

## Germany

Dear colleagues,

We would like to submit the following comment on the HLPE Report as it's also important for the drafting process:

- 1) In view of the statements regarding ultra-processed foods (pages xxii, 72), we would like to point out that there is no internationally agreed definition for “ultra-processed foods” and that there is insufficient evidence/controversy on whether the degree of processing or other factors such as energy density, sugar, fat and salt levels, are responsible for the negative health effects of consuming ultra-processed foods determined in observation studies. A more differentiated approach should be taken when considering measures that impact the sale and/or promotion of ultra-processed foods.

Also, we would like to point out again that we consider the term “unhealthy foods” (page 72) inappropriate as healthy diets can comprise a variety of foods including limited quantities of e.g. ultra-processed foods such as sweets.”

- 2) Genetic diversity is an essential building block for resilient food systems. Therefore, activities for the conservation and promotion of genetic resources for sustainable agriculture, forestry and fisheries are needed.

Policy recommendations on national level:

- \* The conservation of a broad diversity of genetic resources for food and agriculture is secured in the long term and ex situ and in situ conservation measures complement each other adequately
- \* Genetic resources are part of a diversified, sustainable and resilient agriculture, forestry, fisheries and food sector
- \* Endangered domestic genetic resources as well as underutilised crops and livestock breeds are valorised
- \* Monitoring of the occurrence and sustainable use of genetic resources for food and agriculture takes place and allows conclusions to be drawn about the respective endangerment status