

## New Zealand comments on Draft One of the CFS Voluntary Guidelines on Food Systems and Nutrition

### General comments

- We recommend the inclusion of an overarching comment around the importance of ensuring that any intervention is informed by country-specific data and social science, in order to best enable the desired outcome for the population.
- References should be provided when recommending specific interventions, as well as when making statements about the way food systems work, drivers and impacts (causation and correlation) and whether a given issue or relationship is perceived to be positive or negative. This ensures the evidence-base for recommendations are transparent, and observations about food system dynamics and issues are well supported by facts and examples.
- The nutrition aspects of the guidelines are very well canvassed, but the document is much lighter on the environmental side. There is little substantive content that considers how the draft principles and recommendations impact or are impacted by environmental factors. Social and economic aspects are also generally considered, but there is particular scope for environmental dimensions (context and consequences) to be further elaborated.
- In general, the paper is lacking on content about how trade can help address food and nutrition security, and references to the use of fiscal policy to improve world food security and nutrition outcomes are at times misinformed/unhelpful. The guidelines are currently not coherent from a fiscal/trade policy perspective and the fact that they try to offer guidance in that area is potentially detrimental.
- There is a lot of scope to add detail at a local level, which is important for generic global guidelines to have impact.

### Detailed comments

Page	Paragraph	Comments
1	1	The paragraph suggests that malnutrition represents a major impediment to achieving global food security. We'd suggest that malnutrition is a <u>result</u> of global food insecurity, rather than an impediment. Impediments include conflict, social and economic inequality, infrastructure issues, access to land/land tenure, misinformation, lack of reproductive rights etc. We further suggest, for clarity, rewording the current text to say the following: "Malnutrition in all its forms has become one of the major global challenges that countries face today. The term malnutrition includes three broad groups of conditions 1. undernutrition, 2. micronutrient deficiencies and 3. overweight, obesity and diet related noncommunicable diseases." Reference: <a href="https://www.who.int/news-room/fact-sheets/detail/malnutrition">https://www.who.int/news-room/fact-sheets/detail/malnutrition</a> >
2	6	We suggest that reference to accessing a "safe diet" is an odd phrase, and perhaps inaccurate. We suggest changing sentence 2 of paragraph 6 to "...access to healthy and safe <b>food</b> ..."
2	6-7	While low socio-economic status may often correlate with undernutrition, this does not necessarily hold true for "malnutrition in all its forms" as the paragraph suggests, for example in developing countries overnutrition, overweight and obesity often correlate with higher socio-economic status.

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		Likewise the 1 <sup>st</sup> sentence of paragraph 7, beginning “poverty and inequality are important underlying causes of hunger and malnutrition in all its forms” is an oversimplification. Again the statement does not necessarily hold true for overweight/obesity and associated non-communicable diseases, which in some contexts are considered diseases of affluence.
2	7	This paragraph is confusing. It is unclear whether the key message is that economic slowdowns and downturns are what “...limits the capacity of national governments to ensure provision of essential social services and delivery of health care” and if so, how this relates to inequality, or conversely whether the paragraph is saying that the health impacts of malnutrition in all its forms means the amount of money available for delivery of all healthcare is reduced? It is not clear what factors are considered drivers and what are considered consequences, and which causal links are being drawn. We suggest the different issues introduced in this paragraph need to be untangled. Evidence to support the assertions would also be helpful.
3	8	<ul style="list-style-type: none"> <li>• Please add source/reference for this statement</li> <li>• Is it accurate to say these groups are most affected by all forms of malnutrition?</li> </ul> Suggest changing to say these groups are at particular risk of malnutrition or vulnerable as per wording on WHO website <a href="https://www.who.int/news-room/fact-sheets/detail/malnutrition">https://www.who.int/news-room/fact-sheets/detail/malnutrition</a>
3	10	Suggest broadening “agriculture” to refer also to food availability. The impacts that are referred to later in the paragraph are wider than agriculture and this should be reflected in the comment that “climate change, agriculture and nutrition are interconnected”. Also, as above, we suggest changing “availability of healthy diets” to “availability of healthy food.”
3	11	“Important determinants of shifts in consumer behaviour towards unhealthy diets” that are not identified here include media, advertising, large-scale dissemination of pseudo-science and industry-funded lobby and interest groups. Further, we question the validity of the link made here between enhanced interconnectedness of people and places with the overabundance of cheap, convenient and ultra-processed food and beverages without also highlighting that trade can be instrumental in helping improve access to nutritious food too. We think the conflation made here between globalisation etc. and unhealthy diets is an oversimplification and mischaracterisation and that the sentence should be deleted unless robust evidence to support the claim can be provided.
3	12	It’s important to be careful not to pin all negative environmental impacts onto “dietary trends”. Some of the earlier paragraphs highlights reasons for why malnutrition is occurring and many of these factors are also precursors to negative environmental impacts e.g. global deforestation is not primarily driven by dietary trends but by big business, corruption, poverty and inequality. Further, we do not think it is a given that all current food systems are characterised by “excessive consumption”. We are also not sure how this is defined/quantified here. Also, we assume that in the reference to the three dimensions of sustainability, ‘social’ includes cultural?

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3-4	13	<p>“Fostering policy, institutional and behavioural changes among food system actors is key”, which implies a government-led approach seems like quite an oversimplification (and overstatement of influence) in a global food system that is led by a few very large players.</p> <p>Again, as above, we suggest changing “...accessing sustainable and healthy diets” to “...accessing sustainable and healthy <b>food</b>”.</p>
4	14	<p>While we agree that a more integrated, holistic ‘food systems’ approach is needed to address policy fragmentation, we think this paragraph implies that solving malnutrition is solely the role of governments, and fails to acknowledge that in reality many of the drivers are largely outside government influence, or where governments do have influence it is indirect or minor compared to that of private sector actors.</p>
4	16	<p>The “variety of organisations from different sectors that are addressing malnutrition” listed here are almost all UN bodies. Where is big business/ industry in this list?</p>
5	20	<p>As above, focussing on the policy space alone seems out of touch with the reality of global food systems.</p>
8	30	<p>The last sentence of the sustainable and healthy diets definition refers to “avoiding unintended consequences” but it is not clear what is meant by this and from whose perspective. The definition overall does not acknowledge the tensions and trade-offs that are inherent in trying to “combine all dimensions of sustainability” and the challenges this poses for creating policies that attempt to optimally weigh up the many complex elements of “sustainable and healthy diets”. For example, nutrition and food security as a concept encompasses many aspects, including the four pillars of food security defined by the FAO, as well as the very complex world of micro-nutrient and macro-nutrient requirements that differs between demographic groups and across life stages. Similarly, the environmental dimension of sustainability encompasses many factors including, but not limited to, GHG emissions, biodiversity and ecosystem services, water use, water quality/eutrophication, land use, ecotoxicity and soil health. For such reasons, we suggest that the sustainable and healthy diets concept is an attractive and convenient amalgam that is nonetheless highly problematic in the way that it masks significant complexity and tensions.</p>
9	34 f)	<p>This principle seems somewhat vague and oversimplified. Also need to be very careful about drawing universal conclusions about nutrition that do not reflect individual needs, differences in food systems and their impacts, cultural aspects and other context-specific factors.</p>
9	34 g)	<p>“Realization of the Right to Adequate Food” seems an odd term and something of a woolly concept. We wonder if this principle could be made more meaningful and concrete.</p>
9	34 h)	<p>“...particularly among food system actors...” It is unclear what the “particularly” means, given the earlier definition of food systems includes everyone.</p>
9	35	<p>Suggest adding to the end of sentence 1 “...although which part/s of the system may be impacted and the scale of the impact may be unclear.”</p>
10	37	<p>Bullet 2 is only one determinant – the whole introduction section of the document discussed a whole suite of others (and we have here highlighted additional factors that the document does not identify)</p>

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		Bullet 4 – which people are central to nutrition knowledge and education? This statement appears either too vague or else entirely redundant.
10	38 3.1.1 b)	“States should facilitate an inclusive dialogue with the private sector to build strategies that improve food environments.” What does this mean?
10	38 3.1.1 c)	“...increased financial investment...” Such as? Public or private or both? In which bits of the system? How does this align with the acknowledgement in 3.1.1 para 38 b) above of the “pivotal role of the private sector” across the system?
11	38 3.1.2 b)	Suggest deleting “diets” and saying instead “...improving food security and nutritional outcomes...”
11	38 3.1.2 c)	Suggest climate change warrants a specific mention here.
11	38 3.1.3 b)	Suggest deleting the final sentence. This is a much wider issue and far more assessments would be required. We suggest it is unhelpful to single out competition and concentrated market power levels. We also think that the recommendation relating to what governments should do in terms of coverage in FTAs probably goes further than what NZ would be comfortable with.
12	39 3.2.1 a)	Soil health is broader than just soil fertility. Includes soil protection, reducing soil loss, compaction, carbon content...
12	39 3.2.1 c)	Suggest deleting “including agroecological approaches”. There is no clear justification for specifically including agroecology. It is one of many approaches to sustainable agriculture.
12	39 3.2.1 e)	We suggest that this needs to be weighted against comparative advantage/ economic development opportunities from exporting etc. Suggest that both some level of diversification and some level of economic development and therefore greater financial access to nutritious food together would promote the best outcomes.
12	39 3.2.2 a)	It is not clear what this recommendations looks like in practice but it reads as though states should dictate what people can and can’t grow on their land. Also appears to assume that what is grown domestically is consumed domestically. It is unclear how any of that translates to a country like New Zealand that exports ~90% of the food produced. Also could be incompatible with the ‘sustainable healthy diets concept’ as the recommendation to promote ‘nutrition-sensitive agriculture’ suggests/assumes that the most nutritionally-rich foods are also the most environmentally (and socially, culturally and economically?) sustainable. Many studies show that this is not necessarily the case.
12	39 3.2.2 b)	This recommendation seems naïve in the extreme. Consider all the commodities largely controlled by big multi-nationals that are often converted into highly-processed foods and alcohol and are associated with poor nutritional outcomes: sugar, palm oil, rice, corn, coffee, wheat, hops....
12	39 3.2.2 c)	We are not necessarily supportive of this recommendation, as propping up smallholders is not efficient from an economic perspective, may not result in the best environmental outcomes, does not guarantee improved nutrition and may not be the best allocation of government funds that could potentially be used (i.e. through technology development) to better achieve the goals of these guidelines.
12	39 3.2.2 d)	Suggest we need to be careful about highlighting one technology (positive or negative) in the same way we would caution against highlighting

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		agroecology as sole sustainable land management model.
13	39 3.2.2 a)	Suggest adding to the end of sentence 1 "...and also to minimise food waste."
13	39 3.2.3 c)	It is unclear here what "incentivize" means and what this recommendation would look like/ how it would be resourced in practice.
13	39 3.2.3 d)	Suggest there are fish hooks in the fortification/biofortification "processing technologies" referred to here that it would be helpful for the document to identify, including GM. Also suggest the recommendation to "promote longer-term storage of food" may need to be further unpacked. The rationale is understandable (though perhaps overlooks the role of trade), but also needs to consider that there are past examples of private and state run enterprises holding on to food in long term storage during periods of drought to ensure they command a higher price due to increased demand. The phrase "fortification through conventional on farm breeding" used here has been repeated several times. It would be useful to see evidence that fortification has occurred through conventional on farm breeding. Justification and process for the recommendation that "states should set guidelines and monitor the level of processing..." is not entirely clear. What sort of guidelines? How is this monitored and why? Which products? Suggest inserting "and unsustainable land management practices" to the statement "highly processed foods have associations with unhealthy diets..."
14	39 3.2.3 e)	We do not support specifying warning labels in this statement. Evidence suggests that other front-of pack- labelling formats are better understood by consumers and are more effective in helping consumers discriminate between products based on nutritional quality. <a href="https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6213801/pdf/nutrients-10-01542.pdf">https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6213801/pdf/nutrients-10-01542.pdf</a>
14	39 3.2.3 f)	Suggest the addition of saturated fat alongside trans-fats as per comment on page 17, paragraph 3.3.3 a. Suggest removing "fortificants" from the list. The addition of specific vitamins and minerals to food should only be encouraged where there is a demonstrated population public health need. Relevant references: WHO Global Action Plan: <a href="https://apps.who.int/iris/bitstream/handle/10665/94384/9789241506236_eng.pdf?sequence=1">https://apps.who.int/iris/bitstream/handle/10665/94384/9789241506236_eng.pdf?sequence=1</a>  WHO Guidelines on food fortification with micronutrients <a href="https://apps.who.int/iris/bitstream/handle/10665/43412/9241594012_eng.pdf?ua=1">https://apps.who.int/iris/bitstream/handle/10665/43412/9241594012_eng.pdf?ua=1</a>
14	39 3.2.4 a)	We are unclear how this approach would reduce food price volatility and also what value this would have in reducing malnutrition. We would point out that reducing/ eliminating subsidies to agricultural sectors does help reduce international price volatility. Given this is the specific focus here, we suggest adding a sentence: "In order to help reduce global food price volatility, states should reduce the volumes of trade-and-production-distorting subsidies provided to their agricultural sectors."
14	39	Noting that the food production part of the food system is only one source

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	3.2.6 a)	of GHG emissions and other environmental impacts and infrastructure, transport, pre and post-consumer waste, and storage also contribute considerable emissions and other impacts. Also, we are unclear what “states should support and assist...” means. Does this just refer to technology R&D or encompass other support like subsidies? We question the focus on reducing non-organic fertiliser here when there is clear evidence that in some places (e.g. Africa) fertiliser use is too low and there isn’t enough organic fertiliser to sustain ongoing crop yields. This advice could jeopardise food and nutrition security.
15	39 3.2.6 d)	We think the second sentence needs further clarification. We do not understand what it means.
16	40 3.3	It would be helpful to provide a definition for ‘food environments’ and also an explanation of the types of policies and programmes that are effective in creating them (based on evidence). Also we again suggest replacing “healthy diets” with “healthy foods”. Sentence two and three are clunky and poorly written. The assumption that nutritious food that comes from further away is less affordable is questionable - can evidence be provided for this statement?
16	40 3.3.1 a)	It would be very helpful to elucidate the evidence base to support this recommendation and demonstrate the efficacy of zoning laws in delivering better nutrition outcomes. Specifically, where has this worked in the past and how have such laws been designed? Also, how does this approach deal with issues raised previously, such as transport, storage, infrastructure, poor weather data, and climate change impacts?
16	40 3.3.1 b)	Don’t disagree with reducing the density of fast-food vendors that sell less nutritious foods, but what about food in supermarkets that has low or zero nutritional value, as well as products that are marketed as being healthier but actually aren’t or have poorer environmental outcomes?
16	40 3.3.1 d)	We suggest adding additional material to describe the positive impact that trade can have on physical access to adequate nutritious food: “Liberalising international trade can increase access to a wider variety and larger volume of nutritious foods that would otherwise not be available to consumers in a domestic market. Reducing import tariffs on nutritious foods for example would make these more affordable for consumers.”
16	40 3.3.1 e)	Does this mean that a voucher would tell people what food they could buy? And what are the “more nutritious foods” that would be provided instead of rice or wheat flour?
17	40 3.3.2 b)	These incentives should be available to both domestic and imported products.
17	40 3.3.2 c)	We query the implication that local/family farmers are superior in terms of providing nutritious foods, by definition, to imported foods. Further, the suggestion that they provide stable markets appears as protectionism and we argue this this does not help keep prices for nutritious products down or mean that these are grown/ produced in the most environmentally-friendly or economically-efficient way. We think this recommendation should be deleted.
17	3.3.3 a)	We do not support use of input subsidies, access to credit, and tax mechanisms as means to influence pricing policies of perishable fruit and vegetables. We would like this suggestion to be deleted.

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		We note reference to trans-fats here and note that the WHO recommends reducing saturated fatty acids in food and replacing them with unsaturated fatty acids in the global action plan for the prevention and control of non-communicable diseases. <a href="https://apps.who.int/iris/bitstream/handle/10665/94384/9789241506236_eng.pdf?sequence=1">https://apps.who.int/iris/bitstream/handle/10665/94384/9789241506236_eng.pdf?sequence=1</a>
17	40 3.3.3 b)	This recommendation may overlook the fact that the vast bulk of the world's farmers produce low value commodity products (e.g. rice, corn) not high nutrient foods. We are also not in favour of promoting agricultural subsidies, which may be trade distorting and environmentally harmful. We do not consider this to be an appropriate fiscal mechanism to reduce the price of nutritious food as this also has negative impacts on international trade, including market prices and volatility. This is directly contrary to NZ's approach and to our trade policies. We would like this suggestion to be deleted.
17	40 3.3.3 c)	We query the wisdom of this recommendation, which seems to suggest that national and local governments should (financially?) support the private sector to sell different food. Further, improving food availability does not equate to improving access, utilization and affordability.
17	40 3.3.4 a)	Suggest states and researchers should also recognise their own role, and the role of mainstream media and lobby groups in spreading misinformation, pseudoscience and unsubstantiated or oversimplified claims for or against different foods and food production systems.
17	40 3.3.4 b)	What are "nutritious food options" in this context and how does this account for different groups having different nutritional requirements? Also, this advice perhaps assumes that people will know what this information means and how to interpret it.
17	40 3.3.4 c)	This is an interesting idea, but we would like to better understand how is it proposed that environmental sustainability be assessed through the CODEX framework when the purpose of CODEX standards is to ensure that food is safe and can be traded?
18	41 3.4.1 a)	Adolescent should be included in this group consistent with the groups described in paragraph 8 (page 3). Adolescent girls are included in "women of reproductive age"
18	41 3.4.1 c)	Details on what metrics should be included in front-of-pack nutrition labelling should be removed i.e. reference to overall fat quality, trans-fat and carbohydrate quality. Nutrients/ food components incorporated into a front-pack-labelling scheme should align with each country's dietary guidelines. Further, these suggested inclusions are not aligned with the draft WHO guiding principles and framework manual for front-of pack labelling for promoting healthy diet. The WHO recommend that the focus of front of pack labelling should be on the mandatory list of nutrients categorized in CODEX Guidelines (i.e. total fat, saturated fatty acids, total sugars and sodium).
18	41 3.4.1 e)	We are not sure this approach fits with the farmer's market approach proposed earlier in the document and also why the private sector would do this if they can't make a return on their investment (i.e. ensure their economic sustainability). Reference: <a href="https://www.who.int/nutrition/publications/policies/guidingprinciples-">https://www.who.int/nutrition/publications/policies/guidingprinciples-</a>

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		<a href="#">labelling-promoting-healthydiet.pdf?ua=1</a>
18	41 3.4.2 a)	We are very sceptical about how governments would do this and whether it would be a helpful move, especially given that even within national jurisdictions there is significant social, cultural, economic and ecological and demographic diversity. Defining a sustainable healthy diet at the national level therefore appears highly problematic.
18	41 3.4.2 b)	We do not disagree with this proposal but think it is important to acknowledge that parents are generally responsible for purchasing the food and supermarkets also play a role e.g. putting sweets at children's eye level at checkouts.
18	41 3.4.2 c)	Again, we do not disagree with this proposal but suggest it is important to factor in that consumer understanding of this information may be low. Also would need to build flexibility into such a system to enable incorporation of changing science e.g. how the understanding of the relative benefits of butter vs. margarine has shifted over time. Would also need to be wary of the impact that poor science can have on media, politicians and consumers.
19	41 3.4.2 g)	The effectiveness of this recommendation in terms of supporting producers is contingent on the market responding positively to "increasing the production of high nutrient density crops and crop diversification" in terms of greater returns, otherwise a farmer may well be worse off.
19	41 3.4.2 j)	This recommendation focuses on waste from food that makes it to a market, but also ought to include food that is lost within the production system i.e. doesn't make it past the farm gate or spoils on the way to the market/processor.
22	43 3.6.3 a)	We are unclear of the value of integrating early warning systems with "broader food analysis systems including the monitoring of available and affordable nutritious food at the local level", when dealing with the "threats to livelihoods" is the key issue being addressed in the recommendation.