

Comments on Draft One of the CFS Voluntary Guidelines on Food Systems and Nutrition

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Some general comments on the V1

1. We are pleased with the document and its substantial development since V0. We also appreciate the CFS practice of drawing in all interested stakeholders into the open process, not least recognizing the tremendous work implied for the drafters!
2. The document carries a broad catalogue of what states “should do” to ensure more health-friendly food systems through better access to foods that can facilitate better diet-related health. The emphasis is clear on the threats of climate and conflict and to some extent warning on negative consequences for nutrition and health of some practices of modern food industry, and many other issues. The document advocates “holistic approaches across sectors” as a means to tackle all the challenges. However, there is no fundamental discussion of, or reference to why such approaches - which has been recommended earlier - have so often remained rhetorical rather than led to any real new change in working together, and where to look for reasons for this situation.

In simplified terms, we believe they for a large part are rooted in the common “protection of territory” among ministries and their agencies, and from a comparable situation in most universities and other knowledge producers and educators: these talk highly about the need for interdisciplinary or transdisciplinary research and training, but in the end contradictorily rather reward and support specific competence within the frames of single disciplines. This carries over into the training of both public civil servants and expert advisors who did not get the opportunity to learn about and face “holistic approaches”. We would have welcomed a critical discourse on this in Chapter 4, with some innovative proposals to overcome this impasse. “Champions” alone is not the answer!

3. A special version of clear contradictions in the above when translated to the intergovernmental or UN level appears in para. 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* (our emphasis).”

This reflect among other things, voices repeatedly heard from some Member states in the Rome based food agencies when it comes to discussions e.g. about the right to food as a human right: “Human rights is for Geneva and should not be discussed in Rome”. It is difficult to see how holistic international collaboration to solve pressing global problems in the context of the Agenda 2030 and the SDGs can succeed when Member states express such attitudes (and even reflected in the present guidelines of 2020). Obviously, it can in part be explained by political resistance, but in our experience having followed international negotiations in this field for several decades, it is as much due to incompetence, misunderstandings and lack of support and guidance from historical and administrative memory. The more important is it in the present context that CFS, together with FAO, maintains and utilizes earlier intergovernmental agreements and experiences with human rights perspectives in the food and nutrition field.

4. Regarding the principles on which the document is based, it is explicitly expressed that the guidelines are “Founded upon the principles of the right to adequate food”, para. 37. This carries a responsibility to say something of how this is understood in the informed professional debate and practice. For completeness we firstly suggest added “and other related and relevant rights” since the right to food was not established in a vacuum. We also offer a few, but pertinent formulations in the text to clarify what is meant with the realization of the human right to adequate food. It is important that the document not only uses some relevant “rights” words here and there, but also help avoid common misunderstandings about working towards this right. In Chapter 4 we suggest that States call on their own researchers and training institutions to develop context-relevant studies and recommendations on how to link nutrition standards to principles of human rights in the conduct in policies and interventions. In this they will be able to draw on considerable international and in part nationally generated research and information material already developed on the human right to adequate food, not least by FAO, and gradually also on the right to health which is taking momentum in WHO and UNICEF, and in many professional organizations and actors. We are prepared to provide details.
5. Nutritional conditions and status are broadly impacted by contemporary food systems and environments and related services, people’s dietary behaviour, and health determinants and care services. Sector-wise the document is biased towards the important agricultural sector but would benefit from a sharper focus also on the role of the health sector and its contributions to nutrition, whether good or leaving much to be desired in some contexts. Has the WHO and UNICEF been invited into the drafting team?
6. Special groups including vulnerable groups are discussed in some detail, while some others only very limited. We would have liked to see a structured sub-section according to *the life cycle* pinpointing what are the most sensitive concerns in each phase. By way of example “the elderly” are at various points found listed together with tuberculosis,

handicapped, and pregnant and lactating mothers. Recent research and debate have increasingly unveiled the nutrition sensitivity of elderly in institutions vis a vis inadequate institutional food environments and varying care. This is not at all reflected in the current version of the guidelines.

Another example is youth; while much research is currently going within and outside Europe on the impact on children and youth of many current food environments and health systems, most of what is said in V1 relates to youth in agriculture. Both should be given substantive attention in the final version.

7. In Chapter 4 we have proposed two new paragraphs regarding monitoring and evaluation. While this critical theme appears in the chapter title, it was not dealt with in the text, as also noted by several speakers at the 29.02 OEWG meeting. To make it easier to read we propose to also structure the chapter in three parts. We have inserted reference to relevant monitoring systems or discussion of monitoring with each of a selected number of examples of sub-areas to be monitored within food systems and nutrition. These can of course be replaced with others in the final V1. However, we especially recommend that two references be maintained: the FOOD-EPI system for monitoring food environment policy implementation and the Tool no 2 (in two vols.) of the FAO Methodological Toolbox.
8. On a last general note, we are somewhat disappointed that the V1 does not sufficiently reflect the innovative thinking about nutrition-sensitive agriculture and food system in CFS-HLPE Report no 12 which is said to form the underlying basis of the VGFSyN. It is perhaps a matter of better communicating some of the highlights from that report?