



CFS Voluntary Guidelines on Food Systems and Nutrition
(VGFSyN)
Draft One

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PART 1 - INTRODUCTION

1.1 BACKGROUND AND RATIONALE

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 security¹, ~~the realization of the human right to adequate food and health~~, and the implementation of the 2030 Agenda for Sustainable Development. The impacts of malnutrition and its various manifestations have profound consequences

¹ Food security exists when all people, at all times, have physical, economic and social access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life. **NB: Insert the source: WFS 1996 and FAO early 1997 (FAO added 'social' to physical and economic)**

Commented [WBE1]:

Comment 1: What is meant is *human* rights, and so it should be said, at least in the more fundamental parts of the text.

Comment 2: Because nutrition is a condition for health, the right to health must be noted as parallel to and interacting with the right to adequate food. This is done in p.17.

on people's health and wellbeing, physical and cognitive development, lives and livelihoods throughout their lifetimes and from one generation to another.

2. Malnutrition in all its forms is associated with various forms of ill health and increased levels of mortality. Undernutrition is a major cause of death among children under five while newborns with a low birth weight are more frequently affected by infectious diseases during early life and are predisposed to higher risk of contracting non-communicable diseases (NCDs). Stunting and wasting continue to represent significant challenges to achieve the 2030 goals and targets. While wasting, also known as acute malnutrition, represents a greater risk of mortality and morbidity, stunting, or chronic malnutrition is associated with delays in both physical growth and cognitive development. The co-existence of wasting and stunting, as well as stunting and obesity in children under the age of five poses major risks in some regions. Overweight and obesity are increasing in every region, with rural areas catching up to urban settings.

Commented [LET2]: Add "in adulthood" or "later in life"

3. Micronutrient deficiencies related to the inadequate intake of iron, vitamin A, folate, vitamin D and zinc, affect a large proportion of the global population with serious consequences on health, wellbeing, and development. Children under five, adolescent girls, women of childbearing age, and pregnant women have specific nutritional requirements across their lifecycles and are at risk of being affected by anaemia, in particular iron deficiency anaemia. Also referred to as "hidden hunger", micronutrient deficiency increases vulnerability to infection, birth defects, and impaired development, and lowers life expectancy.

Commented [LET3]: Iodine should also be mentioned, since deficiency still affects millions with severe consequences.

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.

Commented [LET4]: The consequences of overweight and obesity include more aspects, e.g. [overweight and obesity during pregnancy may have negative consequences](#) for foetal development, increases the risk of adverse pregnancy outcomes and has impact beyond intrauterine and neonatal life to childhood, adolescence and adulthood. See also: <https://www.ncbi.nlm.nih.gov/pubmed/27743978>

5. The social and economic impacts of malnutrition in all its forms is very high on societies as it is transmitted across generations. Malnourished mothers are more likely to have low-birth-weight babies with higher risk of becoming malnourished children and adults. The effects of malnutrition in children result in reduced stature, poor school performance, reduced economic productivity and opportunities, and increased vulnerability to NCDs and other chronic diseases. These diseases lead to higher spending on health care, putting significant burdens on national health care systems and economies.

Commented [LET5]: Here, malnourished implies "undernourished", whereas mothers suffering from obesity are more likely to have offspring with a higher bodyweight and higher fat percentage. The severe consequences of the increase in overweight and obesity should be given more emphasis.

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.

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.

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 poverty.

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.

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.

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.

12. Current global food systems, with their excessive consumption 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.

13. Fostering policy, institutional and behavioural changes among [actors in various types of food systems](#) ~~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 [food for](#) sustainable and healthy diets.

14. New policies are required to address policy fragmentation and its subsequent negative impact on nutrition. ~~They must~~ ~~ones that are~~ [innovatively](#) designed and coordinated across sectors such as health, agriculture ~~and food systems~~, education, environmental [management](#), water, sanitation, gender, social protection, trade, employment, and finance – all of which impact nutrition outcomes.

15. The Committee on World Food Security (CFS) has undertaken a policy process to produce [a set of](#) Voluntary Guidelines on Food Systems and Nutrition (VGFSyN). The preparation of these Guidelines is informed by the findings and scientific evidence provided in the [High Level Panel of Experts on Food Security and Nutrition's \(HLPE\)² Report on Nutrition and Food Systems](#). The preparation of the VGFSyN is also informed by a consultation process that took place between May and November 2019 which involved participation of CFS stakeholders in meetings in Rome, Ethiopia, Thailand, Hungary, Egypt, Panama, and the United States of America, as well as through an ~~an~~ [open global](#) E-Consultation.

16. This policy process is taking place at the same time as a variety of 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~~ ~~are~~ recognized as ~~an~~ ~~essential~~ ~~component~~ ~~co-determinants for~~ ~~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 forms³. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025)⁴ 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~~ ~~has been~~ given by a number of UNGA Resolutions⁵, the UN Economic and Social Council (ECOSOC)⁶, the UN Environment Assembly⁷,

² The HLPE is the science-policy interface of CFS and provides a structured evidence base to inform CFS policy discussions drawing on existing research and knowledge, experiences, and policies at different scales and in different contexts.

³ FAO/WHO. 2014. ICN2, [Rome Declaration on Nutrition](#).

⁴ United Nations General Assembly Resolutions 70/259 available at <https://undocs.org/A/RES/70/259> and 72/306 at <https://undocs.org/A/RES/72/306> - The Work Programme of the UN Decade of Action on Nutrition is available at:

https://www.un.org/nutrition/sites/www.un.org.nutrition/files/general/pdf/mv131_rev1_undoa_wp_rev1_en.pdf

⁵ UNGA Resolutions [A/RES/73/2 "Political declaration of the third high-level meeting of the General Assembly on the prevention and control of non-communicable diseases"](#), [A/RES/73/132 "Global health and foreign policy: a healthier world through better nutrition"](#), [A/RES/73/253 "Agriculture development, food security and nutrition"](#).

⁶ [Ministerial Declaration of the 2018 High-Level Political Forum on Sustainable Development](#)

⁷ [Ministerial Declaration of the 2019 United Nations Environment Assembly](#)

the World Health Assembly (WHA)⁸ and the UN Special Rapporteur on the Right to Food [of the UN Human Rights Council](#)⁹.

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 Action¹⁰ recommendations in support of the progressive realization of the [human](#) right to adequate food in the context of national food security and of the right to health, and of the achievement of SDG 2¹¹, with particular attention to targets 2.1¹², 2.2¹³ and 2.4¹⁴. 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).

1.2 OBJECTIVES AND PURPOSE

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.

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 [nutritional](#) quality while conforming "with beliefs, culture and traditions, dietary habits, and preferences of individuals, in accordance with national and international laws and obligations"¹⁵.

20. The VGFSyN follow a comprehensive, systemic, and evidence-based approach to addressing policy fragmentation with a special emphasis on the food, agriculture, and health sectors, while also addressing the [challenges of social, environmental and economic sustainability](#). The VGFSyN are expected to address the complexity of food systems with the intention to promote policy coherence and foster and guide dialogue among different institutions and sectors.

Commented [WBE6]: replace with: challenges of unsustainable social, environmental and economic conditions.

(Comment: sustainability is not a challenge...)

⁸ The World Health Assembly has endorsed the [Comprehensive implementation plan for maternal, infant and young child nutrition](#), and the [WHO Global action plan for the prevention and control of noncommunicable diseases 2013-2020](#), which delineate policy options for the prevention of malnutrition in all its forms and the promotion of healthy diets.

⁹ [A/71/282 "Interim report of the Special Rapporteur on the right to food"](#)

¹⁰ FAO/WHO. 2014. ICN2, [Framework for Action](#).

¹¹ SDG 2, "End hunger, achieve food security and improved nutrition and promote sustainable agriculture".

¹² Target 2.1, "By 2030 end hunger and ensure access by all people, in particular the poor and people in vulnerable situations including infants, to safe, nutritious and sufficient food all year round".

¹³ Target 2.2, "By 2030, end all forms of malnutrition, including achieving, by 2025, the internationally agreed targets on stunting and wasting in children under 5 years of age, and address the nutritional needs of adolescent girls, pregnant and lactating women and older persons".

¹⁴ Target 2.4, "By 2030, ensure sustainable food production systems and implement resilient agricultural practices that increase productivity and production, that help maintain ecosystems, that strengthen capacity for adaptation for climate change, extreme weather, drought, flooding and other disasters and that progressively improve land and soil quality".

¹⁵ FAO/WHO. 2014. ICN2, [Rome Declaration on Nutrition](#). Paragraph 5.b.

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.
22. The VGFSyN are intended to be global in scope and to provide guidance to policy-makers and relevant stakeholders when designing context-specific policies, strategies, plans and programmes. They take into consideration different national realities, capacities and levels of development, as well as different types of food systems and the many drivers impacting them.
23. Moreover, the VGFSyN provide guidance to relevant actors involved in humanitarian contexts in order to bridge the gap between humanitarian and development work and integrate nutrition and longer-term strategies for sustainable development into emergency and humanitarian responses, with a view toward strengthening the resilience and adaptive capacity of food systems.
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:-based~~
- a) biophysical and environmental (natural resource and ecosystem services, biodiversity, climate change, water, and soils);
 - b) innovation, technology, and infrastructure;
 - c) political and economic (leadership, globalization, foreign investment, trade, food policies and regulatory frameworks, land tenure, conflicts, and humanitarian crises);
 - d) socio-cultural (culture, religion, rituals, social traditions, poverty, inequalities, and women's rights and empowerment);
 - e) demographic drivers (population growth, age distribution, urbanization, migration, and forced displacement).

1.3 NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS

25. The VGFSyN are non-binding and should be interpreted and applied consistently with existing obligations under relevant national and international law, including the Universal Declaration of Human Rights and other international human rights instruments, and with due regard to voluntary commitments under applicable regional and international instruments. CFS guidance should build on and integrate existing instruments and frameworks for action adopted in the context of the UN system, including Member States-endorsed guidance and recommendations.

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:

Commented [WBE7]: Of 1948

Commented [WBE8]: Replace 'other' with 'later' (because UDHR has a special position as the 'mother' instrument of international human rights law and later instruments should be seen as subsequently derived from it, not just paralleling it)

Commented [WBE9]: All human rights instruments are in principle applicable and can cause confusion (for example as if they were not all applicable in a certain culture). The word here should be 'relevant' (for the purpose).

Commented [WBE10]: Would re-sequence: 'international and regional

(because: International instruments usually are coming first and regions may subsequently make their own inspired by them)

- [CFS Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of the national food security](#) (2004),
- [CFS Voluntary Guidelines on the responsible governance of tenure of land, fisheries and forests in the context of national food security – VGGT](#) (2012),
- [CFS Principles for responsible investment in agriculture and food systems – RA1](#) (2014), and
- [CFS Framework for Action for food security and nutrition in protracted crises – FFA](#) (2015)
- [CFS Policy Recommendations on Connecting Smallholders to Markets](#) (2016).

Commented [WBE11]: This is incorrect as the process towards them was managed by FAO and the guidelines endorsed by the FAO Council in 2004, before the reform of the CFS. Please correct.

Commented [LET12]: The “and” should be moved to after the next line

27. The VGFSyN are primarily targeted at governments to help them design public policies. They are also meant to be used in policy discussions and implementation processes by relevant stakeholders such as:

- a) Governmental actors, including relevant ministries and national, sub-national, and local institutions, and parliamentarians;
- b) Intergovernmental and regional organizations, including specialized agencies of the UN;
- c) Civil society organizations, including those representing indigenous people, vulnerable groups and communities;
- d) Private sector;
- e) Research organizations, academics and universities;
- f) Development partners, including international financial institutions;
- g) Private donors, foundations and funds;
- h) Consumer protection associations;
- i) Farmer organizations.

PART 2 - KEY CONCEPTS AND GUIDING PRINCIPLES

2.1. KEY CONCEPTS CONCERNING FOOD SYSTEMS AND NUTRITION

28. **Food systems** “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”¹⁶.

29. **Sustainable food systems** “are food systems that ensure food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition of future generations are not compromised”¹⁷.

Commented [WBE13]: A special definition of *Food environments* should follow and with new number (30). It is of fundamental importance that both are defined here in sequence, as the latter is subsumed under the wider food system to more defined localities but with a richer meaning. Much research is currently going which uses these distinctions which must be reflected here.

¹⁶ HLPE. 2014. [Food Losses and Waste in the context of Sustainable Food Systems](#). A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.

¹⁷ HLPE 2017b

~~29-30.~~ Food environment...

~~30-31.~~ **Sustainable and healthy diets** “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”¹⁸.

Commented [WBE14]: (JSR) Only in the definition is "wellbeing" added to health as an important outcome of sustainable and healthy diets. Throughout the document "wellbeing" is only used a few times. It is an important outcome, e.g. for school food provision, a subject matter which should receive a much greater focus in the draft.

~~32.~~ **The right to adequate food** *is legally established in international human rights law and* “is realized when every man, woman and child, alone or in community with others, have the physical and economic access at all times to adequate food or means for its procurement”¹⁹.

~~31-33.~~

2.2. GUIDING PRINCIPLES FOR RESHAPING OR PROMOTING SUSTAINABLE FOOD SYSTEMS

~~32-34.~~ 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.

~~33-35.~~ The VGFSyN include a number of guiding principles²⁰ that should be followed to contribute to reshaping or promoting sustainable food systems, enabling sustainable and healthy diets, improving nutrition, and promoting sustainable development.

~~34-36.~~ These guiding principles are:

- a) **Systemic, holistic and evidence-based approach.** 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.
- b) **Coherent and context-specific policies.** Contribute to the formulation and implementation of coherent, context-specific and evidence-based policies and related investment through

¹⁸ Adapted from [FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome](#)

¹⁹ The definition of the right to adequate food is given by [the Committee on Economic Social and Cultural Rights \(CESCR\) which, through the general comment 12](#), is interpreting Article 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR).

²⁰ These guiding principles make reference to already agreed international documents and tools, such as the Rome Declaration on Nutrition and the Framework for Action of ICN2.

coordinated actions among different actors and across all relevant sectors at international, regional, national, subnational, and local levels.

- c) **Governance and accountability.** Support efforts in strengthening governance and accountability mechanisms that contribute to fostering citizen participation in national debates on food security and nutrition, and transparent and inclusive decision-making processes.
- d) **Healthy people, healthy planet.** 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.
- e) **Gender equity and women's empowerment.** 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.
- f) **Nutrition knowledge and awareness.** 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.

g) **Realization of the Right to Adequate Food.** States Parties to the relevant international human rights Conventions⁽⁴⁾ (Refs.?) will, progressively and through graded involvement, respect, protect, promote and facilitate as needed people's ways of procuring. Promote the progressive realization of the right to adequate food in the context of national food security, and only in special situations directly provide food to particularly vulnerable groups or destitutes where other ways have failed. Realization of the right to adequate food means going beyond ensuring minimum requirements a minimum package of calories, proteins and other specific nutrients** (Ref to CESCR GC12), and include access to food that is nutritionally adequate, safe and culturally acceptable, assisted as appropriate by civil society organizations. Other non-state actors such as businesses, including food related businesses, will respect this right in their activities, as guided by the UN Human Rights Council. *** (Ref. to UN Guiding Principles on Business and Human Rights, 2011)

g)h) **Capacity building.** 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.

Commented [WBE15]: "..., including children and youth in accordance with their right to be heard*".

*ref to CRC and its GC16 of the UN Committee on CRC

Commented [WBE16]: the *human* right to adequate food

Commented [WBE17R16]:

Commented [WBE18]: move up g) as b) as the natural place since the VGFSyN is subsequently said to *be based on* the principles of the right to adequate food, in para 35 below, it is therefore natural that some such principles be presented early in the list of guiding principles.

Commented [WBE19]: * Especially the ICESCR (International Covenant on Economic, Social and Cultural Rights) and the CRC (UN Convention on the Rights of the Child), see footnote...

Commented [WBE20]: ** Footnote with interactive ref.: UN Committee on Economic, Social and Cultural Rights (CESCR) (1999) General Comment no 12 on the Right to Adequate Food, see footnote 19.

Commented [WBE21]: "ensuring minimum requirements" is inappropriate here, also nutritionally adequate is too narrow - suggest replacing the first with the citation from GC12 from CESCR in footnote 19, and expand the end of sentence, thus altogether:
...going beyond **a minimum package of calories, proteins and other specific nutrients*** and including access to food that is nutritionally adequate, **safe and culturally acceptable.**
* reference to CESCR GC12 as in footnote 19

Commented [WBE22]: *** footnote with interactive reference "UN Guiding Principles on Business and Human Rights", 2011, UN Geneva."

PART 3 - THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION

~~35-37.~~ The VGFSyN provide guidance on actions at multiple points across food systems, recognizing that food systems are interconnected and that any action to address one part will impact another. These actions can have both benefits and unintended consequences. Founded upon the principles of the right to adequate food and other related and relevant rights, the VGFSyN provide a framework to promote policy coherence and to bring various stakeholders ~~— people and organizations — who are involved in food systems~~ to work holistically ~~and~~ together to ~~deliver-wards~~ sustainable opportunities for all for accessing healthy diets for optimal nutrition outcomes; these stakeholders are people as rights-holders and the various actors in public agencies and organizations who are involved in larger or smaller food systems, as duty-bearers.

Commented [WBE23]: ... and other related and relevant rights,

~~36-38.~~ The VGFSyN provide policy entry points, tools, and mechanisms across the constituent elements of food systems, namely food supply chains²¹, food environments²², and consumer behaviour²³. They provide a range of actions that States and other actors can consider to improve food systems to achieve better nutrition outcomes, with governments being critical in orchestrating effective enabling environments.

~~37-39.~~ This part is structured around the following six main sections:

- on governance of food systems which underpins and cuts across the other five sections;
- on food supply chains which determine the availability of safe and nutritious food;
- on actions to be taken to ensure accessibility of sustainable and healthy diets;
- on the notion that people are central to nutrition knowledge and education;
- 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;
- on humanitarian contexts.

3.1 TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS

~~38-40.~~ 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.

3.1.1 Building on multi-sectoral actions and coordination

- 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

Commented [WBE24]: This sub-point 3.1.1 deals with *means and conditions* rather than *goals or objectives* such as do the following 3.1.2 - 3.1.3. The sequence should therefore start with the present 3.1.2, 3.1.3, followed by present 3.1.1, properly re-numbered. The new 3.1.3 could start: "All the above elements of governance presuppose multi-sectoral actions and coordination. States should therefore facilitate..."

²¹ Food supply chains "consist of the activities and actors that take food from production to consumption and to the disposal of its waste", including production, storage, distribution, processing, packaging, retailing and marketing. HLPE 2017b

²² Food environments "refer to the physical, economic, political and socio-cultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food". HLPE 2017b

²³ Consumer behaviour "reflects all the choices and decisions made by consumers on what food to acquire, store, prepare, cook and eat, and on the allocation of food within the household". HLPE 2017b

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; this should include children and youth.

- 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.
- c) States and inter-governmental organizations should encourage increased financial investment to support food systems that deliver or make it possible to compose sustainable and healthy diets.

Commented [WBE25]: Addition:

Such dialogue should also include discussions of how to avoid harmful commercial practices that can negatively affect people's access to productive land, food choices, health o.a.

3.1.2 Promoting policy coherence by integrating nutrition into national development

- 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, and necessary public regulations.
- 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.
- 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. This requires openness on the part of leaders and executives in all sectors to look beyond conventional approaches and interface as needed with those of other sectors.
- d) States, UN agencies, and international organizations should identify opportunities to achieve national and global food and nutrition targets set out by the WHA and the SDGs.

Commented [WBE26]: Only schools and other institutions

can directly deliver sustainable and healthy diets! In all other situations food systems should offer the potential for making such diets. UN language should avoid slogans that cover up for complex processes...

3.1.3 Instituting accountability mechanisms, monitoring and evaluation

- a) States should institute strong and transparent accountability 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) 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.

- 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/dietary intake~~ 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.

Commented [WBE27]: the other way round from how it stood:
Consumption as the economic term precedes intake

3.2 SUSTAINABLE NUTRITION-ORIENTED FOOD SUPPLY CHAINS IN THE CONTEXT OF CLIMATE CHANGE

39-41. Food chains operate at assorted scales and levels, from the shortest supply chains, to long, highly complex and globalized chains. The decisions made by the actors at any stage have implications on the availability, affordability, accessibility, acceptability, and safety of nutritious food for a healthy diet. Climate change and other environmental constraints are also making food supply more challenging.

3.2.1 Ensuring sustainable use and management of natural resources

- 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.
- 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.
- 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.
- d) States and private sector food actors should protect the biodiversity of forests and fisheries that are currently over-sourced, over-exploited, and endangered, by implementing the VGGT and other relevant international agreements.
- e) States should promote the diversification of crops and animals including neglected and underutilized traditional crops, fruit, vegetables, legumes, nuts, and seeds, and animal-source food, applying sustainable food production and natural resource management practices.
- f) States should protect the rights of indigenous people and other 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.

3.2.2 Promoting nutrition within agriculture and food production

- a) States should promote nutrition-sensitive agriculture and diversified food production through the integration of nutrition objectives into national food and agriculture policies.
- 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.
- 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.
- 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.
- 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.
- 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.

f) (suggest added) Farmings systems research should be encouraged and broadly designed to identify where at different points in food chains nutrition sensitive action should be applied in order to enhance the potential to deliver foods for healthy diets.

3.2.3 Improving food storage, processing, transformation and reformulation

- 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 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) 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.
- 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.
- d) States should establish guidance for the use and scale-up of processing technologies that can improve the nutritional content of 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-farm 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.
- 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.
- 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.

Commented [LET28]: Pls reconsider the use of “nutritious” and “less nutritious” foods and consider use “healthy/unhealthy food” with a definition of these. A food can be nutritious but unhealthy (e.g. if fortified) and likewise it can contain fewer nutrients but still be considered healthy (e.g. vegetables such as cucumber, lettuce etc).

3.2.4 Making markets work for nutrition

- a) To reduce food price volatility of nutritious food, states should promote transparency across food-related market transactions in real-time, with more emphasis on nutritious commodities, including enhanced tracking of food supply and stock data, and future prices.
- b) States should increase public investment in market infrastructure (roads and bridges, physical markets, storage facilities), to reduce transaction costs and enhance food market performance particularly for perishable and nutritious food.
- c) States and private sector actors should support smallholders to meet safety and quality standards of nutritious food that enable them to fulfill demand for the local consumption whilst reaching broader markets and getting higher profits for their products.

3.2.5 Improving nutrition and health of farm and food system workers

- 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) 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.

3.2.6 Prioritizing climate adaptation and mitigation

- 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.
- 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).
- 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.
- 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.
- 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.
- 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.

3.2.7 Empowering youth in food systems

- a) States should engage and empower youth by enhancing their access to productive land, natural resources, inputs, productive tools, extension, advisory service, and financial services, education, training, markets, information, and inclusion in decision-making.
- 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.

Commented [WBE29]: (JSR) The draft does not address measures to promote nutrition for children and youth satisfactorily in the current draft. This is the only section focusing on youth alone. An alternative title of section 3.2.7 is Empowering youth in the food supply system. A *new* section on the need to especially promote and protect children and youth's nutrition, health and wellbeing should be included in 3.3 or 3.4.

- 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.

3.2.8 Supporting food safety across food supply chains

- 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.
- 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 *Codex Alimentarius Commission* on nutrition and food safety, States should implement, as appropriate, internationally adopted standards at the national level.
- 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.
- 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 *Codex Code of Practice CAC/RCP61-2005*.

3.3 EQUITABLE ACCESS TO SUSTAINABLE AND HEALTHY DIETS

~~40-42.~~ 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. Nutritious food can also be unaffordable, particularly food that is perishable or comes from a longer distance.

3.3.1 Improving physical access to nutritious food

- a) States should ensure people's physical barriers are minimized to purchase or order diverse types of nutritious food in a given food environment. This can be done by instituting policies that encourage healthy outlets to populate "food deserts"²⁴ with markets that sell nutritious, affordable food, and stop the spread of "food swamps"²⁵ by creating robust zoning laws that restrict food retail outlets which sell an overabundance of less nutritious food.

²⁴ "Food deserts" are geographic areas where access to food is restricted or non-existent due to low density of "food entry points" within a practical travelling distance. HLPE 2017b

²⁵ The term "food swamps" describes areas where there is an overabundance of less nutritious food but little access to nutritious food. HLPE 2017b.

- 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.
- 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.
- d) States should improve the availability and access of the food supply through appropriate trade and investment agreements and policies and ensure that such agreements and policies do not have a negative impact on the realization of the right to adequate food in other countries.
- e) States should facilitate access to nutritious food for poor households through vouchers, cash or food supplement programmes. These programmes could substitute basic staple food (such as rice or wheat flour) with more nutritious food in the food basket provided to poor households.

3.3.2 Improving the availability of nutritious food

- 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.
- 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)~~c) States should ensure that there are clear, consistent public procurement standards in public sector settings for food service activities to provide and promote healthy food choices.
- d) 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 food system benefits by establishing stable markets for producers while serving more recommended, healthy diets to children.

3.3.3 Making nutritious food more affordable

- 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.
- 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.
- c) States and local governments, in collaboration with consumers' associations, can institute regulations and incentives to help existing food retailers increase the number and variety of

Formatted: English (United Kingdom)

Commented [WBE30]: Liv Elin Torheim: Suggest adding: States should ensure that there are clear, consistent public procurement standards in public sector settings for food service activities to provide and promote healthy food choices.

Commented [WBE31]: JSR: Rather: "States should strengthen public procurement systems to ensure nutritious food is more..."

Commented [WBE32]: JSR: Also, standards for food and meals in schools should be mentioned here, as it is important for children's access.

Furthermore, unless a new separate section on children and youth is added, it should be mentioned here that States should ensure that schools and pre-school establishments are free from all forms of marketing of unhealthy foods, as given in the WHO Set of recommendations on.... from 2010. As explained in these, marketing techniques include advertising, sponsorship, product placement, sales promotion, cross-promotions using celebrities, brand mascots or characters popular with children, web sites, packaging, labelling and point-of-purchase displays, e-mails and text messages, philanthropic activities tied to branding opportunities, and communication through "viral marketing" and by word-of-mouth. (JSR)

Commented [WBE33]: (BM) Also "farm to school" programme.

Another initiative could be school gardens. In case a section on 'Youth' is added it could include 'school' gardens as one way of improving availability, as well as way of promoting home grown school meals.

nutritious food products they sell. This can be done by creating local food policy councils to give residents a voice in how best to improve access to healthy diets in their communities.

- 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 retail, manufacturing, or agricultural incentives to reduce the price of nutritious food.

3.3.4 Monitoring new technologies and trends for healthy diets

- 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.
- 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.
- 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.

3.4 PEOPLE-CENTERED NUTRITION KNOWLEDGE, EDUCATION AND INFORMATION

41-43. 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.

3.4.1 Putting people at the centre of nutrition knowledge, education and information

- a) States should pay particular attention to dietary and nutritional 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.
- 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.
- c) States, civil society community leaders, and health professionals should promote food culture amongst communities, including access to culinary skills and stressing the importance of food

Commented [WBE34]: Suggest added: States should encourage continued research on these issues to select, expand and disseminate updated evidence as manifested and understood in given and often changing contexts.

within cultural heritage, as a vehicle to promote nutrition literacy. This can be done through community participation, associations and educational institutions.

- d) States should protect and promote the knowledge that indigenous people have with regard to methods of producing, preparing and preserving food that imparts nutritional and environmental benefits.
- 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.

3.4.2 Utilizing policies and tools to increase knowledge, education and information

- 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.
- 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.
- 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.
- d) States should regulate the marketing of commercial infant formula and other breast-milk substitutes and implement the full set of WHO recommendations on the marketing of breast-milk substitutes and of food and non-alcoholic beverages to children. The International Code of Marketing of Breast-milk Substitutes²⁶ needs to be enforced through accountability mechanisms and international legislative enforcement.
- e) Private sector food actors should consider the design of food markets, restaurants and other places where food is sold or served to shape nutritious food choices and decision making. Incentives, sales and discounts should be put into place that encourage the placement and promotion of nutritious food products in retail spaces.
- f) States, chefs, dietitians, private sector food actors and NGOs should implement nutrition education and information interventions based on Food-Based Dietary Guidelines and other policies related to food and diets, through improved school curricula, nutrition education in the health, agriculture and social protection services, and community interventions.
- g) States should consider the inclusion of nutrition information within agriculture extension technical packages as a way to support producers in increasing the production of high nutrient density crops and crop diversification.
- h) NGOs, dieticians, and chefs should consider coupling nutrition education and counselling with maternal and child nutrition programmes (e.g. food supplements, micronutrient supplements, or conditional cash transfers) to double down impacts on dietary and nutritional outcomes.

Commented [WBE35]: JSR The issue of food marketing of unhealthy foods to children and youth must be addressed before this point about marketing nutritious foods.

Commented [LET36R35]: Additionally, the term "nutritious food" may here be misleading as unhealthy food may be fortified with nutrients and thus be "nutritious" in one aspect but is nevertheless unhealthy.

Commented [WBE37]: JSR This heading is not reflective of the contents below. An alternative: Utilizing policies and tools to promote food environments conducive to healthy and sustainable diets

Commented [WBE38]: JSR "Nutrition standards" for what? In this context these seems to relate to school food. A focus on protecting children from adverse health outcomes and promoting healthy diets among children and youth through educational setting deserves its own section.

Commented [WBE39]: JSR "Marketing in all its forms" should be used instead of "advertising", which is a much narrower concept. Reference should be made to resolution WHA63.14 and the WHO Set of recommendations.

Commented [LET40R39]: Restriction should concern both broadcast media, digital media, other media (including outdoor), where children gather and also include food packaging.

Commented [WBE41]: JSR "and ON THE MARKETING of food and non-alcoholic beverages to children".

²⁶ [International Code of Marketing of Breast-Milk Substitutes](#). WHO, 1981. Geneva.

- i) States, UN and NGOs should promote social and behavior change communication (SBCC) and social support interventions as a way to improve nutrition. SBCC can be used by different actors as a way to influence behaviour change by positively influencing knowledge, attitudes and social norms, coordinating messaging across a variety of communication channels to reach multiple levels of society.
- j) States, chefs and private sector food actors should educate all food system stakeholders to prioritize the reduction of food waste. Actions could include awareness campaigns at national, regional and global levels, labelling schemes, and updating Food-Based Dietary Guidelines to align recommendations with policies and programmes to tackle food waste.
- 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, religious leaders, chefs**, supermarket buyers, 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.

Commented [WBE42]: ...community leaders, religious leaders, chefs...

3.4.3 Promoting "hubs" for nutrition knowledge, education and information

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

Commented [WBE43]: JSR The role of schools and pre-school establishments in promoting and protecting the health of children is much more important than to refer to "hubs" for such promotion. The reference to the promotion of communal meal times and socializing is very important and should be elaborated on. But again, schools and worksites should be treated in different sections (ref to the letter b)

Commented [WBE44]: JSR As already mentioned in section 3.4.2b states should develop nutrition standards. This also relates to the procurement text in 3.3.2c.

3.5 GENDER EQUITY AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS

42-44. Gender relationships and norms are among the most significant drivers of healthy diets. In many countries, women make decisions about the household's diet and, as primary caregivers, they have an influence on the family's nutritional status. Therefore, women's and girl's empowerment through education, information and access to resources and services is key to improving nutrition. Improving women's wellbeing, ensuring access to financial, technical and biophysical resources, improving agency, voice and status, and challenging the power relationships that limit choices, are promising policy entry points to empower women and ultimately, improve food security and nutrition.

3.5.1 Recognizing women's nutritional status and deprivation

- a) States, UN agencies and NGOs should prioritize the nutritional wellbeing of adolescent girls and women and provide health and nutritional care and services through various sectors. This can be done by ensuring they are central to national development strategies, and the recipients of

social protection policies and benefits, which can break the inter-generational cycle of malnutrition.

- 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.
- c) States should create an enabling environment to promote breastfeeding, ensuring that decisions to breastfeed do not result in women losing their economic security or any of their rights. This would include removing workplace-related barriers to breastfeeding (breaks, facilities, and services) and labour laws to protect women who chose to breastfeed.

Commented [WBE45]: rather: meals

3.5.2 Promoting and acknowledging women as food system entrepreneurs

- 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 promote access to education, training, markets, and information in line with the VGGT. 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.
- b) States should enhance women's roles in agriculture by giving women decision-making power over what is produced, why, and how. Women should be offered extension and advisory services for crops and animal products that they produce or process, capacity-building to engage with traders, financial services (credit and savings mechanisms), and innovative entrepreneurial opportunities across food systems.
- c) States should promote labour and time saving technologies for women such as food preservation and processing equipment, cold storage, heat and thermal processing, grinding/blending devices, energy saving stoves, and modern farm equipment for ploughing, cultivating and harvesting nutritious food.
- d) States should facilitate women's access to opportunities to generate income and increase their participation in decisions on the use of household income. This would include activities such as household and business budget training, and tools to help men and women strengthen their intra-household communication and decision-making skills, thus lessening also the overall mental load women may carry as part of their responsibilities of often being primary managers of the household.

Commented [WBE46]: women and men

Commented [WBE47]: **BM** The idea here is to refer to the 'mental load' or 'mental labour' women carry as part of household management - across countries, across socio-economic backgrounds and which is more seldom reported.

Or, a reference to providing tools to women for lessening their mental load could be added as a point (e), since some of the recommendations from point (c) also seem to work toward this goal. Thus, this entire section could gain from being a bit wider than just focusing on 'women as food system entrepreneurs', and also touches on their work within the household and family.

Two recent useful references in this connection: Ciciolla, L., & Luthar, S. (2019). Invisible Household Labor and Ramifications for Adjustment: Mothers as Captains of Households. *Sex Roles: A Journal of Research*, 81(7-8), 467-486.

Robertson, L., Anderson, T., Hall, M., & Kim, C. (2019). Mothers and Mental Labor: A Phenomenological Focus Group Study of Family-Related Thinking Work. *Psychology of Women Quarterly*, 43(2), 184-200.

3.5.3 Empowering women across food systems

- 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 into account.
- 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.

- 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.

3.6 FOOD SYSTEMS AND NUTRITION IN HUMANITARIAN CONTEXTS

~~43-45.~~ This part build upon the 11 principles in the FFA. In situations of humanitarian crises, there is a critical need for nutrition interventions that link humanitarian responses 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.

3.6.1 Improving the nutritional quality of food and nutrition assistance

- a) States, all parties involved in conflicts, natural disasters and food assistance, including humanitarian organizations, should ensure that food security and nutrition assessments are undertaken throughout a crisis. These assessments should adhere to internationally accepted methods, and be impartial, representative and well-coordinated with governments.
- b) States, parties involved in conflict and natural disasters and humanitarian organizations should provide timely, safe, and sufficient 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.
- 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.
- d) States and humanitarian assistance organizations should explore partnerships with industry to ensure micronutrient-fortified food is available through social protection mechanisms and acute malnutrition management programmes, with improved coverage during times of crisis. States, UN agencies and NGOs should work to ensure infant and young child feeding practices are promoted and improved upon during humanitarian crises.
- e) UN agencies and humanitarian assistance organizations should ensure that when implementing cash and voucher assistance, the minimum expenditure basket and transfer value is promoting nutritious food that is locally available and sufficient to provide a healthy diet.

3.6.2 Protecting nutritionally vulnerable groups

- 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.

- b) States and parties involved in conflicts should respect and protect the equal and unhindered access of all members of affected and at-risk populations to food security and nutrition assistance, in both acute and protracted crises, in accordance with internationally recognized humanitarian principles, as anchored in Geneva Convention of 1949. The design and delivery of food assistance should minimize the risk to recipients and contribute to preventing and ending gender-based violence.
- c) States, with the support of the UN system and international assistance and cooperation where appropriate, should ensure access to nutritious food and nutritional support for refugees and asylum seekers in their territory in accordance with their obligations under relevant international legal instruments.

3.6.3 Making food systems resilient

- a) States should develop early warning systems and food and agriculture information systems that are able to detect and monitor threats to livelihoods. These early warning systems should integrate with broader food analysis systems including the monitoring of available and affordable nutritious food at the local level.
- 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.
- c) States should encourage local procurement and the use of local organizations in the implementation of humanitarian food assistance and livelihood programmes to support economic recovery and development, to strengthen sustainable local food systems and to foster the ability of smallholders to access productive resources and markets.

Commented [WBE48]: (BM) Because this section focuses on countries which are either in conflict, experience natural disaster, or in proximity of other countries which are in these situations, it gives the impression that the emphasis is less on asylum seekers and refugees who are in, for instance Europe. Or populations such as the Afghans, who although they do migrate due to the protracted conflict, they are at the same time economic migrants, simply looking for a better life, but nonetheless quite vulnerable in the residence countries.

Thus, a section should be added on migrants in general - including working migrants, who are often vulnerable when it comes to health and nutrition (**Kumar, Diaz, 2019**); perhaps also adding 'irregular migrants' who although they may be illegally in a country, still have basic human rights. Children, unaccompanied minors caught up in all of the above contexts are particularly vulnerable.

PART 4 - IMPLEMENTATION AND MONITORING OF THE USE AND APPLICATION OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION

4.1 POLICY FORMULATION AND IMPLEMENTATION

44-46. 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

Commented [WBE49]: We propose structuring the chapter in three sections for easier reading and for better exposure of two suggested paragraphs on monitoring, where there were none from before. (Also with reference to several comments on this lack at the OEWG meeting 29.01.)

different ministries converge toward the promotion of sustainable food systems that enable sustainable and healthy diets and improve nutrition.

45-47. The VGFSyN should be used to foster dialogue between different actors across sectors, ensuring that all relevant stakeholders, including representatives of the most nutritionally-vulnerable groups, are involved and engaged, and promoting policy coherence while avoiding duplication of efforts.

46-48. The VGFSyN should be used to influence policy discussions within existing regional and national multistakeholder mechanisms, including national councils, as well as the design-development of food and nutrition strategies. Effective actions at cross-sectoral level should be promoted through coordinating mechanisms above individual ministry level.

47-49. 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 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.

48-50. 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 rights 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.

49-51. The VGFSyN should support the implementation of the UN Decade of Action on Nutrition 2016-2025 with the objective to increase the visibility, coordination and effectiveness of nutrition actions at all levels, as key aspects toward the realization of the SDGs by 2030. The implementation of the VGFSyN is expected to contribute to the achievement of the six Global Nutrition Targets (2025) endorsed by the WHA in 2012 and its diet related NCD targets. ²⁷²⁸

50-52. The intention is to support countries in making "SMART" commitments²⁹ and achieving nutrition objectives as well as the creation of informal coalitions of countries as a way to accelerate and align efforts around specific topics linked to one or more action areas of the Nutrition Decade. This can be done through advocating for the establishment of policies and legislation, allowing the exchange of practices and experiences, highlighting successes and lessons learnt, and providing mutual support to accelerate its implementation.

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²⁹ In the context of the UN Decade of Action on Nutrition and ICN2 follow-up process, the next step is to translate the recommended policy options and strategies into country-specific commitments for action. These commitments should be specific, measurable, achievable, relevant and time-bound. https://www.who.int/nutrition/decade-of-action/smart_commitments/en/

Commented [LET50]: It says throughout the document that the VGFSyN provide evidence-based guidance, but it should also be stated that countries have to develop evidence-based policies and explain how to do this. This is the text from the indicator GOVER1 from Food-EPI: **Policies and procedures are implemented for using evidence in the development of food and nutrition policies.**

Commented [WBE51]: this is very general and doesn't say much what kinds of councils are thought of here? Pls. specify

Commented [WBE52]: apostrophy

53. 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.

Commented [LET53]: You could be inspired in the text from one of the Infrastructure domains of Food-EPI: **DOMAIN 9 - GOVERNANCE: Governments have structures in place to ensure transparency and accountability, and encourage broad community participation and inclusion when formulating and implementing policies and actions to create healthy food environments, improve population nutrition, and reduce diet-related inequalities.** And also recommend taking a look at the indicators belonging to the domain.

Commented [LET54]: This is a bit unprecise as I guess it is not expected that UNSCN should implement actions. Suggest revising the text.

4.2 (Suggest added) MONITORING AND EVALUATION OF POLICY IMPLEMENTATION

54. Monitoring of the extent to which relevant policies are being implemented is as important as formulating and adopting them. In principle, measurable indicators should as far as possible be formulated concurrent with the formulation of policies. In line with the CFS Global Strategic Framework a "comprehensive monitoring and accountability strategy for food security and nutrition requires several distinct components, which vary in their objective, approach, and preferred level of implementation."³⁰. Several applicable monitoring systems or models exist, and others may have to be developed. Monitoring should be performed *inter alia* of food environment policies³¹; nutrition-sensitive agricultural programmes³²; food loss and waste policies³³; health-related nutrition policies³⁴; regulatory policies of food safety³⁵; unhealthy food marketing^{36 37 38}; institutional procurement and delivery³⁹; the use of human rights principles in designing rights-based policies⁴⁰ - to mention some.

³⁰ CFS Global Strategic Framework on Food Security and Nutrition, 2017ed. CFS 2017/44/10/Rev.1, p.29.

³¹ Swinburn B, Vandevivere S, Kraak V, et al. Monitoring and benchmarking government policies and actions to improve the healthiness of food environments: a proposed Government Healthy Food Environment Policy Index. *Obes Rev.* 2013;14(Suppl 1):24-37.8.

³² FAO Toolkit on nutrition-sensitive agriculture and food systems, 2014-17, <<http://www.fao.org/nutrition/policies-programmes/toolkit/en/>>

³³ CFS-HLPE Food losses and waste in the context of sustainable food systems, Report no.8, 2014.

³⁴ Gillespie S, Van den Bold, Mara, Stories of change in nutrition. A tool pool. IFPRI Discussion paper 48, 2015.

³⁵ Food Safety Risk Management Evidence-Informed Policies and Decisions. Considering Multiple Factors. FAO Guidance Material, 2017

³⁶ WHO A framework for implementing the set of recommendations on the marketing of foods and non-alcoholic beverages to children, 2012.

https://www.who.int/dietphysicalactivity/framework_marketing_food_to_children/en/

³⁷ UNICEF A Child Rights-Based Approach to Food Marketing: A Guide for Policy Makers, 2018.

https://www.unicef.org/csr/files/A_Child_Rights-Based_Approach_to_Food_Marketing_Report.pdf

³⁸ WCRF (World Cancer Research Fund) Lessons on implementing robust restrictions of food and non-alcoholic beverage marketing to children, 2020. <<https://www.wcrf.org/sites/default/files/PPA-Building-Momentum-3-WEB-3.pdf>>

³⁹ Inst procurement and delivery.... (find appr. Reference...)

⁴⁰ FAO Right to Food Methodological Toolbox, Tool 2 Methods to monitor the human right to adequate food. Vol I: Making the Case for Rights-Focused and Rights-Based Monitoring; Vol II: An Overview of Approaches and Tools, 2009. <<http://www.fao.org/right-to-food/resources/rtf-methodological-toolbox/en/>>

55. Monitoring, or designing indicators for it, can also serve as a means to develop mutual understanding among multi-stakeholders of the different roles of each stakeholder in formulating and implementing a certain policy and evaluate how it has been used and what can be learnt from the findings. Statistical offices can play a vital role where they exist, but many other state agencies and civil society organizations will have their own monitoring systems which should be shared for the benefit of more integrated systems. Academia are often contributors to such systems, or they should engage in strengthening them. Whenever corporations and other enterprises in the private sector take part in multi-stakeholder exercises for public policy formulation, they should include and openly share information on their contribution to multistakeholder undertakings as part of their business due diligence performance.⁴¹

4.3 BUILDING AND STRENGTHENING CAPACITY FOR IMPLEMENTATION

51-54. Efforts should be made to increase the human and institutional capacity of countries to implement the VGFSyN and to identify priorities toward their operationalization at national level. The organization of multistakeholder workshops and training, as well as the development of user-friendly and technical guides, are important to contextualize and adapt the agreed global policy guidance to local contexts. Academic and other research and higher education institutions should be mobilized to contribute actively with updated and new knowledge production and sharing across disciplines and sectors.

Commented [WB55]: Suggest addition: Academic and other research and higher education institutions should be encouraged to contribute actively with updated and new knowledge production and sharing across disciplines and sectors.

55. Parliamentarians and their regional and sub-regional alliances have a key role in designing policies, raising awareness and promoting dialogue among relevant stakeholders, and allocating resources for the implementation of laws and programmes dealing with food systems and nutrition.⁴²

52-56. (Suggest added) States should encourage their national -universities and other research institutions across the various relevant thematic fields to promote - as relevant and feasible with specialized civil society organizations - interdisciplinary research and understanding of the contextual drivers and linkages at play in food systems and nutrition at play at national level. A special task for national researchers implies to build competence in aligning nutrition standards with human rights/right to food and health principles, with a view to underpin policies and programmes with principles of ethical public governance.⁴³

⁴¹ The UN Guiding Principles for Business and Human Rights (2011) emphasizes the responsibility of all businesses to respect the international human rights in all their activities, and perform due diligence of how they comply in this respect also with regard to open sharing of information; this needs further operationalization in the case of the right to adequate food.

⁴² Insert reference to the publications by the Parliamentarian Front against Hunger in Latin America (and similarly evolving in Africa...)

⁴³ Useful guidance to support ~~this~~ such activities in national contexts is available through the rich material developed by the FAO Right to food Unit (later Team) following the FAO Right to Food Guidelines (VGRtAF) of 2004, including the (interactive ref.): FAO Right to Food Methodological Toolbox, follow-up handbooks a.o., see more at <www.fao.org/righttofood> website.

~~53-57.~~ The dissemination and uptake of the VGFSyN ~~should~~may be facilitated through the identification of “champions” ~~that~~who 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.