

Hungarian comments on the Zero Draft of the Voluntary Guidelines on Food Systems and Nutrition

These comments are intended to complement the Hungarian written submission on the 22nd of March 2019 and reiterate the comments made orally at the OEWG meeting on 30th of May.

We wish to highlight the following.

- We consider desirable that the Voluntary Guidelines will be applicable and usable in practice, providing real help to Member States in their efforts to improve the nutritional status of their population. It is also important to provide real help to consumers and all relevant stakeholders to improve their own diets and healthy dietary choices. In this respect we feel that the importance of improved nutrition literacy among all stakeholders is not sufficiently reflected in the guidelines.
- The chapter on Definitions is essential for the clarity and coherence of the document, but some of the definitions would require further refining. We wish to strengthen the need for reference to a **sustainable diet**. Even if the definition itself is considered controversial, we think it is important to include the concept of sustainability among the drivers of people's choice of a healthy or unhealthy diets. Therefore, we suggest to use the terminology of sustainable diet, in line with the HLPE report. The definition proposed by FAO in 2010 could be a generally accepted definition.
- The need to link sustainability to healthy diets is also in line with SDG12 (sustainable production and consumption). For this reason we request the inclusion of «and sustainable diet» wherever the term «healthy diets» is used and not yet linked to sustainability. We think it should be an overarching principle that prevails in every chapters. It would also be necessary to take all the 3 (economic, environmental and social) dimensions of sustainability in consideration and also the interlinkages and a desirable balance among them.
- We wish to underline once again the need for **true cost accounting**. It is essential to give due consideration to all positive and negative impacts of the various food systems on the environment and on the human health. If these so-called externalities are clearly demonstrated, we will be better positioned to recommend in the Voluntary Guidelines the appropriate measures, policy incentives in support of the sustainable solutions. In this regard, it would be advisable to consider the existing scientific evidence related to the true costs of food (for example FAO paper on true cost accounting: <http://www.fao.org/family-farming/detail/en/c/436356/>; TEEB Agrifood <http://teebweb.org/agrifood/measuring-what-matters-in-agriculture-and-food-systems/> and many others).
- The issue of food losses and waste (FLW) is mentioned in the document in the chapter on Storage and distribution. However, we consider it important that the drivers of FLW are carefully identified in order to propose appropriate measures to tackle this serious economic and social problem. **One of the drivers of food waste is the artificially low prices of food, which are regularly low quality food products. These artificially low food prices are the direct consequences of the distorted food systems where the**

indirect or hidden costs of unsustainable food production are not reflected in the prices. See previous paragraph calling for applying the true cost accounting.

- We wish to highlight again that as far as food **fortification** is concerned, it **should be considered only as a temporary solution in specific, fragile contexts** and not as a final goal. The real solution should be the consumption of diverse, locally produced, nutritious food for a healthier diet, benefitting also the local communities who produce these food products. These products contain all nutrients, minerals, vitamins for a healthy diet; therefore, on the longer run there is no need for fortification. This should be made clear while shaping the Voluntary Guidelines.
- In the paragraphs 1 to 12 the Zero Draft provides a good background on the multiplicity nature and the various aspects of malnutrition, including undernutrition and obesity as well. What **we miss** from this part is a reference to **the root causes of malnutrition: poverty and inequalities**, including but not limited to gender inequalities.
- In Paragraph 12 we propose to include “**environment**” among the sectors listed.
- Throughout the document the term “food systems” is rightly used, but we miss it from the second sentence of paragraph 15. This should read: “...Nutrition **and food systems** have received increased attention...”, in line with the agreed language of the recommendation adopted by the last session of COAG.
- In paragraph 24. we propose adding the following (highlighted in **yellow**): The HLPE has identified five main categories and related drivers which impact the functionality of food systems and their **impacts on nutrition and their** ability to deliver healthy diets. These categories **will be duly taken into account while shaping the VGs and** are the **following**:
 - In the same paragraph 24 among the five main categories “poverty and inequalities” should be included under the socio-cultural drivers:
 - d) socio-cultural (culture, religion, rituals, social traditions, **poverty and inequalities, including** gender inequalities and women’s empowerment);
- In paragraph 43.a): we suggest inclusion of the following: ‘adopting agroecological approaches and other innovations for sustainable agriculture and food systems’

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