The following comments are made jointly by World Animal Net, Brighter Green, and Pro Veg International.

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

Part 1 / 1.1 / Points 2 and 4
Overweight and obesity, which both increase the risk factor for many diet-related non-communicable diseases, are strongly linked to the overconsumption of animal products. Addressing overweight and obesity requires addressing global meat, dairy, and egg consumption and clearly articulating the root causes of these two serious forms of malnutrition. Without addressing and acknowledging the major causes of obesity and overweight, access to solutions will be limited.

Part 1 / 1.1 / Point 6
The link between animal-product consumption and human health and nutrition and its contribution to malnutrition is overlooked in this First Draft. Among the underlying causes mentioned in Point 6, we strongly suggest adding unsustainable production and consumption patterns, including the overconsumption of products derived from animal sources.

Part 1 / 1.1 / Point 10
Climate change is a growing threat to food security, as acknowledged by the First Draft. Also as stated in the first draft "Climate change, agriculture and nutrition are interconnected." While it is true that climate change negatively impacts agriculture and food security, the First Draft should mention that the agricultural sector, specifically intensive livestock production, exacerbates climate change. This was clearly stated in the recent IPCC Climate and Land report.

Part 1 / 1.1 / Point 11
The First Draft is missing a key opportunity in this section to highlight the overabundance (and overconsumption) of cheap, unhealthy ***animal-sourced products specifically.*** Studies show that meat consumption contributes to global obesity at the exact same extent as sugar[1]. Pointing to the root causes of unhealthy diets will make these guidelines much more effective.

Part 1 / 1.1 / Point 12
The First Draft highlights an important point about excessive consumption and waste patterns. However, it would be more effective to point to the types of overconsumption being referred to, otherwise this point remains too vague to be actionable. The overconsumption of unhealthy, animal-sourced products is clearly one of the main culprits. This point also applies to the section regarding "current global dietary trends." It would be more effective to point to the specific

1 https://bmcnutr.biomedcentral.com/articles/10.1186/s40795-016-0063-9

patterns in global dietary trends that are being referred to. The IPCC report on Climate Change and Lands highlights that "since 1961, the per capita consumption of meat has more than doubled with "food system emissions […] growing globally due to increasing population, income, and demand for animal-sourced products" and "[greenhouse gas] emissions increasing due to greater amounts of animal-based products in diets". Information can be drawn from this important report in order to formulate more actionable points.
In terms of waste patterns, it is also important to highlight the waste incurred through feeding human-edible crops to animals. According to the 2019 Global Sustainable Development Report, the use of human-edible crops as livestock feed is a "non-rational" use of resources[2].
The losses entailed in feeding cereals to animals means that this practice is increasingly being recognized as undermining food security. The UN FAO states that further use of cereals as animal feed could threaten food security by reducing the grain available for human consumption[3]. In fact, the UN Environment Programme estimates that grains - which provide more than adequate nutritional and health benefits to humans - if entirely redirected from feeding livestock towards human consumption, could potentially feed an additional 3.5 billion people worldwide[4]. The UN Development Programme finds that "Most plant matter that animals ingest, including feed, is used up by the animals themselves rather than stored as muscle or fat for consumption by people. The loss [...] has been estimated to be as high as 90 percent, making animals a highly inefficient source of calories for people[5]. For each calorie, the production of animal foods requires much more land and resources than the production of an equivalent amount of plant-based foods."[6]

Part 2 / 2.1 / Point 28

Animals are an important and crucial part of food systems. We suggest adding the word "Animals" to this definition.

Part 2 / 2.1 / Point 30

The EAT-Lancet Commission on Food, Planet, Health, recommends in its seminal report an "increased consumption of plant-based foods – including fruits, vegetables, nuts, seeds and whole grains – while in many settings substantially limiting animal source foods."[7] It also takes into account the importance of considering local and regional realities when considering reducing the consumption of animal products, but clearly states that there is a need to reduce the excessive consumption of such products in wealthier countries.

2 https://sustainabledevelopment.un.org/content/documents/24797GSDR_report_2019.pdf

3 Gerber, P.J., Steinfeld, H., Henderson, B., Mottet, A., Opio, C., Dijkman, J., Falcucci, A. & Tempio, G. 2013. Tackling climate change through livestock – A global assessment of emissions and mitigation opportunities. Food and Agriculture Organization of the United Nations (FAO), Rome. Retrieved from http://www.fao.org/docrep/018/i3437e/i3437e00.htm

4 Nellemann, C., United Nations Environment Programme, & GRID--Arendal. (2009). *The environmental food crisis : The environment's role in averting future food crises : A UNEP rapid response assessment*. Arendal, Norway: UNEP.

5 http://hdr.undp.org/sites/default/files/hdr2019.pdf

6 http://hdr.undp.org/sites/default/files/hdr2019.pdf

7 https://eatforum.org/eat-lancet-commission/eat-lancet-commission-summary-report/

These findings are echoed by the Sustainable Healthy Diets Guiding Principles[8] developed by the Food and Agriculture Organization (FAO) and World Health Organization (WHO)[9] which highlight that "The evidence compiled so far points to the combined health and environmental benefits of shifting towards a more plant-based diet, including vegetables and fruits, nuts, pulses and whole grains."

The Voluntary Guidelines on Food Systems and Nutrition (VGFSyN), can draw from additional points from both these reports and call for an increase in consumption of plant-based foods and a reduction in consumption of animal products where it is excessive, in order to meet health and environmental goals. Although that diets will differ for different national contexts, scientific findings and reports are increasingly showing that diets that are predominantly plant-based and lower in animal sourced foods are more nutritious, better for human health and food security, and more sustainable for the planet.

Part 2 / 2.2 / Point 34.d

Although it is encouraging that this principle mentions the need to protect biodiversity and ecosystems, it would be more comprehensive if it also addressed the need to protect animal welfare. Animal welfare is inextricably linked to animal health, which in turn impacts environmental and human health and well-being[10], particularly through food systems. One Health and One Welfare approaches are increasingly recognized across sectors and by intergovernmental organizations including the Food and Agriculture Organization[11], and the 2016 High Level Panel of Experts on Food Security and Nutrition report "Sustainable agricultural development for food security and nutrition: what roles for livestock?" explicitly recognizes this:

"Animal diseases are a major cause of productivity and economic losses in developing countries. The rapid expansion of the [livestock] sector as well as increased movements of animals and products within countries and across borders make it all the more urgent to address infectious diseases. Even more since the majority of emerging and re-emerging human diseases are zoonotic - they come from animals and are transmitted to humans. The critical linkages between human health, animal health and ecosystems are encompassed in the concept of *One Health*, which highlights the need for collaboration across sectors … Animal welfare is an increasing public concern, raised by consumers and often by retailers who are responding to consumer demand. In many countries, legislation provides for a minimum standard of animal welfare. Where this legislation does not yet exist, the World Organisation for Animal Health (OIE) provides guidelines." [12]

Further, the OIE standards for animal health and welfare referred to have been agreed by the OIE's 182 member countries have agreed to. Animal welfare is a precondition for sustainable food systems and should be included in the guiding principles.

8 http://www.fao.org/3/ca6640en/ca6640en.pdf

9 The WHO and FAO definition of sustainable healthy diets was adapted and used in the First Draft Guidelines.

10 https://www.onewelfareworld.org/

11 http://www.fao.org/policy-support/mechanisms/mechanisms-details/en/c/448751/

12 http://www.fao.org/3/a-i5795e.pdf

Part 3 / 3.1 / 3.1.1 / b

Although it is important to consider the role of the private sector, it is also very important to limit the negative impacts of the private sector on food security and nutrition as well as on the environment. Private sector companies must shift their harmful production practices as well as improve the nutritional quality of the food they offer. This will require States to change their regulatory environments in order to enable this kind of change. Voluntary actions and self-regulation have often been shown to be ineffective without the right regulatory frameworks in place.

Part 3 / 3.2 / 3.2.1

States should also halt any further conversion of any of their lands, including halting deforestation, for intensive livestock production and/or for monoculture crop plantations.

States should also encourage and facilitate the adoption of better animal welfare practices in animal production systems, in accordance with the World Organisation for Animal Health (OIE) animal health and welfare guidelines, as a minimum[13].

States should promote diets that are high in sustainably raised and grown foods, that are predominantly plant-based and low in animal products.

Part 3 / 3.2 / 3.2.2 / b

While supporting and incentivizing smallholders, it is important to highlight that States should also stop incentivizing and supporting the development of intensive livestock agriculture and monoculture plantations, which are harmful to the environment; create social challenges including rural abandonment, poor working conditions and low wages; and unfairly compete with smallholders. These problems are outlined clearly on pages 77-79 of the 2016 HLPE Report "Sustainable agricultural development for food security and nutrition: what roles for livestock?"[14]

Part 3 / 3.2 / 3.2.3 / b

Facilitation also includes implementing high standards of operational animal welfare during production. The various stresses experienced by animals during handling, transport, stunning and pre-slaughter conditions negatively impact the quality of the animal products, often rendering them unusable and unsellable. Better animal welfare minimizes losses of animal sourced foods.

Part 3 / 3.2 / 3.2.3 / e

Specifically, states should impose environmental taxes, and taxes on meat products and other products that are harmful to human and environmental health, as has been proposed by the International Food Policy Research Institute (IFPRI)[15].

Part 3 / 3.2 / 3.2.5

13 https://www.oie.int/fileadmin/Home/eng/Animal_Welfare/docs/pdf/Others/EN_OIE_AW_Strategy.pdf

14 http://www.fao.org/3/a-i5795e.pdf

15 https://www.ifpri.org/blog/taxing-red-meat-may-cut-emissions-and-disease

In this section, it is important to note that industrial agriculture is a high-input, low-labor system, meaning loss of agricultural jobs, which are the mainstay of developing country economies – whereas small-scale, high welfare, agroecological production provides local food security and labor opportunities. Such small-scale systems, when well-managed, can produce development opportunities for rural populations, including youth and women. Good animal welfare is an important part of good management. It includes improved healthcare and nutrition for the animals through better disease prevention and management, which results in increased livestock productivity and quality. This improves smallholders' purchasing power, making them better able to buy the food that they do not produce, further supporting food security. It is very important to highlight in this section (and wherever relevant), the importance of incorporating better animal welfare standards in all production systems that are dependent on animals.

Part 3 / 3.2 / 3.2.6

Although prioritizing climate change adaptation and mitigation is certainly important, it is vital to adopt a proactive approach to the climate crisis, by addressing some of the root causes and drivers of climate change. Not only is climate change hindering people's ability to produce and consume food, climate change in itself is being exacerbated by industrial animal agriculture, which produces 14.5%[16] of global greenhouse gas emissions, creating a destructive loop of unsustainable production and consumption that contributes to food insecurity. The Intergovernmental Panel on Climate Change (IPCC) report on Climate Change and Lands states that a large-scale shift towards plant-based diets presents an opportunity for climate change mitigation and adaptation. This type of solution should be highlighted as an additional, crucial point in this section.

Part 3 / 3.2 / 3.2.6 / d

This point should specifically mention the need to invest in small-scale, **high-welfare** "animal production systems".

Part 3 / 3.2 / 3.2.8

Food safety in animal food production systems is simply inseparable from animal health, which is inherently tied to animal welfare. We agree that "States should implement, internationally adopted standards at the national level." These should include, as a minimum, the international animal welfare standards established by the World Organisation for Animal Health (OIE), which have been agreed upon by all 182 member States of the OIE. As stated by the OIE, "animal welfare is closely linked to animal health, the health and well-being of people, and the sustainability of socio-economic and ecological systems" and "In food production systems, attention to animal welfare can improve productivity, quality, food safety, and economic returns, and therefore contribute to food security and economic prosperity."[17]

The VGFSyN present an important opportunity to offer tangible and realistic solutions, such as accounting for animal welfare, that can improve the livelihoods and health of millions of people.

Part 3 / 3.3 / 3.2.8 / d

In regards to global antimicrobial resistance (AMR) it is important to reference the internationally recognized OIE animal health and welfare standards when considering measures

16 http://www.fao.org/news/story/en/item/197623/icode/

17 https://www.oie.int/fileadmin/Home/eng/Animal_Welfare/docs/pdf/Others/EN_OIE_AW_Strategy.pdf

to recommend in order to improve food safety. The current practice of using antibiotics on farms prophylactically has been linked to antimicrobial resistance, and recommendations to curb the prophylactic use of antibiotics include increasing natural immunity through better housing conditions, improved animal welfare, and more hygienic practices. Small-scale agroecological systems that respect animal welfare provide animals with the ability to express their natural behaviors, do not expose them to the stresses of overcrowding and large group sizes, and strengthen animals' natural immunity without requiring medication[18].

Part 3 / 3.3 / 3.3.2

Promote sustainably raised and grown foods, including sustainably produced plant-based meals in public institutions, such as schools, hospitals, universities and government offices.

Part 3 / 3.3 / 3.3.3

Subsidies and incentives for food production systems that are unsustainable, polluting, and produce foods that are harmful to human health should be completely eliminated. This section should clearly highlight what "less nutritious foods" are. Based on the Guiding Principles for Sustainable Healthy Diets by the WHO and the FAO: "The evidence compiled so far points to the combined health and environmental benefits of shifting towards a more plant-based diet, including vegetables and fruits, nuts, pulses and whole grains" and "Studies of food and health relationships have consistently highlighted associations between low intakes of plant-based foods as well as high intakes of animal products and ultra-processed foods, and poor health outcomes."[19] Since the VGFSyN already adopt the definition of "Sustainable Healthy Diets" that is used in guidelines produced by the FAO and WHO in their guidelines quoted above, there is room for the VGFSyN to also expand on what constitutes a nutritious and healthy diet and to mention the importance of shifting to (or maintaining) predominantly plant-based diets.

Part 3 / 3.4 / 3.3.4.2 / k

Suggest changing the end of this point to: "Promoting nutrition education and the benefits of ***predominantly plant-based*** healthy diets"

[18] CIWF. Agroecology- Ecologically-smart farming. Retrieved from https://www.ciwf.org.uk/media/7428908/agroecology-ecologically-smart-farming.pdf

[19] http://www.fao.org/3/ca6640en/ca6640en.pdf