " <b>State should promote and improve research and innovation within sustainable food systems, in order to achieve better mechanisms and evaluation systems for transparent, democratic and accountable governance of them.</b> "
3.1.3	a) States should institute strong and transparent accountability	a) Add "[...] compliance and performance, <b>individual complaint</b>

	mechanisms that pertain to different food system actors. These mechanisms should promote good governance, public deliberation, independent bodies monitoring compliance and performance, remedial actions to improve accountability, and capacity to manage conflicts of interest and settle disputes that may undermine public health.	<b>procedures</b> , remedial actions [...]"
3.1.3	b) States should ensure that multilateral and bilateral trade and investment agreements are consistent with nutrition, food and agriculture national policies and favour the transition towards more sustainable food systems, assessing how the health, environmental, social and economic outcomes of food systems are likely to be affected. This should include an assessment of how competition will be impacted, and whether and how levels of concentrated market power will change.	Add "[...] of food systems are likely to be affected <b>while ensuring that international trade take into account international food safety standards (Codex, OIE standards)</b> . This should include an assessment of how competition will be impacted, and whether and how levels of concentrated market power will change."
3.1.3	c) States should improve the availability and quality of multi-sectoral information systems that capture and harmonize food security and dietary indicators (particularly the dietary intake/consumption of food for the nutritionally vulnerable), food composition, and nutrition-related data for improved policy development and accountability. States should ensure there is robust technical capacity to analyze food system information in a comprehensive manner to support the planning and monitoring of actions.	c) States should improve the availability and quality of multi-sectoral information systems that capture and harmonize food security and dietary indicators/ <b>targets</b> (particularly the dietary intake/consumption of food for the nutritionally vulnerable), food composition, and nutrition-related data for improved policy development and accountability. States should ensure there is robust technical capacity to analyze food system information in a comprehensive manner to support the planning, <del>and</del> monitoring <b>and evaluation</b> of actions.
3.2	<b>SUSTAINABLE NUTRITION-ORIENTED FOOD SUPPLY CHAINS IN THE CONTEXT OF CLIMATE CHANGE</b>	Add " <b>AND OTHER ENVIRONMENTAL CHALLENGES</b> " to the para title.
3.2.1	<u>Ensuring sustainable use and management of natural resources</u>	<u>Comment:</u> Add climate change as an overarching factor shaping preconditions such as soil, water, biodiversity; + Add a statement referring to the application of the VGGT (by <i>all</i> stakeholders).  <u>Comment:</u> In these subchapters, the VGFSyN have to address more precisely how innovative technologies (such as the use of Big Data, smart agriculture, new irrigation techniques...) can be more accessible to low-income farmers, population, and regions worldwide. These subchapters should take into account that for many regions with family and subsistence agriculture, it would be extremely important that agriculture

		continues to be performed taking into account the Right to Food approach, more in line with international instruments like the Paris Agreement – and more interconnection with the Nationally Determined Contributions (NDCs) – or the United Nations Declaration on the Rights of Indigenous Peoples, as well as the current Decade of Family Farming.
3.2.1	a) States, farmers and other food producers should ensure that soil fertility is addressed as central to agriculture production systems, because nutrient-rich soils are critical to the production of food necessary for healthy diets. States should encourage the use of ecosystem services which maintain soil biodiversity and nutrient balance, and promote carbon storage.	a) States, farmers and other food <del>producers</del> <b>system actors</b> should ensure that <b>sustainable soil fertility health</b> is addressed as central to agriculture production systems, because nutrient-rich soils are critical to the production of food necessary for <b>sustainable and</b> healthy diets. States should <del>encourage</del> <b>provide appropriate incentives for</b> the use of <del>ecosystem</del> <b>sustainable land management (SLM) services and agricultural practices</b> which maintain soil biodiversity and nutrient balance, and promote carbon storage <b>through humus-upbuild</b> .
3.2.1	b) States should ensure the management, control and sustainable use of water resources for agriculture and food production through regulation and community participatory approaches. These approaches should foster the reduction of water wastage in irrigation, ensure the systematic use of appropriate water-saving technologies, minimize water pollution stemming from agriculture, and promote the multiple uses of water (including wastewater) without compromising the ability of farmers and food producers to grow sufficient, nutritious food.	b) States should ensure the management, control and sustainable use of water resources for agriculture and food production through regulation and community participatory approaches <b>as well as water stewardship approaches involving the private sector and other stakeholders</b> . These approaches should foster the reduction of water wastage in irrigation, <del>ensure the systematic use of appropriate water-saving technologies,</del> minimize water pollution <b>and eutrophication</b> stemming from agriculture <b>(including nitrate) and other sources</b> and promote the multiple uses of water (including wastewater <b>and ensuring water sanitary safety</b> ) without compromising the ability of farmers and food producers to grow sufficient, nutritious .
3.2.1	c) States should foster the protection of biodiverse landscapes and food and agriculture production systems including crops, livestock, forestry and plantations, fisheries and sustainable aquaculture. They should encourage the adoption of practices, including agroecological approaches, that ensure that the biodiversity of landscapes, including forests, waters and coastal seas, other agro-ecosystems, and sylvo-pastoral systems, is conserved and sustainably used.	c) States should foster the protection of biodiverse landscapes and food and agriculture production systems including crops, livestock, forestry and plantations, fisheries and sustainable aquaculture. They should encourage the adoption of practices, including agroecological <del>approaches</del> <b>and other innovative approaches for sustainable agriculture</b> , that ensure that the biodiversity of landscapes, including forests, waters and coastal seas, other agro-ecosystems, and sylvo-pastoral systems, is conserved <b>or enhanced</b> and sustainably used.  <u>Comment:</u> c) “sustainable” should refer to all production systems, not only aquaculture.
3.2.1	f) States should protect the rights of indigenous people and other	<i>Message to CFS: end of paragraph is under internal discussion within the</i>

	communities with customary tenure systems that exercise self-governance of land, fisheries and forests, to land territories and resources they have traditionally owned, occupied or otherwise used or acquired. They should be provided with equitable and sustainable rights to those resources, their livelihoods should be maintained, their indigenous knowledge and practices should be valued, their access to traditional food should be protected, and their diets, nutrition and wellbeing should be prioritized.	<i>EU and its Member States. Further comments will be provided at a later stage in the negotiations.</i>
	<u>Add new paragraph</u>	Add new paragraph between e) and f): " <b>States should foster the protection of farmed animals, especially in highly productive, intense animal farming systems, during breeding, rearing, fattening, transport and slaughtering.</b> "
3.2.2	<u>Promoting nutrition within agriculture and food production</u>	<i>Message to CFS: paragraph is under internal discussion within the EU and its Member States. Further comments will be provided at a later stage in the negotiations.</i>
3.2.2	a) States should promote nutrition-sensitive agriculture and diversified food production through the integration of nutrition objectives into national food and agriculture policies.	<u>Comment:</u> a) Paramount importance of clear guidelines and indicators for the design of national food and agriculture policies!
3.2.2	b) States, private sector food actors and development partners should support and incentivize smallholders, particularly 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.	b) States, private sector food actors and development partners should support and incentivize <del>smallholders, particularly within developing countries,</del> <b>all types of producers</b> to adopt sustainable production practices and to produce diverse crops that will contribute to the availability, affordability and accessibility <del>of to</del> nutritious food, while <b>ensuring a decent income, livelihood and resilience for farmers, particularly smallholders and farm workers, especially within developing countries</b> enhancing farmers' income and livelihood <b>and resilience.</b>
3.2.2	c) States, private sector food actors and development partners should support sustainable livestock, small animal and fishery systems (including artisanal fish and other aquatic systems) because they contribute to the protection and development of livelihoods, provide income, and supply key nutrients for health and wellbeing.	c) States, private sector food actors and development partners should support sustainable livestock, small animal and fishery systems (including artisanal <del>fish and other aquatic systems</del> <b>fisheries</b> ) <b>and aquaculture</b> because they contribute to the protection and development of livelihoods, provide income, and supply key nutrients for health and wellbeing.

		<p><u>Comments:</u></p> <p>-CFS guidelines on sustainable livestock.</p> <p>-In the sense of a sustainable and healthy diet, animal products complement the menu (see also planetary health diet).</p>
3.2.2	d) States and private sector food actors should ensure farmers and other food producers have access to seeds, modern and sustainable technologies, as well as skill training and capacity development to be able to use those technologies that could improve the production and quality of crops. These include, among others, biofortified crops, through on-farm conventional breeding, and sustainable agriculture technologies including better management of pollination and nutrient cycling, as well as new technologies.	<i>Message to CFS: paragraph is under internal discussion within the EU and its Member States. Further comments will be provided at a later stage in the negotiations.</i>
3.2.2	e) States should integrate urban and peri-urban agriculture and urban land use into national and local agricultural development strategies, food and nutrition programmes, and urban planning, as a viable input into healthy diets for growing urban populations and social cohesion of communities.	e) States should integrate urban and peri-urban agriculture and urban land use into national and local agricultural development strategies, food and nutrition programmes, and urban planning, as a viable input into <b>sustainable</b> healthy diets for growing urban <b>and territorial</b> populations and social cohesion of communities.
3.2.2	f) States should invest in research and innovation for commercial development of nutritious crops, such as fruit, vegetables, healthy oils, nuts and seeds, legumes, biofortified crops, and diverse animal-sourced food, which are developed through conventional on farm breeding and are sustainable for smallholders.	<p>f) <b>The private sector, States and other relevant stakeholders</b> should invest in research and innovation for <del>commercial development of</del> nutritious crops, such as fruit, vegetables, healthy oils, nuts and seeds, legumes, <b>diverse animal-sourced food and</b> <del>biofortified crops</del>, and diverse animal-sourced food, which are developed through conventional on farm breeding and are sustainable for smallholders.</p> <p><u>Comment:</u> "healthy oils": is there an internationally recognised definition of healthy oils?</p> <p><u>Comment:</u> f) Add reference to VGGT.</p>
3.2.3	<u>Improving food storage, processing, transformation and reformulation</u>	<u>Comment:</u> Add point on valorisation of short circuits [where relevant]
3.2.3	a) States and private sector food actors should foster the development and uptake of adapted and affordable storage facilities, or invest in adequate storage, including cold storage, to allow for smallholders and food actors to have greater flexibility when they can sell their products, and to allow consumers to buy such products at	a) Reshape subpara thus: "States and private sector food actors should foster <b>and improve, in a way that is as environmentally compatible as possible</b> , the development and uptake of adapted and affordable storage facilities, or invest in adequate storage, including cold storage, to allow for smallholders and food actors to have greater flexibility <b>better</b>

	adequate prices. States should also invest in transportation and road infrastructure to ensure the production of smallholder farmers are able to reach markets. These supply chain investments should be complemented with improved and accessible information technology, training and capacity building to increase farmers' opportunities to deliver diverse, perishable, safe and nutritious food to market and for consumers to access those markets.	<b>opportunities regarding</b> when they can sell their products, <b>to reduce food loss and waste</b> , and to allow consumers to buy such products at adequate prices <b>while ensuring their safety</b> . State should also invest in <b>sustainable means of</b> transportation and road infrastructure to ensure the production of smallholder farmers are able to reach markets, <b>and rethink logistic schemes to make them more sustainable</b> . These <b>responsible</b> supply chain investments should be complemented with improved and accessible information technology, training and capacity building to increase farmers' opportunities to deliver diverse, perishable, safe and nutritious food to market and for consumers to access those markets.
3.2.3	b) States and private sector food actors, including farmers and their associations, should facilitate minimizing food and nutrient loss on farms, during post-harvest storage and throughout processing and transportation, particularly of perishable food such as fruit, vegetables, dairy, and animal source food. Facilitation includes training and capacity, management practices and fostering the adoption of appropriate technologies, such as cold chambers storage units, solar walk-ins, refrigerators and dry storage, storage drums and drying facilities.	b) States and private sector food actors, including farmers and their associations, should facilitate minimizing food and nutrient loss on farms, during post-harvest storage and throughout processing and transportation, <b>storage, retail and in private households and public catering</b> , particularly of perishable food such as fruit, vegetables, dairy, and animal source food. Facilitation includes training and capacity <b>development</b> , management practices and fostering the adoption of appropriate technologies <b>using sustainable sources of energy and materials</b> , such as cold chambers storage units, solar walk-ins, refrigerators and dry storage, storage drums and <b>green</b> drying facilities.  <u>Comment:</u> Definition of "solar walk-ins"? <u>Comment:</u> b) para should include more information/guidelines about how to fight food loss in the first parts of the food chain;  <u>Comment:</u> State and private sector food actors should attempt to quantify of current food loss across sectors and regions.
3.2.3	c) States should incentivize private sector food actors to work towards more sustainable and safe packaging of products such as nanotechnology, waxing, plant-based wrapping, and biodegradable plastics.	c) Add "States should incentivize private sector food actors to <b>reduce packaging of products and to</b> work towards more sustainable and safe packaging of products such as <b>natural waxing</b> , plant-based wrapping, <del>and biodegradable plastics</del> <b>while minimizing waste.</b> "  <u>Comment:</u> c) Avoid mentioning nanotechnology.
3.2.3	d) States should establish guidance for the use and scale-up of processing technologies that can improve the nutritional content of	<i>Message to CFS: paragraph is under internal discussion within the EU and its Member States. Further comments will be provided at a later stage in</i>

	food (fortification/biofortification), minimize nutrient post-harvest losses, and promote longer-term storage of food, particularly during periods of drought and poor production. Such technologies could include flash and solar drying, converting food to pastes and spreads, and fortification through conventional on farming breeding of staples and oils. States should set guidelines and monitor the level of processing as highly-processed food have associations with unhealthy diets, overweight and obesity.	<i>the negotiations.</i>
3.2.3	e) States should institute regulatory instruments to promote reformulation, complemented with warning labels and taxes on less nutritious food products that do not adhere to national food-based dietary guidelines.	<i>Message to CFS: paragraph is under internal discussion within the EU and its Member States. Further comments will be provided at a later stage in the negotiations.</i>
3.2.3	f) Private sector food and beverage actors should strive to meet public health goals by reformulating food to ensure less nutritious ingredients – such as sugars, salt/sodium and unhealthy fats such as trans fats – are minimized or eliminated in food and beverage products and nutritious ingredients such as fibre, fortificants, and other health promoting ingredients are increased.	<p>f) Private sector food and beverage actors should strive to meet public health goals by reformulating food to ensure less nutritious ingredients – such as <b>added</b> sugars, salt/sodium and unhealthy fats such as trans fats <b>(in particular industrially-produced trans-fats) and saturated fats</b> – are minimized or eliminated in food and beverage products and nutritious ingredients such as fibre, fortificants, <b>protein, vitamins, minerals [and] other micronutrients</b> and other health promoting ingredients are increased.</p> <p><u>Comment:</u> f) Fortification is not without upper limits for intake. This point should probably be made more generally (e. g. "Availability of nutritious foods should be increased.")</p> <p><u>Comment:</u> Refer to "saturated fats" rather than "trans fats" <b>or</b> mention both (saturated fats <b>are more often present in greater quantities</b>).</p>
3.2.4	<u>Making markets work for nutrition</u>	
3.2.4	b) States should increase public investment in market infrastructure (roads and bridges, physical markets, storage facilities), to reduce transaction costs and food market performance particularly for perishable and nutritious food.	<p>b) Add "[...] storage facilities), to <b>minimize food losses and</b> reduce transaction costs [...]"</p> <p><u>Comment:</u> What does "food market performance" mean?</p>
3.2.4	c) States and private sector actors should support smallholders to meet safety and quality standards of nutritious food that enable	c) Reshape subpara thus: "States and private sector actors should support <b>provide a policy environment to assist</b> smallholders to meet

	them to fulfill demand for the local consumption whilst reaching broader markets and getting higher profits for their products.	safety and quality standards of nutritious food that enable them to fulfil demand for the local consumption whilst <b>and to have access to</b> broader markets getting <b>possibly</b> higher profits for their products."
3.2.4		<p>Add a <b>para d) "States should encourage the development of territorial approaches, local distribution channels, the promotion of products with official labels of quality and origin."</b></p> <p><u>Comment:</u> Include <b>2 extra paras:</b></p> <ul style="list-style-type: none"> <li>- on promotion of local/traditional markets [see text proposal above]</li> <li>- on promotion of short marketing channels [supply chains?]</li> </ul> <p>These topics should further be appropriately addressed throughout the document</p>
3.2.5	<u>Improving nutrition and health of farm and food system workers</u>	<p><u>Comment:</u> subsection should be moved within 3.2.2</p> <p><u>Comment:</u> include new paragraph about strengthening/promoting National Rural Development policies with an integrated territorial approach.</p>
3.2.5	a) States and private sector actors should ensure that those who grow the world's food, have sufficient livelihoods to ensure they too can access healthy diets for their own optimal nutritional status. This means ensuring food producers and workers are food secure, have decent wages, and can access health services.	a) States and private sector actors should ensure that those who grow the world's food, have sufficient livelihoods to ensure they too can access healthy diets for their own optimal nutritional status. This means ensuring food producers and workers are food secure, have decent wages, and can access health services. <b>"One Health Approaches" need to be promoted (human, animal, ecosystem).</b>
3.2.5	b) States should ensure that right to decent work are respected, protected and fulfilled, that farmers and other food producers and workers are protected and safe, and there is no unnecessary burden or undue labour which could negatively impact their health.	b) States should ensure that right to decent work are respected, protected and fulfilled, that farmers and other food producers and workers are protected and safe, and <b>that</b> there is no unnecessary burden or undue labour <b>(including modern slavery)</b> which could negatively impact their health.
3.2.6	<u>Prioritizing climate adaptation and mitigation</u>	<p><u>Comment:</u> add para on Agroecology or Organic agriculture. States should promote Agroecology and other innovative approaches [and sustainable agriculture more generally] in line with the HLPE 2019 Report on Agroecological and other innovative approaches.</p> <p><u>Comment:</u> Need to further highlight the fundamental importance of preserving biodiversity in a context of climate change and natural</p>

		depletion. Tools to achieve this should be listed as examples. More emphasis should be placed on climate change mitigation.
3.2.6	a) States should support and assist farmers and other food producers to lower the environmental impact of food systems. This could be done by fostering appropriate technology and changes in management to improve crop yields and reduce non-organic fertilizer and pesticide usage. States could promote optimization of agricultural outputs per unit of water, energy, and land, and manage the carbon footprint of agriculture activities.	a) States should support and assist farmers and other food producers to <b>adapt to changing environments and to lower the environmental impact of food systems, including in reducing GHG emissions</b> . This could be done by fostering appropriate technology and <b>farming practices as well as</b> changes in management to improve crop yields and reduce <b>and risk assess</b> non-organic fertilizer and pesticide usage. States could promote optimization of agricultural outputs per unit of water, energy, and land, and manage the carbon footprint of agriculture activities.
3.2.6	b) Development partners and Non-Governmental Organizations (NGOs) should provide technical assistance to farmers and other food producers to help them adapt to, and ensure food supply chains are resilient to, climatic shocks and humanitarian crises. Interventions could include access to finance, insurance, better forecasting data, and productive-asset creation initiatives (e.g. rehabilitating degraded land and infrastructure building).	b) <b>States, Development partners and Non-Governmental Organizations (NGOs) should provide technical assistance to farmers and other food producers to help them adapt to, and ensure food supply chains and the food supply chain actors, to help them adapt to climate change, and ensure food systems</b> are resilient to, climatic shocks <del>and humanitarian crises</del> . Interventions could include access to finance, insurance, better forecasting data, <b>immediate help through service apps (i. e. for the identification of plant diseases and parasites)</b> and productive-asset creation initiatives (e.g. rehabilitating degraded land and infrastructure building).  <u>Comment:</u> reference to humanitarian crises: better if placed in dedicated section below.  <u>Comment:</u> b) This paragraph only proposes Development partners and NGOs to provide assistance. However, the national extension systems should be kept at the forefront of these interventions.
3.2.6	c) States should assist farmers and other food producers to protect crops and livestock and their production systems from the anticipated impacts of climate change in the form of pests, diseases, weather-related shocks, extreme price volatility through cover crops, no-till farming, crop and weather insurance, and renewable energy technologies.	c) States should assist farmers and other food producers to protect crops, livestock and <b>fisheries and</b> their production systems from the anticipated impacts of climate change in the form of pests, diseases, weather-related shocks, extreme price volatility through, <b>for example</b> , cover crops, no-till farming, crop and weather insurance, and renewable energy technologies.  <u>Comment:</u> c) The state <i>can</i> do this, but doesn't have to. The tools listed here – e. g. risk insurance against weather events - are most commonly

		<p>provided by the economy. The state should only intervene when adequate tools for addressing vital issues are otherwise not available in a given country.</p> <p><u>Comment:</u> c) Utilization of <b>renewable energy</b> sources and their share in the food chain should be increased and thus supported by all states.</p>
3.2.6	<p>d) States should support investment in diverse and nutritious crops and animal production systems, enhanced storage and marketing, reduced food loss and resilience-focused adaptations. Donors and investors should diversify agricultural investment based on ecological suitability, such that a greater diversity of production systems are supported, varied and at scale to meet the needs of both large and small farmers.</p>	<p>d) States <b>and the private sector</b> should support <b>and encourage</b> investment in diverse and nutritious crops and animal production systems <b>including fisheries and aquaculture</b>, enhanced storage and marketing, reduced food loss <b>and waste</b> and resilience-focused adaptations. Donors and investors should diversify agricultural investment based on ecological suitability, such that a greater diversity of production systems are supported, varied and at scale to meet the needs of both large and small farmers.</p> <p><u>Comment:</u> d) The economy rather than the state is responsible for investing in crops and animal production systems.</p>
3.2.6	<p>e) States should include dietary quality indices and other food system metrics as part of climate-related target-setting agendas and in related surveillance systems (including early warning systems) to monitor changing conditions and the effectiveness of policy responses.</p>	<p>e) Add "[...] quality indices (<b>integrating diversification and biodiversity targets</b>) and other food system metrics [...]"</p>
3.2.6	<p>f) Researchers should promote the generation and use of rigorous evidence on investment along food supply chains that are resilient to climate change while also delivering positive dietary outcomes. Research should focus on potential interventions and policy entry points to ensure agricultural production, processing and packaging, retail and markets, and consumer demand are adaptable to climate change and disruption.</p>	<p>f) Researchers should promote the generation and use of rigorous evidence on <b>responsible</b> investment along food supply chains that <b>and that mitigate and</b> are <b>more</b> resilient to climate change while also delivering positive dietary outcomes. Research should focus on potential interventions and policy entry points to ensure agricultural production, processing and packaging, retail and markets, and consumer demand <del>are</del> <b>adaptable contribute to mitigation and adaptation</b> to climate change and disruption.</p> <p><u>Comment:</u> f) Add reference to obtaining increased, context-specific and scientific evidence [research] on the ability of agroecology and organic farming to contribute to climate change adaptation and mitigation.</p> <p><u>Comment:</u> f) Welcome the idea of extending VGs to the retail sector as</p>

		well
3.2.7	<u>Empowering youth in food systems</u>	
3.2.7	b) States and private sector food actors should provide appropriate training, education, and mentorship programmes for youth to increase their capacity and access to decent work and entrepreneurship opportunities to stimulate their contribution to reshaping food systems.	b) States and private sector food actors should provide appropriate training, education, and mentorship programmes for youth to increase their capacity and access to decent work and entrepreneurship opportunities to stimulate <b>to the transition towards sustainable healthy food systems</b> <del>their contribution to reshaping food systems.</del> "
3.2.7	c) States and private sector food actors should promote development and access to innovation and new technologies along food supply chains that enhance nutrition, especially to attract and enable youth to be drivers of improvement in food systems.	c) Add "[...] should promote development and access to <b>sustainable</b> innovation and new technologies [...]"
3.2.8	<u>Supporting food safety across food supply chains</u>	<p><u>Comment:</u> Further develop the food safety aspects of the document. (see also 3.2.3, 3.2.4, 3.2.6, 3.3, 3.4, 3.5, 3.6).</p> <p>Add new <b>point c) One Health Approach: Human, animal, ecosystems.</b> (other points consequently re-numbered)</p> <p><u>Comment:</u> It is of utmost importance to put in place adequate food safety frameworks so as to : ensure sanitary risk assessment, through independent agency, and based on a broad and collective evidence expertise ; ensure traceability all along the food chains ; reinforce sanitary monitoring actions in order to be able to detect sanitary dangers and take actions.</p> <p>In this context, we would like to include in the text the need of regular update of sanitary measures according to new results of research, as well as the need to encourage further research works on emerging issues such as endocrine disruptors, cocktail effect and neo-formed contaminant for example. Moreover, where appropriate, precautionary approach could be relevant to protect consumers.</p>
3.2.8	a) States should prioritize food safety within their food systems and consider actions concerning handling, preparation, storage, and distribution of food in ways that prevent food-borne illnesses, transmission or contamination of naturally occurring toxins, pesticides, antibiotics and heavy metals. Investment should be made to train food handlers and adopt scientific, risk-based practices that can provide safe food while retaining their nutritional value.	: a) Add "[...] food-borne illnesses <b>and antimicrobial resistance</b> , transmission or contamination [...] their nutritional value. <b>States should develop, in parallel, a prospective approach to anticipate emerging sanitary issues such as endocrine disruptors, nanomaterials, neo-formed contaminants, cocktail effect, so as to regularly update food control systems.</b> "

3.2.8	b) States should develop, establish, enforce and strengthen, as appropriate, food control systems, including reviewing and modernizing national food safety legislation and regulations to ensure that food producers and suppliers throughout the food chain operate responsibly. Considering the centrality of the <i>Codex Alimentarius Commission</i> on nutrition and food safety, States should implement, as appropriate, internationally adopted standards at the national level.	b) Add/Delete: "[...]Considering the centrality of the <i>Codex Alimentarius Commission</i> on nutrition and food safety <b>and quality</b> , States should implement, as appropriate, internationally adopted standards at the national level <b>use Codex and OIE standards as international references to develop their national regulations.</b> "
3.2.8	c) States should participate in, and contribute to, international networks to exchange food safety information, including the management of emergencies to improve the safety of food across a range of issues such as pesticide residues, antimicrobial residues, endocrine disrupters, chemical and unsafe food additives, pathogenic bacteria, viruses, and parasites.	<u>Comment:</u> explicitly refer to the role of INFOSAN, the International Food Safety Authorities Network, managed jointly by FAO and WHO
3.2.8	d) To address global antimicrobial resistance (AMR), States should develop and implement national guidelines on the prudent use of antimicrobials in food-producing animals according to internationally recognized standards adopted by competent international organizations. This is to reduce the non-therapeutic use of antimicrobials and to phase out the use of antimicrobials as growth promoters in the absence of risk analysis as described in the <i>Codex Code of Practice CAC/RCP61-2005</i> .	d) To address global antimicrobial resistance (AMR), States should develop and implement national guidelines on the prudent use of antimicrobials in food-producing animals <b>and plants</b> according to internationally recognized standards adopted by competent international organizations. This is to reduce the non-therapeutic use of antimicrobials and to phase out the use of antimicrobials as growth promoters <del>in the absence of risk analysis as described in the <i>Codex Code of Practice CAC/RCP61-2005</i>.</del>
3.2.8		Add <b>new subpara e) "States should encourage research work and regular assessment on emerging sanitary risks related for example to cumulative effect (cocktail effect) and neo-formed contaminants. Regulations should be regularly updated according to research findings in those domains."</b>  <u>Comment:</u> Add new subsection <b>3.2.9</b> on the last part of the food chain: <b>consumers.</b>
<b>3.3</b>	EQUITABLE ACCESS TO SUSTAINABLE AND HEALTHY DIETS	<u>Comment:</u> on all Section 3.3 – <b>Potential policy measures and (financial) mechanisms should be analysed carefully and need to undergo in-depth assessment.</b>  <u>Comment:</u> This section should envisage a greater role for the private sector.

		<u>Comment</u> : see comment to PART 1 point 7.
<b>3.3</b>	40. Policies and programmes aimed at improving food environments to ensure healthy diets are available, accessible, affordable, culturally acceptable, and safe, should be prioritized by States in the interest of their citizens. For many people, physical access to nutritious food can be problematic as it may not be available in local markets or the markets. Nutritious food can also be unaffordable, particularly food that is perishable or comes from a longer distance.	40. Policies and programmes aimed at improving food environments to ensure <b>sustainable</b> healthy diets are available, accessible, affordable, culturally acceptable, and safe, should be prioritized by States in the interest of their citizens. For many people, physical access to nutritious food can be problematic as it may not be available in local markets or the markets. Nutritious can also be unaffordable, particularly food that is perishable or comes from a longer distance.
3.3.1	<u>Improving physical access to nutritious food</u>	<u>Comment</u> : This subsection seems to be mostly focussed on middle- and high-income countries
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.	b) Add "[...] mobile food retailers that sell nutritious <b>and sustainably produced</b> food in low income areas,[..]"
3.3.1	c) States should take into consideration an equity lens when examining access to food environments and ensure members of historically marginalized and vulnerable communities, residents of low-income communities, indigenous people, and those living in rural areas have sufficient access to diversified food markets.	c) Add "[...] indigenous people, <b>people facing physical constraints due to age, illness or disability</b> , and those living in [..]"
3.3.2	<u>Improving the availability of nutritious food</u>	Although the <b>free school meals</b> can be difficult to implement in some low-income countries, it should be the direction all states aim at.
3.3.2	a) States should promote the provision of nutritious food through local farmers markets, community cooperatives and other community building efforts that engage citizens around local food culture.	a) include concept of " <b>short marketing channels</b> "
3.3.2	b) States should encourage small and medium enterprises to competitively participate in wet markets, local, domestic and informal markets, and incentivize street vendors to improve the health composition of prepared food through financial incentives and certifications.	b) States should encourage small and medium enterprises to competitively participate in wet markets, local, domestic and informal markets, and incentivize street vendors to improve the <b>safety and the health</b> composition of prepared food through financial incentives, <b>training</b> , and certifications.
3.3.2	c) States should strengthen public procurement systems by ensuring nutritious food is more accessible and convenient in institutions such as schools, hospitals, foodbanks, and prisons. States should consider promoting home grown school meals, where food served in schools is procured from local and/or family farmers, which can have multiple	c) States should strengthen public procurement systems by ensuring nutritious, <b>diversified, balanced and</b> food is more accessible and convenient in institutions such as schools, hospitals, foodbanks, and prisons <b>by setting official standards</b> . States should consider promoting home grown school meals, where food served in schools is procured

	<p>food system benefits by establishing stable markets for producers while serving more recommended, healthy diets to children.</p>	<p>from local and/or family farmers, which can have multiple food system benefits by establishing stable markets for producers while serving more recommended <b>sustainable and</b> healthy diets to children <b>and protecting the environment.</b> [Furthermore,] <b>Ensuring that food is tasty and acceptable to cultural preferences is key..</b></p> <p><u>Comment:</u> Please include an explicit reference to the development of standards for public catering: e.g. by setting official standards (the <i>World Coalition on Healthy School Meals</i> addresses this).</p>
3.3.3	<p><b>Making nutritious food more affordable</b></p>	<p><i>Message to CFS: paragraph is under internal discussion within the EU and its Member States. Further comments will be provided at a later stage in the negotiations.</i></p>
3.3.3	<p>a) States should consider pricing policies 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.</p>	<p><i>Message to CFS: paragraph is under internal discussion within the EU and its Member States. Further comments will be provided at a later stage in the negotiations.</i></p>
3.3.3	<p>b) States can be instrumental in reducing the prices of nutritious food by helping farmers reduce their production costs. This can be accomplished through grants, subsidies and non-financial support services to reduce inefficiencies and promote value of nutritious food in the supply chain.</p>	<p>b) Add/Delete "States can be instrumental in <del>reducing the prices of</del> <b>improving access to diversified and</b> nutritious food by helping farmers reduce their production costs <b>and engage in transition towards more sustainability.</b> [...] to reduce inefficiencies and promote value of <b>diverse and</b> nutritious food in the supply chain."</p> <p><u>Comment:</u> b) [regarding first sentence of para] This is true. But by applying the true cost accounting principle, it would turn out that „cheap“ junk food has a much higher cost, and nutritious, healthy food (due to its health benefits) would be competitive.</p>
3.3.3	<p>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 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 can also be used for health promotion strategies including</p>	<p><i>Message to CFS: paragraph is under internal discussion within the EU and its Member States. Further comments will be provided at a later stage in the negotiations.</i></p>

	retail, manufacturing, or agricultural incentives to reduce the price of nutritious food.	
3.3.4	<u>Monitoring new technologies and trends for healthy diets</u>	<p>TITLE – add: “Monitoring new technologies and <b>promoting</b> trends for <b>sustainable</b> healthy diets”</p> <p><u>Comment:</u> Add a line on how new technologies can be used in humanitarian contexts, for instance “States and non-governmental actors should use new technologies to improve supply planning for Ready To Use Supplementary and Therapeutic Food at country and regional levels.”</p> <p><u>Comment:</u> Where possible, "healthy diet" should be replaced with "<b>sustainable healthy diet</b>" in order to link the concept with FAO/WHO, 2019.</p>
3.3.4	a) States and researchers should understand the influential roles of the internet, social media and online shopping on the access to healthy diets, addressing the digital divide among different demographics through the use of portable tools to minimize disparities in access to food.	a) Add "[...] should understand <b>and acknowledge</b> "
3.3.4	b) States and private sector food actors should ensure that with the emerging trend of increased consumption of food consumed away from home, restaurants are incentivized to promote nutritious food options, display information about food on menus (i.e. calories, and other nutritional content), and adhere to food safety regulations.	b) States and private sector food actors should ensure that with the emerging trend of increased consumption of food consumed away from home, restaurants are incentivized to promote nutritious food options, <b>avoid food waste</b> , display information about food on menus (i.e. <b>diversified and balanced dietary options</b> , calories, and other nutritional content), and adhere to food safety regulations.
3.3.4	c) With regard to environmental sustainability, States should understand, scrutinize and govern new food technologies (e.g. lab grown meats, gene editing, biofortified crops, etc.) through CODEX standards as any new food product does in international regulatory frameworks.	<p>c) <del>With regard to environmental sustainability,*</del> States should <b>promote environment-friendly, diversified food production and consumption to preserve biodiversity and soil fertility. States should</b> understand, scrutinize <b>against sustainability criteria</b> and govern new food technologies (e.g. lab grown meats, gene editing, <del>biofortified crops</del>, etc.) <del>through CODEX standards*</del> as any new food product does in international regulatory frameworks.</p> <p><u>*Comment:</u> These issues relate to health and safety <i>as well as</i> environmental sustainability.</p>

		<p><u>*Comment:</u> c) (No CODEX standards on these subjects).</p> <p><u>Comment:</u> We agree that states should assess the environmental sustainability of new technologies. However, we would like to stress that this aspect is currently not within the scope of Codex. We propose to clarify, e.g., as follows: With regard to environmental sustainability, States should understand, scrutinize and govern new food technologies (e.g. lab grown meats, gene editing, biofortified crops, etc.). Through Codex they should assess the safety of foods resulting from new technologies (as with any new food product in international regulatory frameworks), by prioritizing and addressing emerging issues that are critical to the sustainability of food systems in a timely manner.</p>
3.4	PEOPLE-CENTERED NUTRITION KNOWLEDGE, EDUCATION AND INFORMATION	<u>Comment:</u> more relevance to be given to rural areas in all subparas.
3.4	41. People, both individuals (rights-holders) and members of institutions (duty-bearers), are at the centre of food systems, acting as drivers and experiencing outcomes. Access to knowledge, education and the quality of information available to people on nutritious food, healthy diets and nutrition should become a priority. This prioritization could be done by utilizing available and effective tools, key actors across food systems, and the places in which people access food in their daily lives. It is also important to consider the range and diversity of food cultures, social norms and traditions that influence healthy diets.	<p>41. People, <del>both individuals (rights holders) and members of institutions (duty bearers)*</del>, are at the centre of food systems, acting as drivers and experiencing outcomes. Access to knowledge, education and the quality of information available to people on nutritious food, <b>sustainable and</b> healthy diets and nutrition should become a priority. This prioritization could be done by utilizing available and effective tools, key actors across food systems, and the places in which people access food in their daily lives. It is also important to consider the range and diversity of food cultures, social norms and traditions that influence healthy diets <b>as well as better understand consumer behaviour through adequate research.</b></p> <p><u>*Comment:</u> 41. The language is unclear and does not provide any added values. Furthermore, States (institutions) also have rights, and individuals can have duties.</p> <p>Please clearly address responsibilities in this paragraph.</p>
3.4.1	<u>Putting people at the centre of nutrition knowledge, education and information</u>	<u>Comment:</u> Add something along the lines of: “States should ensure this knowledge is present also with experts working in all sectors that can impact on nutritional outcomes, including water, sanitation, education, health care.”
3.4.1	a) States should pay particular attention to dietary and nutritional	a) Add “[...] ensure food systems are delivering <b>sustainable</b> healthy diets

	needs across the entire lifecycle including pregnant and lactating women, women of reproductive age and adolescent girls, infants, children under five, people living with HIV and tuberculosis, the elderly and people with disabilities. States should ensure food systems are delivering healthy diets for these populations and mitigating against all forms of malnutrition.	[...]"
3.4.1	b) States should use the best scientific evidence to promote education and knowledge of healthy diets, physical activity, food waste and safety, adequate breastfeeding and complementary feeding, taking into consideration cultural and social norms and adapting to different audiences and contexts.	b) Add "[...] and knowledge of <b>sustainable</b> healthy diets, physical activity, food waste <b>prevention</b> and <b>food</b> safety, [...]"
3.4.1	e) Private sector actors should increase the acceptability of nutritious food by producing and marketing packaged food of this kind in a way that is convenient for people to prepare, cook and eat.	<u>Comment:</u> e) Add that the private sector should provide better information on the nutritional content of products, e. g. through labelling. (Reference to the Codex Alimentarius Committee on food Labelling?)
3.4.2	<b>Utilizing policies and tools to increase knowledge, education and information</b>	<i>Message to CFS: paragraph is under internal discussion within the EU and its Member States. Further comments will be provided at a later stage in the negotiations.</i>
3.4.2	a) States should develop national food-based dietary guidelines that define context-specific, sustainable and healthy diets by taking into account social, cultural, economic, ecological and environmental drivers.	a) States should develop national food-based dietary guidelines that define context-specific, sustainable, <b>diverse</b> and healthy diets by taking into account social, cultural, economic, ecological and environmental drivers.
3.4.2	b) States should develop nutrition standards and regulations for the marketing of food and beverages to children and ban advertising of less nutritious food to children, as they are particularly susceptible to the influence of food marketing.	b) Add/Delete: "[...] beverages to children and <del>ban</del> <b>regulate</b> advertising of less nutritious food to children, [...]"
3.4.2	<b>c) States should institute easy-to-read front-of-pack labelling of evidence informed metrics/warnings such as overall fat quality (e.g. unsaturated to saturated fat ratio), trans-fats, carbohydrate quality (e.g., carbohydrate to fiber ratio), added sugars, and sodium. Food with warning signs should be regulated – i.e. not sold in or near schools and not advertised to children.</b>	<i>Message to CFS: paragraph is under internal discussion within the EU and its Member States. Further comments will be provided at a later stage in the negotiations.</i>
3.4.2	k) States should draw on the knowledge, experience and insights of individuals who are not usually regarded as members of the nutrition community - e.g. community leaders, chefs, supermarket buyers,	k) Add "[...] and the benefits of <b>sustainable</b> healthy diets."  <u>Comment:</u> k) Mention effectiveness of focused mass media campaigns

	influencers on social media, youth leaders, young entrepreneurs, mayors and local communities - in the development of multi-component, community-based media campaigns promoting nutrition education and the benefits of healthy diets.	promoting healthy diets.
3.4.3	Promoting “hubs” for nutrition knowledge, education and information	<u>Comment</u> : Add greater reference to the role of the food environment.
3.4.3	a) Universities and schools should institute a nutrition curriculum for all medical and nursing students during training.	a) Add/Delete: "Universities and schools should institute a nutrition curriculum for all medical <del>and</del> , nursing <b>and agriculture</b> students during training."  <u>Comment</u> : a) Knowledge on nutrition should also be provided to agricultural schools, <b>food technology students and food technology courses</b> not just for medical and nursing students.
3.4.3	b) States should support school and worksites to serve nutritious 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 healthier diets and the need to reduce food waste.	b) Add “[...] the consumption of <b>more sustainable</b> , healthier diets and the need to reduce food waste.”
3.5	GENDER EQUITY AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS	<u>Comment</u> : We propose to add somewhere, possibly under 3.5.1 <u>Recognizing women’s nutritional status and deprivation</u> that also “adolescent boys can be vulnerable to undernutrition, in particular in settings where they have lost access to familiar foods and their support network”. This could also go under the heading of humanitarian contexts under 3.6.2 <u>Protecting nutritionally vulnerable groups</u> .
3.5	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.	42. Gender relationships and norms are among the most significant drivers of healthy diets. In many countries, women <b>produce the food</b> , 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. <b>In general, women have the main responsibility for family nutrition. However, the involvement of men in understanding</b>

		the importance of nutrition for all family members and the related processes in the food systems is crucial. With increased understanding and joint decision-making, access to resources for a healthy diet will be improved.
3.5.1	<u>Recognizing women’s nutritional status and deprivation</u>	
3.5.1	b) Acknowledging the significant time and work burden of women in the preparation of nutritious food at the household level, and their roles in agriculture and food production, States should recognize and value the importance of unpaid care work at household level through protective laws, social protection programmes and other benefits.	b) Add at the end: <b>“The equal participation of men in unpaid work should be promoted, especially where women are also active in productive labour [both through social protection and benefits for men as care givers].”</b>
3.5.2	<u>Promoting and acknowledging women as food system entrepreneurs</u>	
3.5.2	a) States should advance women’s equal tenure rights, and their equal access to and control over productive land, natural resources, inputs, productive tools, and promoting access to education, training, markets, and information in line with the <i>VGGT</i> . This can be done by strengthening women’s access to natural, physical, financial, human, and social capital, so they can effectively contribute to sustainable food systems that promote nutrition.	<u>Comment</u> : include reference to VGGT.
3.5.3	<u>Empowering women across food systems</u>	<u>Comment</u> : Add subparagraph on <b>women's education and training</b> (e. g. following Decade of Family Farming and its Global Action Plan)  <u>Comment</u> : we strongly recommend including more reference to violence against women. We suggest including some text similar to the one that appears in the Decade of Family Farming draft: <i>“Women farmers are particularly vulnerable to violence, due to their relatively weaker social position and lack of awareness regarding their rights. Promoting a favorable context to generate cultural changes towards gender equality with specific policies, programmes, institutions and advocacy campaigns is key to deal with the various forms of discrimination and violence they face”</i> .
3.5.3	a) States should enhance women’s meaningful participation in partnerships, decision-making, leadership roles, and the equitable sharing of benefits. A priority should be to strengthen rural women’s participation and representation at all levels of policymaking for food security and nutrition, to ensure their perspectives are equally taken	

	<p>into account.</p> <p>b) States should increase women’s human capital by ensuring that women and girls have access to education and literacy, health care services and social services, as a way to increase household nutritional status.</p> <p>c) States should enshrine laws that give women and men shared participation in political decision-making and equality, supporting women holding leadership roles in decision making bodies – parliaments, ministries and local authorities at district and community levels – so that they can be part of the process of devising solutions to the malnutrition challenges they face.</p>	
3.6	FOOD SYSTEMS AND NUTRITION IN HUMANITARIAN CONTEXTS	<p><u>Comment:</u> We know that a one-fits-all approach doesn’t work and would propose to include a diagnostic method/guidance to help prioritize action.</p> <p>The body of the guidelines focuses on diets and food systems, which is evidently beyond the nutrition sector. Anyhow, we suggest to mention: 1) the importance of adequate and accessible complementary food products at country level (as important as promotion and protection of breastfeeding), and 2) the use of existing tools (i.e. nutrients gaps analysis) to identify the biggest gaps and guide food production promotion/behavioral change communication campaigns.</p>
3.6	43. This part builds upon the 11 principles in the FFA. In situations of humanitarian crises, there is a critical need for nutrition interventions that link humanitarian responses with 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 so that it does not worsen. For those who are already dealing with a malnutrition, emergencies can be a tipping point which can exacerbate malnutrition issues.	<p>43. Add: "[...] In situations of humanitarian crises, there is a critical need <b>to provide food assistance to affected population as well as nutrition interventions</b> that link humanitarian responses [...]"</p> <p><u>Comment:</u> Add footnote with FFA reference.</p>
3.6.1	<u>Improving the nutritional quality of food and nutrition assistance</u>	<p><u>Comment:</u> Despite the focus on food systems, we miss a link to interventions in the health sector. Nutritional problems in humanitarian contexts are usually multi-sectoral and need interventions of a medical nature.</p>
3.6.1	b) States, parties involved in conflict and natural disasters and humanitarian organizations should provide timely, safe, and sufficient	b) Add "[...] traditions, dietary habits <b>and needs</b> , and preferences of [...]"

	assistance in response to humanitarian crises in a flexible manner, conforming with the beliefs, culture, traditions, dietary habits and preferences of individuals, in coordination with all stakeholders. The assistance should promote survival, uphold dignity and build resilience.	
3.6.1	c) States should ensure the basic nutritional needs of those people affected by a humanitarian crisis, including the most nutritionally vulnerable. The food items provided should be of appropriate quality, acceptable, and can be used efficiently and effectively. Food must conform to the food standards of the host country's government as well as to the Codex Alimentarius standards about quality, packaging, labelling and fitness for purpose.	c) Add/Delete "[...] food standards of the host country's government <del>as well as to</del> <b>in line with</b> the Codex Alimentarius standards [...]"
3.6.1	d) States and humanitarian assistance organizations should be encouraged to purchase locally produced micronutrient-fortified foods in their programs (instead of importing these foods).	<u>Comment</u> : States and humanitarian assistance organizations should be encouraged to purchase locally produced micronutrient-fortified foods in their programs (instead of importing these foods).
3.6.2	<u>Protecting nutritionally vulnerable groups</u>	
3.6.2	a) States and humanitarian organizations should pay particular attention, protection, and facilitate access to nutritious food and nutritional support to pregnant and lactating women, women of reproductive age and adolescent girls, infants, children under five, people living with HIV and tuberculosis, the elderly and people with disabilities.	<u>Comment</u> : a) Please add IDPs to the list of vulnerable groups.
3.6.3	<u>Making food systems resilient</u>	<u>Comment</u> : Add a reference to insurance and other risk pooling systems, a promising avenue to promote resilience.
3.6.3	b) States should invest in disaster risk reduction measures that benefit those most at risk or most in need. In particular, productive assets should be protected from severe weather and climate impacts in a way that strengthen the resilience of affected populations and their ability to cope with shocks from conflicts, climate change or natural disasters. Measures include social safety nets, investment in protecting fragile livelihoods, emergency fiscal and food reserves, the reduction of transaction costs, and the identification of platforms for integrated interventions.	b) Replace "emergency fiscal and food reserves" with "emergency <b>financial</b> and food reserves"
	<b>PART 4 – IMPLEMENTATION AND MONITORING OF THE USE AND APPLICATION OF THE VGFSyN</b>	<u>Comment</u> : Regretfully the important aspect of domestic budgetary allocations is a bit watered down in PART 4. We suggest to include a more

		<p>explicit reference to 'budgetary' resources. One of the major challenges we face in this respect here, for instance, is the difficulty in tracking these resources (not only budgets but also expenditure), and I would assume in many countries this is a difficulty if they don't have a solid budget classification system. We therefore suggest that a reference to the importance of tracking planning, budgeting and actual expenditure on Food Systems and Nutrition.</p> <p><u>Comment:</u> The Decade of Family Farming and its Global Action Plan (2019-2028), and the CFS Framework for Action for food security and nutrition in protracted crises – FFA (2015), are missing and we recommend to add paragraphs to link them with the implementation of the VGFSyN.</p> <p><u>Comment:</u> suggest adding, a new paragraph on publicity in order to encourage States, and all stakeholders involved, to promote and disseminate VGFSyN. It would be extremely important to collaborate with the private sector, traditional actors and consumer or farmer associations.</p> <p><u>Comment:</u> suggest strengthening the role of the CFS in monitoring the progress of the implementation of these Guidelines (such as reflected in the Voluntary Guidelines on the Responsible Land Tenure).</p>
	<p>44. All CFS stakeholders are encouraged to promote at all levels within their constituencies, and in collaboration with other relevant initiatives and platforms, the dissemination, use and application of the VGFSyN to support the development and implementation of national policies, programmes and investment plans across all sectors. States are invited to promote the use and implementation of the VGFSyN through coordinated and multi-sectoral policies and interventions, ensuring that activities of different ministries converge toward the promotion of sustainable food systems that enable sustainable and healthy diets and improve nutrition.</p>	<p>44. Add "[...] support the development and implementation of national <b>and local</b> policies, [...]"</p>
	<p>47. Development partners, specialized agencies of the UN, and regional organizations are encouraged to support voluntary efforts by States to implement the VGFSyN. Such support could include</p>	<p><u>Comment:</u> 47. The CFS guidelines are designed as a political signal. Their implementation should take place on a voluntary basis. However, in PART 4 it is largely unclear who should implement / monitor which measure</p>

	<p>technical cooperation, financial assistance, the provision of evidence-based policy advice, institutional capacity development, knowledge sharing and exchange of experiences, and assistance in developing national policies.</p>	<p>and how (personnel, financial resources, see in particular section 47 "technical cooperation, financial assistance")?</p> <p><u>Comment:</u> 47. It should be ensured that all stakeholders (including the private sector and civil society) participate in any such burden-sharing. (How should this be done?)</p>
	<p>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 agriculture and food sector investment plans.</p>	<p>48. Delete "[...] to support both right holders and duty bearers' endeavours."</p>
	<p>51. Multistakeholder platforms, partnerships and frameworks at 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 for improved nutrition. Particular attention should be paid to those partnerships and platforms that are already promoting multistakeholder efforts for improved nutrition at country level, such as the Scaling Up Nutrition (SUN) Movement. 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. Moreover, actions and synergies should be implemented through the United Nations Standing Committee on Nutrition (UNSCN) which is responsible for promoting policy coherence and advocacy for nutrition throughout the UN system.</p>	<p>51. Add/Delete "[...], and across multiple sectors, <del>have to</del> <b>should</b> be established or strengthened [...]"</p>
	<p>54. The dissemination and uptake of the VGFSyN should be facilitated through the identification of "champions" that could raise awareness across sectors, and the organization of advocacy campaigns at different levels. CFS provides a forum where all relevant stakeholders can learn from the experiences of others in applying the VGFSyN and assess their continued relevance, effectiveness and impact on food security and nutrition.</p>	<p>54. The dissemination and uptake of the VGFSyN should be facilitated through the identification of "champions" <b>and "change agents"</b> that could raise awareness across sectors, and the organization of advocacy campaigns at different levels. CFS provides a forum where all relevant stakeholders can learn from the experiences of others in applying the VGFSyN and assess their continued relevance, effectiveness and impact on food security and nutrition <b>within environmental limits.</b></p>

