

**CSM Comments on Draft for Negotiations on Food Systems for Nutrition (June 2020)**

*This document conveys the comments of the Civil Society and Indigenous Peoples' Mechanism (CSM). This document conveys the collective comments of the broad array of civil society constituencies that actively participate in the CSM/CFS process.*

**OVERARCHING COMMENTS**

1. We have chosen to include comments rather than revisions because we believe the structure of the sections and the formulation of many of the paragraphs requires significant re-adjustment along the lines we have suggested, including new paragraphs that are currently missing;
2. We reserve the right to make further comments as the dialogue with Member States resumes, including in areas we have not currently commented on. The negotiations are a process of dialogue and position building, hence our continued perplexity with this way of proceeding;
3. We believe that the COVID crisis has exposed deep structural challenges which need to be reflected across the entire document and within each of its sections. However, the crisis continues to unfold, and it is therefore difficult to learn lessons at this early stage without experiencing the evolution of the situation;
4. We believe that Part IV of the Guidelines should be further developed. The CSM is still consulting internally regarding this section and will submit the respective inputs at a later stage of the process.

## Draft for Negotiations

CSM requests for the title to be maintained as “CFS Voluntary Guidelines on Food Systems and Nutrition”, as this was the mandate for the OEWG on nutrition and was endorsed by the Committee during CFS 45.<sup>1</sup>

The CSM believes that the change of title will narrow the scope of the guidelines, suggesting that food systems should only serve nutritional outcomes. This approach undermines the holistic and systemic approach envisioned by the process, while also ignoring the multiple public objectives food systems can serve, from health to livelihoods, from ecology to cultural heritage, from social to knowledge systems.

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<sup>1</sup> “Mandated the OEWG on nutrition, [...] terms of reference for the policy convergence process leading to voluntary guidelines for food systems and nutrition for submission to Plenary in CFS 45” CFS 44 Final Report, paragraph 19.c - <http://www.fao.org/3/a-mv030e.pdf> & “Endorses the Terms of Reference for the preparation of the CFS Voluntary Guidelines on Food Systems and Nutrition, in support to the UN Decade of Action on Nutrition 2016- 2025” CFS 45 Drafty Decision on Workstream on Food Systems and Nutrition - <http://www.fao.org/3/mx515en/mx515en.pdf>

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## PART 1 - INTRODUCTION

We are today at the cross-roads of a crisis of inestimable proportions, which will impose its heaviest tolls on the most marginalized. COVID-19 has exposed the deep inter-connections between health, economy, agriculture, food and livelihoods. The pandemic amplified the fragility and inadequacy of global value chains to address such inter-connections and has made clear the urgent need for locally rooted food systems. No progress can be achieved in nutrition if all these dimensions are not addressed through a profound transformation of food systems, one that moves beyond the exclusively productivist drivers that dominated agricultural policies over the past decades.

The Introduction should be the “opening statement” and rationale behind the need of transformation of food systems through a systemic approach. The latter should highlight an in-depth analysis of the root causes of malnutrition and environmental collapse, and their interconnections within our current food systems.

The preamble of a document with such relevance should serve as a “wake-up” call for decision-makers to follow guidance to address the unacceptable rise of malnourished people, but also ensure that future food systems do not continue to destroy our environment the way the current ones are so relentlessly doing.

## 1.1 BACKGROUND AND RATIONALE

This section should trigger the real and urgent need to transform our food systems. Therefore, it should recognize that the current hegemonic food system with an agro-industrial production model is not only unable to respond to the existing malnutrition problems but have also contributed to the creation of different forms of malnutrition and the decrease of the diversity and quality of our food and diets, the environmental destruction and climate crisis, and the health emergency that we are witnessing. In this regard, it has become clear that the structural drivers of zoonotic infectious diseases such as SARS Cov-2 are an elementary part of current food systems as they are closely related to industrial agriculture and livestock breeding. The expansion of agriculture has led and leads to high rates of deforestation and the reduction of biodiversity, thus reducing the resilience of ecosystems. Although we see references to some of these elements in this first section, they appear to be fragmented and analysed only at their surface. From paragraph 1 until paragraph 13 a sequential analysis of the root causes of malnutrition and failures of the current food systems to:

- ensure the right to adequate food for all with all its interrelated and indivisible rights and
- protect the environment with its related ecosystems needs to be done.

The comments on the content and depth of the analysis that should be undertaken by the guidelines can be found on the respective paragraphs. However, it is crucial to strengthen the interrelations of the points in order to have a holistic understanding of how today’s prevalent unhealthy and unsustainable diets are just the result of a failure in the system to provide and prioritize food that is equitable, just and produced in respect of the ecosystem and people living within it.

Such an analysis should therefore strengthen successive paragraphs (13 until 19) to include which are the fundamental changes needed to transform food systems. This could also be the place to include the rationale for the need to have assessment of food systems in all their dimensions (ecological, social, health, economic...). The assessment would be a concept tightly linked to the guiding principles of the guidelines.

More in particular, reshaping of food systems must focus on how to achieve sustainable healthy diets for all. The background and rationale should expose how nutrition is foundational for personal development as well as for a harmonic collective relationship with nature. It should give a comprehensive understanding to the food-ecological-social-health nexus and re-consider nutrition as a critical space of systemic convergence and coherence across different policy domains – this was a clear demand throughout all the Regional Consultations. The systemic approach, one that explores the interconnections between ecology, agriculture, food, and human health, which has been requested by so many CFS members and participants (including the CSM) throughout the whole process must be central throughout the document. Re-positioning food in nature is of paramount importance for people’s health and well-being while at the same time ensuring a regenerative use of natural resources and ecosystems.

This section should pave the way towards critical issues which could be underpinned in the key concepts and that should overarch the totality of the Voluntary Guidelines (guiding principles). These include:

- Centrality of people, in particular small-scale food producers and women, and their agency in shaping food systems and dietary outcomes. The primary focus should be on the people most affected by malnutrition in all its forms so as to overcome the challenges they face;
- Reshaping food systems is to be centrally based on and contribute to the realization of the right to adequate food. This requires systemic rather than sectoral changes, and overall policy coherence with the right to food. It also requires a focus on the basic and root causes of malnutrition, and on the groups most affected; as well as on new determinants such as the climate crisis and dematerialization of food;
- Transformation must contribute to the realization of human rights overall, given their indivisibility and interrelatedness
- Definition of healthy and sustainable diets from Draft one. This key concept should be the basis of guidance to ensure that diets are affordable, balanced and varied, and provide the nutrients required to live a healthy and active life for both present and future generations. Sustainable food systems should be able to provide sustainable healthy diets. If the understanding of food as the locus of nexuses between social, economic, health, environmental and labour dimensions is achieved, then the concept of sustainable healthy diets for all should be the immediate outcome of food systems which are both sustainable and equitable.
- Healthy diets require a healthy planet

1. **Malnutrition in all its forms** – undernutrition, micronutrient deficiencies, overweight, and obesity – is one of the major challenges that countries face and is a result of food insecurity<sup>2</sup>, along with many other factors and causes. Malnutrition, in at least one of its forms, affects every country in the world and most countries are affected by multiple forms. The impacts of malnutrition have profound consequences on people’s health and wellbeing, physical and cognitive development, and livelihoods throughout their lifetime and across generations. Malnutrition is a major impediment to the progressive realization of the right to adequate food in the context of national food security and the implementation of the 2030 Agenda for Sustainable Development.

The problematic of persistent and rising hunger is not mentioned. Explicit references to hunger should be included. More than 820 million people in the world are still hungry today (FAO, IFAD, UNICEF, WFP and WHO. 2019. The State of Food Security and Nutrition in the World 2019. Safeguarding against economic slowdowns and downturns. Rome, FAO. (<http://www.fao.org/3/ca5162en/ca5162en.pdf>)

Hunger is therefore a problem relevant enough to be spelled out in the document and not "camouflaged" in the terminology of malnutrition.

2. Malnutrition in all its forms is associated with various forms of ill health and increased mortality. **Undernutrition** is a major cause of death among children under the age of five years, increases the

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<sup>2</sup> "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". FAO, 1996. Rome Declaration on World Food Security and World Food Summit Plan of Action.

susceptibility to infectious diseases and risk of non-communicable diseases (NCDs) in adulthood. Wasting, also known as acute malnutrition, poses a significant risk of increased morbidity and mortality in children. Stunting, also known as chronic malnutrition, is associated with delays in both physical growth and cognitive development.

In the actual situation, it becomes clear that malnutrition and poor diets are also contributing factors to underlying health conditions that have aggravated the death toll amongst those infected with COVID-19 (this should be also connected to paragraph 5, see comment in respective section).

It should be added that the use of pesticides across the food systems has a direct impact on the health of agricultural workers as well as end consumers, whose immune systems have been compromised.

The sense of urgency has been lost from the previous draft and should be re-included.

3. **Micronutrient deficiencies** related to the inadequate intake of food rich in iron, vitamin A, iodine, folate, vitamin D, and zinc, among others, affect a large proportion of the global population with serious consequences on health, well-being, and development. Children under the age of five years, adolescent girls, women of childbearing age, and pregnant and lactating women have specific nutritional requirements across their lifecycle and are susceptible to a higher risk of anaemia, in particular iron deficiency anaemia. Also referred to as “hidden hunger,” micronutrient deficiencies increase a person’s vulnerability to infection, birth defects, impaired development, and lower life expectancy.

A holistic approach of food systems takes into account that diverse diets composed of fresh, seasonal and unprocessed/minimally processed food should be the ones providing for the nutrients to live an healthy and active life. See comment on section 1.1

4. **Overweight and obesity** represent major risk factors globally for diet-related NCDs such as some forms of cancer, cardiovascular disease, and diabetes. While undernutrition and micronutrient deficiencies are still the main forms of malnutrition among children under the age of five years globally, overweight and obesity are increasingly prevalent among young and school-aged children, adolescents and adults.

Obesity also affects children including under 5’s, school aged children and adolescents; especially those in low- and middle-income countries where the disease is rising fastest. World Obesity’s 2019 Global Atlas on Childhood Obesity found worrying trends in the predicted data if urgent actions in food systems and beyond are not taken.

5. The heavy **social and economic impacts of malnutrition in all its forms** are transmitted across generations. Undernourished mothers are more likely to have low-birth-weight babies putting them at an increased risk of becoming undernourished as children into adulthood as well as overweight and obese as adults. Maternal obesity poses short- and long-term risks for maternal and child health including poor cognition and increased risk of neurodevelopment disorders early in life, as well as an increased susceptibility to obesity and NCDs in adult life. Malnutrition in children results in reduced stature, diminished physical and mental health, poor school performance, reduced economic

productivity and opportunities, and increased vulnerability to NCDs and other chronic diseases. These diseases lead to early death and increased morbidity and disability and require higher spending on health care, placing significant burdens on national health care systems and economies.

Malnutrition is contributing to pre-existing conditions that put people more at risk to illnesses, such as COVID is demonstrating. Malnutrition in itself not only poses heavy social and economic impacts but also health risks. COVID pandemic has exposed the need to have public health at the center. This should be therefore reflected in nutrition and food systems; public interest must be at the heart of these dialogues. Sustainable healthy diets are to become also a public issue in order to address malnutrition and consequently reduce health impacts.

Moreover, this section should also touch upon the social impacts by current food systems and modes of productions. The concept of assessment (see comment on background and rationale) should be central here. Linkages should be established between this paragraph and paragraphs 7, 8, 9 and 10 by mentioning the need for evaluation on how current food systems and industrial modes of production impact on health (malnutrition has been on the rise for the past few years, linkages between intensive production systems and rise of epidemics' risk<sup>3</sup> and AMR), environment, societies and livelihoods.

See comment on next paragraph.

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 safe food and healthy diets, inadequate infant and young child-caring and feeding practices, poor sanitation, hygiene and safe drinking water, insufficient access to quality education and health services, low socioeconomic status, and marginalization. Basic causes of poor nutrition encompass the societal structures and processes that slow down the realization of human rights and perpetuate poverty, limiting or denying the access of vulnerable populations to essential resources for achieving optimal nutrition and health.

Points 5 and 6 should be the space to recognize that malnutrition is essentially the result of an imbalance between ecosystems and human-led forces.

Results of such an imbalance are the dramatic rise in the number of people affected by NCDs and the deep devastation of biodiversity, leading not only to the decrease of diversity within our diets, but also the possibility for micro-organisms to spread easily from one specie to another and thus generating new forms of human diseases, namely zoonosis such as COVID-19. Worth mentioning is the phenomenon of "inversed resilience", which refers to the adaptation towards the auto-destruction of a species as a response.

This also concerns point 10.

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<sup>3</sup> "Overuse of antibiotics, high animal numbers and low genetic diversity caused by intensive farming techniques increase the likelihood of pathogens becoming a major public health risk". University of Sheffield and University of Bath – Intensive farming increases risk of epidemics, warn scientists. 5 May 2020

7. **Poverty and inequality** are important underlying causes of hunger and malnutrition in all its forms. Low employment rates, wages, incomes, and purchasing power have negative consequences on nutrition and health outcomes. Negative economic trends limit the capacity of national governments to deliver essential social services and health care to their citizens. In this context, inequality in income and asset distribution as well as in access to nutrition-relevant services contributes to marginalization and social exclusion, and further increases vulnerability to malnutrition.

8. **Those most affected by malnutrition in all its forms** typically include people with increased nutrient requirements and those who have less control over their dietary choices, including young and school-aged children, adolescents, pregnant and lactating women, the elderly, and people with disabilities. In addition, Indigenous Peoples, peasants, urban and rural poor, agriculture workers, upland and remote communities, migrants, refugees and displaced people are particularly vulnerable to malnutrition because of their persistent or temporary poverty.

**Include all workers of the value chain, not only agricultural workers.**

9. **Complex and protracted crises**<sup>4</sup> also have short, medium 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 climate-related disasters pose a major threat to the ability of food systems to deliver healthy diets and to the implementation of the 2030 Agenda for Sustainable Development as a whole.

10. **Climate change, agriculture**<sup>5</sup>, **and nutrition are interconnected.** Climate change 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 also impacts food quantity, quality, safety and ultimately food prices, with significant implications for the availability of healthy diets. At the same time, agriculture and food production are major contributors to greenhouse gas emissions and account for large portions of the planet's land and fresh-water use.

**In paragraph 9 and 10, we must also use this historic opportunity to speak about how to build food systems that are resilient in the face of not just climate change, but also continuous pandemics as well as economic and financial crisis. We must remember that the COVID-19 pandemic has not hit us out of the blue. The last three decades have delivered us sufficient warnings. Our food systems have been the source of many new diseases. Just a few of them, namely mad cow disease, swine flu, avian flu, were able to wipe away millions of animals from our food supplies. Many of these were also able to make the transition from animal to human. We got lucky before, but the current pandemic shows that this luck has run out. It is important that the guidelines not only reflect the perils of how agro-industrial meat processing posits a major risk to our health, but how the depletion of soils through the use of pesticides**

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<sup>4</sup> Protracted crisis situations are “characterized by recurrent natural disasters and/or conflict, longevity of food crises, breakdown of livelihoods and insufficient institutional capacity to react to crises”. [2010 State of Food Insecurity in the World Report](#). FAO. 2010

<sup>5</sup> Agriculture includes crops, forestry, fisheries, livestock and aquaculture. [UNGA Resolution A/RES/74/242](#) .Paragraph 20



and herbicides pose a risk from soil-based diseases. This is why it is important to insist on moving towards sustainable food systems.

Furthermore, the notion of climate change should shift towards collapse, crisis or breakdown. The category of "change" naturalizes the problem and constructs it as a passing notion.

11. **Unhealthy diets** have become a major risk factor of multiple forms of malnutrition and health outcomes globally. Global dietary patterns have been changing, affecting people across all parts of the world. In many regions of the world, dietary changes are shifting towards the consumption of convenient food and beverages with high content in sugar and/or in saturated fat, salt which are associated with an increased prevalence of overweight, obesity and NCDs. Profound dietary changes are occurring for several reasons, including the movement of people to urban places, the influence of globalization and trade within the food system, the continued loss of access to traditional diets, and changing lifestyles.

The document should not talk about "global dietary patterns" as it unifies rather than diversifies the multiplicity of contexts that might exist around the world. To ensure the plurality of healthy and sustainable diets, which takes into account the local diversity of fresh and unprocessed food it should be recognized that "dietary patterns have been changing globally leading to an unhealthy unified pattern". In this regards it is important to mention that food systems have become more interconnected from global to local levels, with longer and more complex food supply chains. COVID-19 is currently exposing such complexities.

12. **Food systems**<sup>6</sup> are complex webs of activities and actors involving the production, processing, handling, preparation, storage, distribution, consumption and ultimately waste of food. They are constantly being shaped by different forces, drivers and decisions by many different individuals. Every food system has the capacity to be equitable and to produce healthy diets needed for optimal nutrition. But, they can also be shaped by power concentration and imbalances, which may not be inclusive and equitable. Some food systems are sustainable while others show their limits in terms of sustainability and inefficiency in natural resource utilization, and in the use of labour and energy, leading to environmental degradation, water pollution, and loss of biodiversity as well as to excessive food consumption and food waste patterns.

The definition of food systems should be more prominent, and not only addressed in a footnote. The Voluntary Guidelines provide the unique opportunity to explicit the concept of food systems under a holistic approach. The importance and scope of such document should be to move beyond the simplistic and linear perspective of production-consumption of food, but rather to underpin all the multiple objectives that food systems can serve. We believe, therefore, that paragraph 12 is of extreme relevance to present such purpose in order for the guidelines themselves (part 3) provide guidance on

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<sup>6</sup> "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". 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.

how to address the linkages of food systems for health, environmental, social, economic and cultural objectives to be met by governments while putting the public interest at the center.

However, we still see food systems being defined as mechanisms of the production and distribution of food. The approach taken continues to see the crisis of hunger and malnutrition as fixable through making the right consumer choices. Food systems do not just deliver food to the market for consumers to purchase, for example they also provide employment to millions in each of our countries. When they do not work, they expel millions to seek employment elsewhere – or condemn them to joblessness. This is what the COVID-19 crisis has shown us as millions of workers have begun long and tedious journeys back into their home villages, where they no longer have access to land due to historical trajectories of how the current agro-industrial food system has developed.

Food systems are essential, not just for feeding us healthy food, but for the health of the most vulnerable members of our species and our vulnerable planet. These guidelines are our opportunity to show that we are up for the challenges that face us.

The problem of the increasingly dominant industrialized food system as well as the role of food imports are not addressed. Here again a strong link should be made with paragraph 11 and the recognition that globalization and trade within food systems are major drivers for unhealthy diets. Include reference again that the ‘current global food systems, with their excessive consumption and waste patterns are unsustainable’, making emphasis in the need for social justice.

The statement *“Every food system has the capacity to be equitable and to produce healthy diets needed for optimal nutrition. But, they can also be shaped by power concentration and imbalances, which may not be inclusive and equitable”* is misleading and contradictory. While it mentions food systems that are characterized by power concentration, imbalances, non-inclusiveness and injustice, it also acknowledges that all food systems have the capacity to be equitable and to produce healthy diets. However, this section should recognize that due to power imbalances, not all food systems have the capacity to be equitable and provide healthy and sustainable diets.

Namely, the industrialized food systems are not equitable on principle as they rely on their profitable interest outside the basis of food sovereignty.

Finally, while addressing sustainability, it is necessary to prioritize systems that are not only environmentally sustainable, but which are also culturally appropriate, equitable and contribute to the progressive realization to the Right to Food and Nutrition, such as agroecology.

13. The **functionality of food systems** and their ability to deliver 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 policies, but also across multiple sectors and policy areas that address, for example, national development priorities, economic policies, and social norms<sup>7</sup>.

It is necessary to clearly state that the objective is to achieve sustainable food systems through their capabilities to produce and provide for sustainable healthy diets for all. The right to food should be a core element within this paragraph as “functional” food systems will only be those who are able to fulfill the right to adequate food and nutrition for all.

14. Transforming food systems and promoting sustainable food systems<sup>8</sup> that meet the dietary needs of populations require **institutional and behavioural changes** among all food system actors. Food system-related policies need to focus on their economic, social, environmental, cultural, nutritional, and health consequences, paying special attention to the poorest and most vulnerable to malnutrition and addressing barriers they face in accessing food for healthy diets.

The document lacks guidance on the definition of sustainable food systems. We disagree with the equal footing to “transforming food systems” and “promoting sustainable food systems”. This suggests that not all food systems need to be transformed, but without explaining what would be considered a sustainable food system. The document should recognize that the same systems that cause malnutrition in all its forms also impact on climate crisis, biodiversity and planetary health overall and thus have to be transformed. This is all the more critical as point 2.3. now reads 'Transforming food systems OR promoting sustainable food systems'.

We re-iterate the importance of developing a holistic approach while addressing sustainability. One that addresses environmental sustainability, but also health, social justice, equity and cultural respect.

15. **Changes in governance** are needed within and across food systems, and its constituent elements, namely food supply chains<sup>9</sup>, food environments<sup>10</sup>, consumer behaviour<sup>11</sup> to generate positive outcomes along the three dimensions of sustainability – social, economic, and environmental.

16. **Coordination processes** are required to address **policy fragmentation** across sectors such as health, agriculture, education, environment, water, sanitation, gender, social protection, trade, employment, and finance – all of which impact nutrition outcomes.

17. The Committee on World Food Security (CFS) has undertaken a policy process to produce **Voluntary Guidelines on Food Systems for Nutrition (VGFSyN)**. The preparation of the VGFSyN is informed by the findings and scientific evidence provided in the [High Level Panel of Experts on Food](#)

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<sup>7</sup> HLPE. 2017. [Nutrition and food systems](#). A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security.

<sup>8</sup> “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”. HLPE 2014a

<sup>9</sup> 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

<sup>10</sup> Food environments “refer to the physical, economic, political and socio-cultural context in which consumers engage with the food systems to make their decisions about acquiring, preparing and consuming food.” HLPE 2017b

<sup>11</sup> 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

[Security and Nutrition's \(HLPE\)<sup>12</sup> Report on Nutrition and Food Systems](#), additional literature as well as a consultation process that took place between May and November 2019 which involved the participation of CFS stakeholders in meetings in Italy, Ethiopia, Thailand, Hungary, Egypt, Panama, and the United States of America, as well as through an electronic consultation.

18. 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 are recognized as essential co-determinants for 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 forms<sup>13</sup>. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025)<sup>14</sup> 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 the CFS. In 2017, the UNGA proclaimed the United Nations Decade of Family Farming (2019-2028)<sup>15</sup>. Specific attention to nutrition has been given by a number of UNGA Resolutions<sup>16</sup>, the UN Economic and Social Council (ECOSOC)<sup>17</sup>, the UN Environment Assembly<sup>18</sup>, the World Health Assembly (WHA)<sup>19</sup> and the UN Special Rapporteur on the Right to Food<sup>20</sup>.

19. The VGFSyN are expected to contribute to and complement these international initiatives with a view to **promoting policy coherence**. They provide evidence-based guidance to help countries operationalize ICN2's Framework for Action<sup>21</sup> recommendations in support of the progressive realization of the right to adequate food in the context of national food security and of the right to health, and of the achievement of Sustainable Development Goal (SDG) 2<sup>22</sup>, with particular attention to targets 2.1<sup>23</sup>,

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<sup>12</sup> 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.

<sup>13</sup> FAO/WHO. 2014. ICN2, [Rome Declaration on Nutrition](#).

<sup>14</sup> UNGA Resolution [A/RES/70/259](#) - The [Work Programme of the UN Decade of Action on Nutrition](#)

<sup>15</sup> [UNGA Resolution A/RES/72/239](#).

<sup>16</sup> UNGA Resolutions [A/RES/73/2](#), [A/RES/73/132](#), and [A/RES/73/253](#).

<sup>17</sup> [Ministerial Declaration of the 2018 High-Level Political Forum on Sustainable Development](#)

<sup>18</sup> [Ministerial Declaration of the 2019 United Nations Environment Assembly](#)

<sup>19</sup> 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.

<sup>20</sup> [A/71/282 "Interim report of the Special Rapporteur on the right to food"](#)

<sup>21</sup> FAO/WHO. 2014. ICN2, [Framework for Action](#).

<sup>22</sup> SDG 2, "*End hunger, achieve food security and improved nutrition and promote sustainable agriculture*".

<sup>23</sup> 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*".

2.2<sup>24</sup> and 2.4<sup>25</sup>. In addition, the VGFSyN should play an essential role in assisting countries to achieve other related SDGs (SDG 1, 3, 4, 5, 6, 8, 10, 12).

## 1.2 KEY CONCEPTS

The understanding of diets has to be deepened. Diets are the core pillar of the policy convergence. Diets are not only about what is eaten, but how, where and with whom food is consumed, not only today but tomorrow, and the ecological, social and economic implications of which food is consumed, by whom, in what conditions/circumstances. Diets are therefore profoundly relational concepts as they express our social contract with our producers and workers, with our land and territories, with our ancestors and our future generations, with the health of our communities, and the strength of our democracies and economic systems. Diets are the cornerstone of our systemic response to the multiple crises we are confronted with. They are sub-systems for individual and collective decisions, as unhealthy and unsustainable dietary choices have deep societal consequences.

20. **Healthy diets** are those diets that are of adequate quantity and quality to achieve optimal growth and development of all individuals and support functioning and physical, mental and social wellbeing at all life stages. They help to protect against malnutrition in all its forms, including undernutrition, micronutrient deficiency, overweight and obesity) as well as NCDs, such as diabetes, heart disease, stroke and cancer. The exact make-up of healthy diets varies depending on individual characteristics (e.g. age, gender, lifestyle and degree of physical activity), cultural context, local availability of foods and dietary customs. They are diversified, balanced, and safe and should limit the intake of saturated and trans fats, added sugars, and sodium. Healthy dietary practices start early in life – breastfeeding fosters healthy growth and improves cognitive development and may have long-term health benefits<sup>26</sup>.

We reject the step back to separating the definition of sustainable healthy diets from healthy diets. The step back in having a medicalized definition of healthy diets leaves the possibility to see diets as a concept completely separated from its ecological aspect.

21. **Sustainable healthy diets** are healthy diets that combine all the dimensions of sustainability to avoid unintended consequences and undermine healthy diets of future generations. They contribute to the preservation of biodiversity and have a low environmental pressure and impact<sup>27</sup>.

The Draft One took an important step forward in developing the concept of sustainable healthy diets. The Draft for negotiations should re-include the latter and be consistently reflected throughout the document. The entire document should refer to “sustainable healthy diets” instead of “healthy diets”.

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<sup>24</sup> 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”.

<sup>25</sup> 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”.

<sup>26</sup> Adapted from WHO healthy diet: [www.who.int/news-room/fact-sheets/detail/healthy-diet](http://www.who.int/news-room/fact-sheets/detail/healthy-diet)

<sup>27</sup> Adapted from [FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome](#)

22. **Nutritious foods** are those foods that tend to be *high* in essential nutrients such as vitamins and minerals (micronutrients), as well as proteins, unrefined carbohydrates such as fibre, and/or unsaturated fats and are low in sodium, added sugars, saturated fats and trans fats.

We reject the attempt to narrow the understanding of diets and shift attention away from healthy and sustainable diets towards nutritious food throughout the document. Nutritious food is an industry-led characterization that aims to distract attention from the wider social, economic and ecological implications towards purely nutritional qualities, often defined in industry-serving terms, of single foods. It might evoke that processed or even ultra-processed packaged food can contribute with the same quality and adequateness to healthy diets as fresh, local and diverse food.

23. **The right to adequate food** 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. The right to adequate food implies the availability of food in a quantity and quality sufficient to satisfy the dietary needs of individuals, free from adverse substances and acceptable within given culture.<sup>28</sup>

In line with the previous comment, the right to adequate food should also include “adequate nutrition”.

If we are to transform our food systems, we must transform them into food systems that recognize the rights of food producers, food consumers and the Earth. Not only must the references to human rights be kept in paragraph 23, the guidelines must recognize the right to food and the rights of peasants, indigenous peoples, fisherfolk and other rural working populations. It must also recognize the rights of what we have now recognized as frontline workers: migrant agricultural workers on farms and in meat processing plants, grocery store workers, delivery workers and the many workers involved in food supply chains. The COVID-19 crisis has reminded us that our food systems will be left completely disrupted without food producers and without food workers. Respecting their rights are crucial to building food systems that will be resilient in the face of the current and future pandemics.

Adequacy – The nutritional aspect: The UN CESCR clarifies in its definition of the right to adequate food in its General Comment paragraph 6 that the right to adequate food “shall not be interpreted in a narrow or restrictive sense, which equates it with a minimum package of calories, proteins and other specific nutrients”.

It also clarifies that the adequacy of food depends on the social, economic, cultural, climatic, ecological and other conditions and that both, the quantity and quality depend on the individual needs of the right holder<sup>29</sup>. Likewise, the Committee highlights the importance of food diversity and an adequate nutrition “for mental and physical growth, through the life cycle, according to gender and occupation<sup>30</sup>”

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<sup>28</sup> 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).

<sup>29</sup> CESCR, General Comment 12 par 8.

<sup>30</sup> Ibidem par 9.

Moreover, the Committee highlights the cultural acceptability of food<sup>31</sup>, which is of critical value for indigenous peoples, ethnic minorities and other rural communities non nutrient-based values attached to food and food consumption.

An important aspect of food adequacy is the food safety. This implies the absence of organic and/or chemical adverse substances. The pollution of water with organic bacteria can be caused for instance by poor hygienic conditions or lack of sanitation facilities. The chemical contamination of food could be caused by toxics, for example, those derived of pesticides or of the use of heavy metals used in mining activities and which very often end up in cultivations and water used for food preparation. The Special Rapporteur on the Right to Food has written a report on the adverse effect of pesticides on the right to food<sup>32</sup>.

## PART 2 – OBJECTIVES AND GUIDING PRINCIPLES

### 2.1 OBJECTIVES AND PURPOSE

The will of a profound transformation of current food systems has to be highlighted as an overarching goal in all parts of the VGFSyN and find its materialization in Part 3. To this regard, the recommendations of the regional consultations must be reflected in the Guidelines.

The normative direction of the transformation has to be very clear:

1. to contribute to the realization of the right to adequate food. In line with this, the transformation towards more equitable and sustainable food systems has to be first and foremost for the benefit of the groups most marginalized and discriminated by current food systems. Prioritization of the groups marginalized and discriminated by current food systems is mandatory under human rights law. In this sense, they should have a special mention while addressing the overall goal and purpose of the Guidelines. They should be the ones benefitting from a transition towards sustainable and equitable food systems. This requires systemic rather than sectoral changes, and overall policy coherence with the right to food. It also requires a focus on the basic and root causes of malnutrition; as well as on new determinants such as the climate crisis and dematerialization of food;
2. amidst the COVID crisis, to prevent crises. In this sense, the lessons which are arising and will emerge from the COVID crisis, should cut across the entire document and promote the urgent transformation of food systems to make them resilient, sustainable, equitable and healthy. If addressed within the document, a separate section merely on the COVID crisis should not be created, which would only undermine the scope of the Guidelines.

Furthermore, the VGFSyN in its current draft cannot meet the important goal of addressing policy fragmentation. It should be addressed through a systemic approach, one that explores the interconnections between ecology, agriculture, food, and human health. The aggregation of elements presented by the current draft does not build a system, due to the lack of visualization of the connections between them.

Learnings from the regional consultations should be included at this purpose.

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<sup>31</sup> CESCR, General Comment 12, Par.7 and 11.

<sup>32</sup> Special rapporteur on the Right to Food, A/HRC/34/48, 24 January 2017.

24. The **objective of the VGFSyN** is to contribute to transforming food systems<sup>33</sup> and promoting sustainable food systems to ensure that the food that contributes to sustainable healthy diets is available, affordable, accessible, safe, and of adequate quantity and quality while conforming “with beliefs, culture and traditions, dietary habits, and preferences of individuals, in accordance with national and international laws and obligations”<sup>34</sup>.

25. The VGFSyN follow a **comprehensive, systemic, and science- and evidence-based approach** to addressing policy fragmentation with a special emphasis on the food, agriculture, and health sectors, while also addressing social, environmental and economic sustainability issues. The VGFSyN provide guidance on effective policies, investments and institutional arrangements. The VGFSyN are expected to address the diversity and complexity of food systems with the intention of promoting policy coherence, considering benefits and trade-offs, and fostering and guiding dialogue among different institutions and sectors.

References to science and evidence-based approaches have been strengthened with the inclusion of “peer reviewed publications”, “data management” and “surveillance” throughout the document. While we believe research is important, we urge not to reduce it to (positivist) science and evidence-based approaches but to include also alternative forms of knowledge based on experiences and traditional and indigenous forms of knowledge-sharing such as oral transmission.

The uncertainty of today’s crisis implies reviewing the multiplicity of determinants that prevent the full realization of the Human Right to Adequate Food and Nutrition, and these determinants are not only interpretable from the conventional positivist scientific perspective, also being questioned today. Agroecology is an example of objectivity built from other forms of knowledge, and which has provided resilience in the current context of crisis.

This concerns also point 27.

26. The VGFSyN are intended to be global in scope and to provide **guidance to policy-makers and relevant stakeholders** when designing context-specific policies, laws, regulatory frameworks, 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.

27. These VGFSyN take **evidence** from a range of rigorous studies, best practices, and world experience - at municipal, at sub-national, and at national levels - and apply the evidence through a broad lens.<sup>35</sup> Much of the evidence in the VGFSyN comes from the HLPE 2017 report, various UN technical documents, and peer-reviewed scientific literature.

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<sup>33</sup> [UNGA Resolution A/RES/74/242](#). Paragraph 40.

<sup>34</sup> FAO/WHO. 2014. ICN2, [Rome Declaration on Nutrition](#). Paragraph 5.b.

<sup>35</sup> Because situations can vary widely, the generalizability of evidence to other situations is absolutely crucial, but not always available, for food system actions that address diets and nutrition. Additional research designs are needed to contribute to the evidence-base of policymaking. The VGFSyN bring together evidence from different methodologies: some of which is



## 2.2 NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS

28. 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 \(1948\)](#) and other agreed international human rights instruments, **in particular the International Covenant on Economic, Social and Cultural Rights**, and with due regard to voluntary commitments under applicable international and regional instruments.

In defining the nature of the Guidelines as "voluntary", it is excessive to state that they are "non-binding".

CFS guidance should build upon and integrate existing instruments and frameworks for action adopted in the context of the UN system, guidance, and recommendations endorsed by Member States.

A clear normative framework, based on human rights and in the context of a food systems approach, is still lacking in the document.

The guidelines should reference legally binding obligations from human rights legislation or framework conventions and national and international law more explicitly. In this sense, the wording should differentiate "rights holders" from "duty bearers".

We reaffirm the necessary centrality of human rights in any normative framework agreed by the CFS, not only with respect to the Right to Adequate Food but equally to the right to health, the rights of workers, peasants, fishers and indigenous peoples, the rights of women, the rights of children and other related rights.

29. The VGFSyN are intended to **avoid duplication of the work and mandate of other international bodies**, and build upon and complement related guidance contained in other CFS products with specific attention paid to:

- [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 – RAI](#) (2014),
- [CFS Policy Recommendations on Food losses and waste in the context of sustainable food systems](#) (2014),

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experiential that holds promise for real-world relevance, some comes from the evaluation of programmes and policies that provide guidance on implementation in specific settings and contexts.

- [CFS Framework for Action for food security and nutrition in protracted crises – FFA \(2015\)](#),
- [CFS Policy Recommendations on Water for food security and nutrition \(2015\)](#),
- [CFS Policy Recommendations on Connecting smallholders to markets \(2016\)](#), and
- [CFS Policy Recommendations on Sustainable agricultural development for food security and nutrition: what roles for livestock? \(2016\)](#).

The CFS process on “Agroecological and other innovative approaches” should be fully taken into account by the VGs, as agroecology, also considered as an innovation, provides an immediate solution to the current challenges both by protecting the environment and producers and by enabling the local production of healthy and sustainable food for all. Agroecology offers local solutions and empowers local economies and markets by keeping farmers in the field with improved livelihoods and a better quality of life. It focuses on building local value creation, processing capacities and markets (farmers' markets, direct marketing, etc.) for a sustainable supply of healthy food. This seems particularly important to us in light of the current food crisis, which once again illustrates the vulnerability of the existing system.

30. The VGFSyN are **primarily targeted at governmental actors** to help them develop holistic and inclusive public policies. They are also 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 UN agencies;
- c) Civil society and non-governmental organizations, including those representing Indigenous Peoples, vulnerable groups and communities, and smallholders, fisherfolks, pastoralists, landless and workers;
- d) Farmer organizations and their networks;
- e) Private sector actors, including agribusiness, food and beverage manufacturers, food retailers including supermarkets, food service providers, industry trade associations, food wholesalers, food distributors, importers and exporters, and the advertising and marketing industry<sup>36</sup>;
- f) Research organizations, academic institutions, and universities;
- g) Development partners, including international financial institutions;
- h) Private donors, foundations, and funds;
- i) Consumer associations.

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<sup>36</sup> The private sector is made up of many different types of companies with a wide range of sizes, scales, human and financial resources, as well as varying reach into local, domestic and international markets.

## 2.3 GUIDING PRINCIPLES FOR TRANSFORMING FOOD SYSTEMS OR PROMOTING SUSTAINABLE FOOD SYSTEMS

The guiding principles should emerge from the analysis made in the background and rationale. An analysis that presents current food systems as dysfunctional as they result in unhealthy diets, unsustainable footprints and impoverishments of small-scale producers. They are the outcome of a supply-driven and macroeconomic approach to commodified food, which itself has shaped to a large extent research to date.

In this sense, the title should emphasize that the dominating food system, namely the global industrial one, needs to be transformed. Despite this, the report is biased towards industrial-scale food production to the detriment of family farming. While increased dietary diversity is certainly needed, priority should be given to making the best of local biodiversity and ecosystems, contributing to the resilience of local food systems. In this sense, areas most affected by the today's crisis are those most dependent on international trade.

This section should serve as assessment of whether future food systems will be sustainable or not according to these guiding principles and most importantly the realization of the right to adequate food for all (see also comments on Part IV on Implementation and Monitoring).

We reaffirm the necessary centrality of human rights in any normative framework agreed by the CFS, not only with respect to the Right to Adequate Food but equally to the right to health, the rights of workers, peasants, fishers and Indigenous Peoples, the rights of women, the rights of children and other related rights. A clear reference to all these rights must be included in the Guiding Principles.

See comment on point 14 and section 1.1.

31. The VGFSyN include **five guiding principles**<sup>37</sup> that emerged from the consultation process as foundational when considering the different actions that should be followed to contribute to transforming food systems and promoting sustainable food systems that enable healthy diets.

32. These principles draw on the need to ensure **participation, accountability, non-discrimination, transparency, human dignity, empowerment and equality, and the rule of law** in order to contribute to the progressive realization of the right to adequate food in the context of national food security.

The interdependency of human rights as a basic principle has to be recognized for the document to be relevant at all times, even during crisis such as the one we are currently facing.

- a) **Systemic, multisectoral, science- and evidence-based approach.** Promote a systemic, multisectoral, 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.

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<sup>37</sup> These guiding principles are consistent with already agreed international documents and tools, such as the Rome Declaration on Nutrition and the Framework for Action of ICN2.

Include also alternative forms of knowledge based on experiences and traditional and indigenous forms of knowledge-sharing such as oral transmission.

See comment on point 25.

- b) **Coherent and context-specific policies.** Contribute to the formulation and implementation of coherent and context-specific policies and related investment through coordinated actions among different actors and across all relevant sectors at international, regional, national, subnational, and local levels.
- c) **Accountability, transparency and participation.** Support efforts in strengthening governance and accountability mechanisms that contribute to fostering citizen participation in national debates on food security and nutrition and on food systems, and transparent and inclusive decision-making processes, based on transparent rules of engagement including safeguards against potential conflicts of interest.
- d) **Healthy people, healthy planet.** Promote policies and actions that enhance the livelihoods, health, and well-being of the population, as well as sustainable food production and consumption to protect natural resources, ecosystems and biodiversity, and ensure mitigation of and adaptation to climate change.

The nexus should be strengthened: healthy diets require a healthy planet.

- e) **Gender equality and women's empowerment.** Promote gender equality and women's and girls' empowerment, and respect, protect and fulfill their rights, creating the conditions for women's involvement in decision-making and strong engagement in shaping food systems that improve nutrition, recognizing their key role in care, education, agriculture, health promotion and food preparation and consumption, while promoting gender-equitable practices.

Beyond the centrality of women's rights, it is important to challenge the notion that the work of feeding and caring is "women's work" and therefore they must be educated and empowered so that they can care better. This analysis fails to acknowledge the importance of sharing the burden of care and feeding work across genders and creating the structural conditions necessary for this to happen so that feeding no longer becomes the exclusive domain of women.

It is important to include within the gender analysis, the fulfilment of rights of people whose gender identity may be subject to exclusion or discrimination.

Comment further developed in section 3.6

## PART 3 - THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION

There is a problematic notion of food underpinning the draft, as we see no understanding of the multidimensionality of food and the multiple objectives it can serve (paragraph 32 from the Guiding Principles of the First Draft was even removed).

Food should not be seen as just a commodity capable or not to “provide” good nutrition. Food should be providing good health for all, as well as ensuring that local, diverse and fresh produced food is accessible to all and originated at the hands of small-scale food producers, respecting the local culture and social relations, even at times of protracted social distance measures.

33. With the aim of ensuring the progressive realization of the right to adequate food in the context of national food security, the VGFSyN provide a framework to promote policy coherence and to bring various stakeholders who are involved in food systems to work together to ensure healthy diets for everyone.

34. To achieve the WHA and 2030 Agenda targets and national commitments to end malnutrition in all its forms, **a food system approach is needed** that recognizes that the various parts that make up food systems are interconnected; that any action or decision to address one aspect of a food system will likely impact other aspects, and that food systems respond and are impacted by other systems, situations, and contexts. Thinking systematically and interdisciplinary toward food system transformation can ensure that challenges are tackled from multiple perspectives.

We agree with the statement made here but are concerned that the VGFSyN fail to fully adopt this food system approach, because they are too focused on a medicalized understanding of food systems and diets and do not include in an appropriate manner ecological, cultural and social dimensions, the power imbalances that shape current food systems, alternative forms of knowledge and other important aspects. As we explain in other comments, the separation of healthy and sustainable diets, the focus on food safety and the restriction in point 3.2. to “sustainable food supplies for improved nutrition” instead of “Sustainable food systems for healthy and sustainable diets” are clear indications for a lack of a food systems approach.

Furthermore, the VGFSyN lack of acknowledging the importance of public goods and fail to rely on pathways that have already proved to be transformational, such as agroecology.

In this sense, the COVID crisis has exposed the centrality of public systems as bulwarks against public health disasters, and the impacts of decades of undermining of public services through austerity measures, privatization, neoliberal economic policies, and public-private partnerships. We therefore call for the Guidelines to be primarily directed to informing public policies and systems, reclaiming the public nature of food systems, and the centrality of healthy and sustainable diets in reclaiming our commons and advancing a deeper understanding of how public goods and services can strengthen the Right to adequate food and nutrition, as well as food security and nutrition.

Thus, the VGFSyN provide guidance on a mix of regulatory, fiscal, and other policy actions spanning the diversity of food supply chains, food environment and consumer behavior, as well as the drivers and people that shape those actions.

35. These guidelines are structured around seven focus areas: i) transparent, democratic and accountable governance of food systems; ii) sustainable food supplies for improved diets and nutrition in the context of climate change; iii) equitable access to healthy diets delivered by sustainable food systems; iv) food safety across sustainable food systems; v) social relations, knowledge and culture of diets; vi) gender equality and women's empowerment across food systems; and vii) resilient food systems in humanitarian contexts.

36. The HLPE report was structured around three main constituent elements of food systems<sup>38</sup> and proposed a wide number of policy areas and drivers of change (See **Figure 1**). During the consultation process, CFS stakeholders identified a number of cross-cutting factors that are relevant for improving diets and nutrition and hence the origin of these seven focus areas. The first area, the governance of food systems, establishes the foundation of the remaining policy recommendations of the VGFSyN. Governance, as a major driver in shaping food systems, is interweaved across the six other areas. Three areas cover the main components of food systems while an additional area is based on the recognition of the increased importance of collective action in addressing food safety. Special attention is focused on women because of the vital role they play in food systems. The humanitarian context serves as a standalone area because it will continue to be a significant global issue in the context of climate change, protracted crises, conflict and migration.

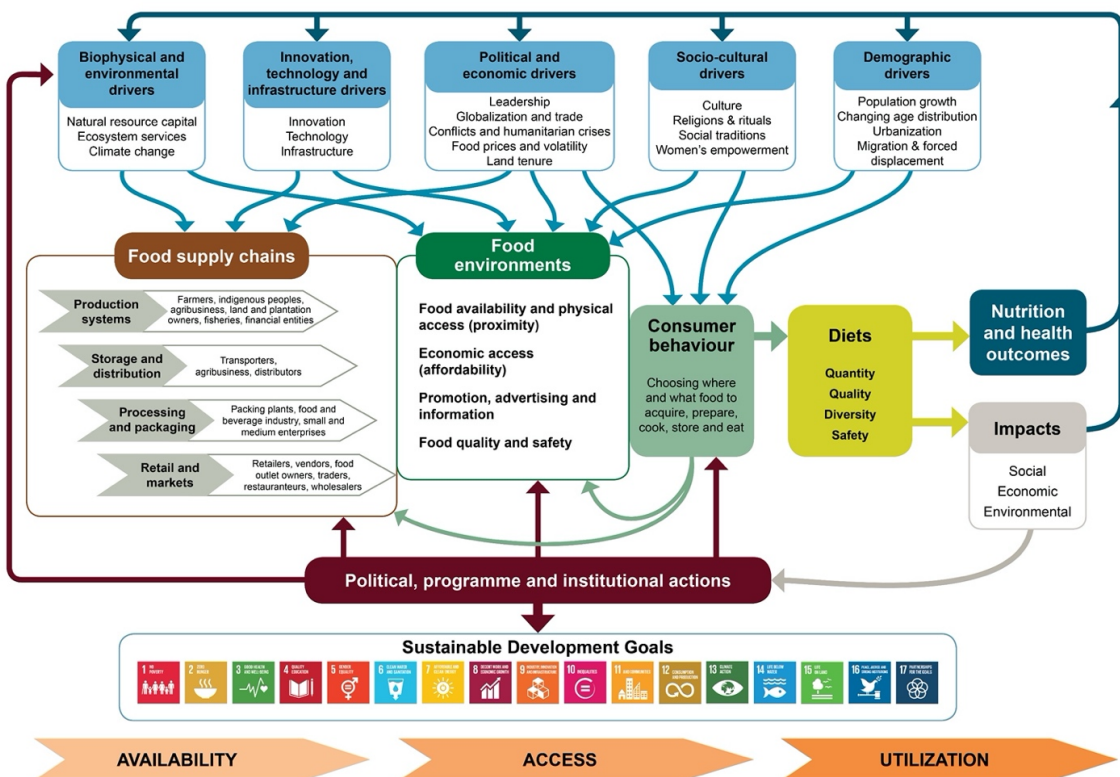
Many different conceptual frameworks are possible to expose the relations and dynamics that connect food systems with nutrition and diets. Diets represent one of the many battlefields between these two alternative approaches to food production, marketing and distribution. While they may at times cohabit, the industrial system tends to squeeze the local food systems through many different points of attrition (from access to resources and inputs to distribution channels). In this regard, we believe that the addition of figure 1 might be misleading in re-emphasizing the first analysis made by the HLPE report without taking into account the discussions held during the Regional Consultations. The Guidelines should highlight useful pathways for policy action in order to address these tensions. An immediate consequence becomes apparent from this critique: there is an excessive focus on healthy diets rather than on a more holistic understanding of diets that includes the environmental footprint and the livelihoods/economic consequences of dietary choices that provide the feedback loop with production. The discussion of healthy diets should mention that freshly prepared meals are healthy and more nutritious than ultra-processed, pre-prepared foods. This distinction is not made.

**Figure 1: HLPE Food Systems Framework<sup>39</sup>**

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<sup>38</sup> Food supply chains, food environments and consumer behaviours

<sup>39</sup> HLPE 2017b



37. The guidance is principally addressed to governmental actors who should consider it in relation to national and sub-national priorities, needs and conditions, and assess the relevance of the policy entry points and actions as they pertain to their own food system contexts. It is important for countries to undertake a diagnostic lens to their food systems in a systematic and holistic way. This would entail understanding the types of food systems that exist, the make-up and complexity of their food systems, and the major trigger points for change, disruption, exclusion/inclusion and growth. Governmental actors are encouraged to systemically analyze the potential transition costs, benefits, trade-offs, and impacts of their actions, considering their effects across sectors and actors within their own context of environmental, economic and socio-cultural conditions and objectives.

### 3.1 TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS

In the light of the current crisis, more than ever the centrality should be put at the heart of public interest. Collaboration among the different sectors and levels of governments should allow an equitable distribution of investment and actions promoting sufficient production and adequate, resilient and sustainable and healthy food systems for all. Building on multi-sectoral actions and coordination will be essential but “inclusive dialogue” must be managed to ensure vested interests do not influence public policy.

In leadership, governance, and accountability, the issue of conflict of interest must be paramount, with mechanisms for monitoring and reporting all forms of corporate capture to government, scientific, academic, civil, educational, and other sectors.

It is critical to include in this section a reference to the need for effective safeguards against conflict of interest (Col) and other safeguards that ensure governance is based on human rights and public interest. Reference can be made to the ICN2 Framework for Action, which has clearly spelled out this need (Recommendation 3). Beyond regulating the direct and indirect participation of the private sector in public policy and program development and implementation, Col and other safeguards should guarantee:

- the trustworthiness of data collection and knowledge generation in research and monitoring processes;
- the financial independence of public spaces, programs, and education. These should be free of conflicts of interest.

38. This section lays out the criticality of governance mechanisms, leadership and accountability across the range of actors, from global to local levels, within food systems. Governments are responsible for developing sound public policies, and regulatory and legislative frameworks that govern food systems, promote awareness, and set priorities for impactful action. Governments also need to manage conflicts of interests, power imbalances, and other safeguards to put public interests before other interests.

### 3.1.1 Promoting policy coherence by integrating nutrition into national development

- a) Governmental actors should **foster policy coherence across sectors** to reduce all forms of malnutrition from a food system perspective. Governmental actors should prioritize sustainable food systems in order to effectively align relevant sectors around a common set of goals.
- b) Governmental actors should **integrate sustainable food system actions** that promote healthy diets and nutrition into national and local development, health, economic, agricultural, climate/environment, and disaster risk reduction plans. This integration should be complemented with **increased and improved budgetary allocations** to food system activities with clear objectives of improving diets and nutrition with indicators to track and assess the full cost accounting of addressing malnutrition in all its forms.
- c) Governmental actors should **ensure that international and bilateral trade and investment agreements** are consistent with nutrition, food and agriculture national policies, and international food safety standards (e.g. Codex Alimentarius and World Organization for Animal Health standards).

While priority should be given to re-localize food systems, it is necessary for trade agreements to favor transition towards more healthy and sustainable food systems and assess how the health, environment, social and economic outcomes of food systems are likely to be affected by such agreements.

The CFS is, of course, not the space for negotiating trade-investment rules; however, it does have the mandate to uphold the right to adequate food and outline principles to avoid the dangerous pitfalls that come from trade-investment arrangements that foster undue dependence on imports to meet national food security needs, and encourage monopolies in food exports. Especially important here is guidance that recognizes the importance of public procurement from small scale food producers, price controls on essential food staples to



prevent price gouging and market concentration, and other public measures that protect and strengthen local, small-scale food production systems.

- d) Governmental actors and intergovernmental organizations should identify opportunities within food systems to **achieve national and global food security and nutrition goals, targets, and indicators** set out by the WHA and the 2030 Agenda for Sustainable Development.

### 3.1.2 Strengthening multisectoral coordination and actions

- a) Governmental actors, intergovernmental organizations and development partners should work to **improve diets and nutrition across sectors, ministries, and agencies at all levels** through strengthened legal frameworks and institutional capacities that address the multiple causes and consequences of malnutrition in all its forms. This coordination should **establish and/or strengthen multisectoral, multistakeholder mechanisms** that oversee the design and implementation of evidence- and science-based policies, strategies, and interventions that contribute to diet and nutrition outcomes from national to local levels, adopted in accordance with multilaterally agreed rules.

We believe that references to multi-stakeholder platforms are highly problematic, as they mask the potential differences in interests, power, and legitimacy of different actors within food systems. The primary role of the State (duty bearer) in food system governance has to be further highlighted.

Multi-stakeholder platforms give the private sector a privileged access to public decision-making. The inclusion of those governance forms clearly reflects a corporate capture of the process and threatens to place the voices of small farmers and indigenous peoples after the interests of large corporations.

- b) Governmental actors should **facilitate an inclusive and transparent dialogue** ensuring the participation of a range of stakeholders working with or in food systems, including civil society organizations, the private sector, intergovernmental and regional organizations, Indigenous Peoples, youth, consumer and farmer associations, donors, and development partners. This dialogue should include all dimensions of food systems, as well as the protection of natural resources and the environment, social cohesion and inclusion.

Governmental actors must take into account imbalance of power when facilitating such a dialogue.

The Voluntary Guidelines should enable the most marginalized groups to participate in an inclusive manner to decision-making in order to define the policy orientation of development measures. This will ensure the alignment of such measures with their social, economic and cultural environment.

- c) Governmental actors, intergovernmental organizations, and civil society organizations should **encourage increased commitment to action with responsible investment**<sup>40</sup> from the public sector, private sector actors, and donors to support sustainable food systems that promote healthy diets, while considering trade-offs with other policy priorities.

### 3.1.3 Creating accountability mechanisms, monitoring and evaluation

- a) Governmental actors should establish or strengthen regulatory and legislative frameworks to govern private and public sector activities related to food systems. They should **institute robust, transparent accountability mechanisms** that promote good governance, public deliberation, independent bodies that monitor compliance and performance, individual complaint procedures, remedial actions to improve accountability, systematic management of conflicts of interest and vested interests, power imbalances, and capacity to settle disputes that may undermine public health. Governmental actors should ensure that dialogue with the private sector is transparent and follows clear roles and responsibilities for engagement to safeguard the public interest.
- b) Governmental actors, in partnership with research organizations and intergovernmental organizations, should improve the availability and quality of **multisectoral information systems and national surveillance systems** that capture, harmonize and disaggregate data and indicators across all aspects of food systems and outcomes related to food security, diets (particularly dietary intake and dietary quality), food composition, and nutrition (including the measurement of micronutrients and anthropometry) for improved policy development and accountability, and better targeting of public programmes.

**The term surveillance systems should be removed or replaced by “monitoring system”.**

- c) Governmental actors, with the support of intergovernmental organizations, should **promote investment in human, system, and institutional capacity** to analyze food system information in a comprehensive manner to support the planning, monitoring, and evaluation of programmatic actions.

**We accept the importance of evidence as the basis of building robust governance and monitoring systems, well targeted public policies and programmes, equity, sustainability, and so on. However, it is crucial that evidence from small-scale food producers, workers, IPs and those who are marginalised, discriminated against and made vulnerable, is central to this evidence.**

**Past and ongoing experiences—as in addressing COVID-19— show that policy makers, scientific experts and academic institutions are generally far away from the actual realities that much of the public face. Often times—again as in the COVID-19 pandemic is teaching us – there are competing and even contradictory scientific explanations, and what can be claimed with scientific certainty is not enough to shape robust, responsive, transparent and effective public policies and actions. Also many scientific studies and evidence-gathering initiatives conducted by large institutions require large financial outlays that could compromise their independence. Upholding the public interest—as the VGFSyN aim to do—necessarily requires feedback and assessments from the public. While dialogue with the private sector is important—as with all**

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<sup>40</sup> In line with the CFS Principles for responsible investment in agriculture and food systems, RAI (2014).

societal and economic actors—the basis of this dialogue must be to ensure public welfare and interest, not subsidize the private sector through PPPs.

### 3.2 SUSTAINABLE FOOD SUPPLIES FOR IMPROVED DIETS AND NUTRITION IN THE CONTEXT OF CLIMATE CHANGE

In accordance with the comments made before the title should be changed to emphasize that not only food supplies need to be sustainable in all dimensions but the totality of food systems. The current title assumes linearity and undermines the benefits of short-circuited chains for nutrition, sustainability and livelihoods. These guidelines should include recommendations relating to the promotion of methods that serve to shorten food chains, avoidance/limitation of processing and reduction of distances between consumers and producers. These approaches have nutrition, health, economic and sustainability benefits. It would be more appropriate to talk about sustainable food systems (referring to definition on comment about point 14) rather than “sustainable food supplies”.

Furthermore, this section welcomes all approaches to achieve “sustainable” food systems, suggesting that the coexistence of all modes of productions is possible. This section would benefit greatly from the interlinkages with the CFS process on “Agroecological approaches and other innovations” to include the assessment framework on ecological footprint and agency (e.g. risks of pesticide use for producers, consumers and the environment). Agroecology has in this sense proven to be a true transformational pathway towards encompassing food, equity, human and planetary health. Instead of the concept of food security, the VGFSyN should turn to the concept of food sovereignty, as it offers paths for the necessary transformation to localized, just, sustainable and healthy food systems.

Finally, the term “improved diets and nutrition” is not adequate as it cuts short of the full scope of sustainability that food can serve, from environmental to economic, social and cultural. The term should be replaced with “sustainable healthy diets”.

This calls upon governmental actors to regulate nutritional labelling and consider front-of-pack interpretive labelling (FOPL), for example, warning labelling, to promote sustainable healthy diets. This also deserves to be distinguished explicitly from seeing fortification as the only solution to contribute to healthy diets (refer to comment on point 3).

39. Food supply patterns play an important role in health and environmental sustainability. Food supplies - from production, storage, processing and packaging, and markets - operate at assorted scales, structures, and levels, from simple to highly complex and globalized supply chains involving many food system actors. This section complements the goals outlined in the UN Decade of Family Farming and highlights the importance of improving nutrition as food moves through the system, indicates which food system actors should be given special attention, and suggests ways to create resilient food supplies in the midst of climate change and natural resource degradation.

#### 3.2.1 Prioritizing climate adaptation and mitigation across food supplies

All the points in 3.2.1. are based on an approach that understands climate change exclusively as a natural phenomenon, an approach, which relies on a conventional understanding of food production (agro-industrial food production, linear value chain approach without a food system approach) and sees this model as the only solution. However, the ecological crisis we are facing result in great part from this model. Sustainability should not be merely seen through the climate lens as a “pre-condition” which leads purely to specific solutions on only part of the broader crisis. Instead, transformation of our food

systems should take into account the approaches which can adapt, mitigate and instore resilience to the current climatic and ecological context. In this sense, assessment frameworks should be put in place to evaluate sustainability in this systematic way (not only climate related, but also soil, biodiversity and land degradation on the ecological side, and social aspects too). Referring to the Policy Recommendations on “Agroecological and other Innovative approaches” would be therefore useful in this regard. More in particular, the agroecological approach is a kind of innovation that includes the assessment framework on ecological footprint and agency.

- a) Governmental actors (including national extension systems), development partners, NGOs, and private sector actors should **assist** farmers and other food producers to adapt to, and ensure food supply chains are resilient to, climatic shocks by managing risk and building preparedness and resilience. Assistance can include access to finance, insurance, forecasting data and methods, and immediate help through service apps (e.g. to identify plant diseases and parasites). Assistance could also include protecting crops, livestock, and fisheries and overall production systems from the anticipated impacts of climate change in the form of pests, diseases, weather-related shocks, and adopting drought resistant varieties, as well as productive-asset creation initiatives (e.g. rehabilitating degraded land and infrastructure development).
- b) Governmental actors, intergovernmental organizations, NGOs, and private sector actors should support and assist farmers and other food producers to **reduce the environmental impact** of food systems. This could be done by fostering the adoption of appropriate technology and on-farm management practices to improve crop yields and reduce pesticide usage. Governmental actors should promote optimization of agricultural outputs per unit of water, energy, and land, and reduce greenhouse gas emissions, biodiversity loss, and natural resource degradation of agriculture activities.

Technologies need to adhere to real needs and therefore be demand-driven and locally adapted, rather than be promoted by a supply-driven approach

- c) Governmental actors should **institute surveillance systems** (including early warning systems), quality indices (e.g. integrated diversification and agro-biodiversity targets) and other food system and dietary metrics to monitor changing conditions and the effectiveness of policy responses.
- d) Research organizations, academic institutions, and universities should promote the **generation and use of rigorous science and evidence** that demonstrate robust mitigation and resilience strategies to climate change for sustainable food systems and sustainable healthy diets. Research should focus on potential interventions and policy entry points to ensure agricultural production, processing and packaging, retail and markets, and consumer demand contribute to support food producers in their efforts to adaptat to climate change, mitigate their impact, and reduce natural resource degradation.

### 3.2.2 Ensuring sustainable use and management of natural resources in food production

Currently, the notions of 'biodiversity loss' and 'sustainable use' are weak. On-farm (or in-situ) conservation of agricultural biodiversity plays, however, a critical role. In this sense, the Guidelines should include the need for the protection of agricultural biodiversity and people's bioculturality, to ensure sustainable food systems.

This diversity, in seeds, animal breeds and traditional and Indigenous plant varieties is key to sustainable food systems. Equally important are the diverse knowledge systems that help maintain, co-create and INCREASE biodiversity within a particular species of plant. For example, farmer-breeders in Central America have developed, and are keeping alive, hundreds of varieties of beans -- in the centre of diversity.

Furthermore, these guidelines should explicitly uphold the critical role of the world's peasant, smallholder farmer, and food provisioner community as the guardians of agricultural biodiversity. This also relates to food sovereignty of course, as farmers and food provisioners who have more control over agricultural biodiversity are able to build more resilient food systems.

- a) Governmental actors and farmers and their organizations should **address soil health** as central to agricultural production systems. Governmental actors should encourage the use of integrated soil fertility management practices to maintain and increase crop productivity in a sustainable way, and provide appropriate incentives for the use of sustainable land management services and agricultural practices to maintain soil biodiversity and nutrient balance and promote carbon storage.
- b) Governmental actors should **improve the management and control of water resources** for agriculture and food production through improved regulation, community participatory approaches, and water stewardship approaches that involve civil society organizations, private sector actors, and other stakeholders.
- c) Governmental actors should **foster the protection, conservation, and sustainable use of biodiverse, productive systems** that include diverse crops and livestock, neglected and underutilized species, forestry and plantations, fisheries and sustainable aquaculture as well as biodiverse landscapes including forests, water and coastal seas. This should be complemented through the adoption and application of sustainable food production and natural resource management practices including agroecological and other innovative approaches<sup>41</sup> in a manner that is economically viable for all legitimate tenure rights holders to uphold those rights and maintain livelihoods.

Emphasis should be made towards circular agricultural production systems / production cycles that contribute to biodiversity, mitigate climate breakdown, do not pollute water and soil, .... In this sense, agroecological approaches should be separated from other innovative approaches in this paragraph, as this practice has proven to be the only one encompassing a wide range of environmental and social benefits.

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<sup>41</sup> HLPE. 2019. [Agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition](#). A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.

- d) Governmental actors should **protect the rights of Indigenous Peoples, small-scale producers, peasants, 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. Their livelihoods should be maintained, their traditional, collective knowledge and practices should be valued, their access to traditional food should be protected, and their diets, nutrition, and wellbeing should be prioritized.

Indigenous Peoples and local communities should also be supported to ensure that their food production systems can be maintained, in particular within the climate crisis context.

The Voluntary Guidelines should promote linkages between Rights and local development.

### 3.2.3 Promoting nutrition within agriculture and food production

- a) Governmental actors should **integrate nutrition objectives into their national agriculture policies**.
- b) Governmental actors, private sector actors, development partners and donors should diversify agricultural investment and incentivize all types and sizes of producers to **adopt sustainable production practices and to produce diverse, nutritious crops and food** that contribute to healthy diets, while ensuring a decent income, livelihoods and resilience for farmers, particularly smallholders and/or family farms, and farm workers. This should include supporting and encouraging sustainable livestock, agroforestry, animal and fishery systems (including artisanal fisheries and aquaculture).
- c) Governmental actors should **integrate urban and peri-urban agriculture** and urban land use into national and local agricultural development strategies, food and nutrition programmes, and urban and territorial planning, as a viable input into healthy diets for growing urban populations and social cohesion of communities.
- d) Governmental and private sector actors should ensure enabling environments to assist and ensure farmers and other food producers have **access to modern and sustainable technologies, technical assistance**, and nutrition information within agriculture and other extension technical packages, and provide skill training and capacity development to be able to use those technologies/assistance/information that could improve the production, safety, and nutritional quality of crops for markets.

Technological support and access to technology is part of a broader debate, in which it must be stressed that traditional strategies and instruments for sustainable agriculture (in all its dimensions) must not be sacrificed to the agro-industry. Agroecology should be recognized as technological innovation that cuts across social, environmental and health dimensions (as recognised by the HLPE on “Agroecological and other innovative approaches”) explicitly.

Technologies need to adhere to real needs and therefore be demand-driven and locally adapted, rather than be promoted by a supply-driven approach

- e) To reduce excessive food price volatility, governmental actors should **promote market information systems** that provide timely, transparent information about food-related market transactions, with more emphasis on nutritious commodities and orphan crops, including enhanced tracking of current and future food supply stock and price data.
- f) Governmental actors, private sector actors, donors and other relevant stakeholders should **invest in research, development, and innovation** for producing nutritious crops, such as fruit, vegetables, nuts and seeds, legumes, biofortified crops (developed through conventional on-farm breeding), and diverse animal-source food and breeding (e.g. dairy products, fish, eggs, and meat), which are developed keeping smallholder and/or family farmers' livelihoods in mind.

### 3.2.4 Improving food storage, processing, transformation and reformulation

We reject the strong references to “reformulation”, and are concerned about the lack of mention of “fresh food” and “unprocessed/processed food”, because this might imply that by introducing or removing specific nutrients, industrial food can meet nutrition, forgetting once again the negative impacts this food has in several dimensions.

Reformulation is often a strategy that promotes the change of one ultra-processed edible product into another, simply by meeting the required standards in terms of concentration of a certain nutrient, or by replacing sugar with a certain sweetener.

Changing one problematic ingredient for another, such as less fat but more sugar, or sugar replaced by artificial sweeteners, does not make ultra-processed foods healthy. Reformulated ‘premium’ ultra-processed lines ‘enriched’ with micronutrients and fiber sold with health claims at higher prices could prove to be comparably more profitable, but would remain unhealthy products. Therefore, the reformulation approach is a damage-limitation exercise.

The issue of frontal warning labelling is, therefore, central, in particular when it comes to ultra-processed food in order to differentiate them from fresh and un-processed food.

- a) Governmental actors, private sector actors, and donors should **invest in infrastructure** (e.g. storage facilities, roads and bridges, physical markets, market information systems) to prevent postharvest loss and ensure smallholder farmers and small and medium-size enterprises (SMEs) are able to deliver diverse, perishable, safe food to markets in sustainable ways.
- b) Governmental actors, private sector actors, and farmers and their associations should **facilitate minimizing food and nutrient loss** on farms, during post-harvest storage, and throughout processing, transportation, and retail (particularly perishable foods such as fruits, vegetables, dairy, eggs, fish and meat). Facilitation includes training and capacity on improved management practices and fostering the adoption of appropriate technologies<sup>42</sup>.

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<sup>42</sup> Technologies include cold chambers storage units, solar walk-ins, refrigerators, dry storage, storage drums and drying facilities.

Technologies need to adhere to real needs and therefore be demand-driven and locally adapted, rather than be promoted by a supply-driven approach

- c) Governmental actors should **establish guidance on the use of processing technologies**<sup>43</sup> that can improve the nutrient content of food, minimize post-harvest nutrient losses, and promote longer-term storage of food, particularly during periods of drought, flooding, and insufficient production.
- d) Governmental actors should **promote regulatory instruments and incentives** to promote reformulation, complemented with appropriate measures such as front-of-pack labels (FOPL) and taxes to minimize the promotion of foods high in energy density with minimal nutritional value, (such as foods high in sodium, sugar, and trans and/or saturated fats), in accordance with World Trade Organization (WTO) rules.
- e) Private sector actors should strive to **meet public health goals aligned with national food-based dietary guidelines** by further producing and promoting nutritious foods and food products that contribute to a healthy diet, such as increasing and preserving nutrient content and making efforts to reformulate foods, when necessary, by reducing the excessive content of sodium, sugar, and saturated fats, and eliminating trans fats in foods.

### 3.2.5 Improving nutrition and health of farm and food system workers

- a) Governmental actors should **ensure that the right to decent work** is respected, protected and fulfilled for farmers and other food producers and workers (including migrants and undocumented workers), that these populations are protected and safe, and that there is no unnecessary burden or undue labour (including child slavery) which could negatively impact their health status.
- b) Governmental actors and private sector actors should **provide social protection** when necessary to food producers and workers to ensure they are food secure, have living wages and sufficient livelihoods, and can access healthy diets and adequate health services.
- c) Private sector actors should strive to **improve the nutritional status of workers**, increase their access to nutritious foods associated with healthy diets in or through the workplace, and encourage the establishment of facilities for breastfeeding.

### 3.2.6 Empowering youth across food systems

- a) Governmental actors, intergovernmental organizations, and private sector actors should engage and empower youth by **removing obstacles and enhancing their access** to land, natural resources, inputs, tools, information, extension and advisory services, financial

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<sup>43</sup> Technologies include flash and solar drying, converting food to pastes and spreads, appropriate packaging to preserve nutrient content, and post-harvest fortification of food vehicles with micronutrients that are beneficial to health. Food fortification should be guided by national standards, with quality assurance and quality control systems to ensure quality fortification.



services, education, training, markets, and inclusion in decision-making processes in accordance with national legislation and regulations.

- b) Governmental actors, private sector actors, non-governmental organizations, and communities should **invest in appropriate vocational training, education, and mentorship programmes** for youth to increase their capacity and access to decent work and entrepreneurship opportunities to stimulate the transition toward sustainable food systems for the next generation.
- c) Governmental actors and private sector actors should **promote development and access to sustainable innovation, resource hubs, and new technologies** for youth along food supply chains that enhance nutrition and support social enterprises (particularly in countries experiencing high rates of youth internal and external migration).

Technologies need to adhere to real needs and therefore be demand-driven and locally adapted, rather than be promoted by a supply-driven approach.

### 3.3 EQUITABLE ACCESS TO HEALTHY DIETS DELIVERED BY SUSTAINABLE FOOD SYSTEMS

Sustainability aspects are lacking. Healthy and sustainable diets should be available, accessible and affordable. Factors for overcoming social injustice and social determinants of malnutrition should therefore be considered.

Incentives for healthy, diverse, fresh and sustainable food options are lacking when they are less affordable, accessible and available compared to processed and packaged food. Research on “food deserts” refers to those gaps in food provisioning and to the lack of access to high quality and nutritionally appropriate food (Del Casino Jr, V. J. (2015). Social geography I: food. Progress in Human Geography, 39(6), 800-808). VGFSyN should put more emphasis on the issue of access to local, healthy, diverse and fresh food and the strategies of government actors to achieve this.

40. Food environments comprise foods available and accessible to people in their surroundings and the nutritional quality, safety, price, convenience, labelling and promotion of these foods. These environments should ensure that people have equitable access to sufficient, safe and nutritious foods that meet dietary needs and food preferences for an active and healthy life<sup>44</sup>, considering the various physical, social, economic, cultural, and political factors that influence that access. For many people, access to healthy diets can be problematic as they may not be available, accessible, or affordable for a variety of reasons. This section outlines the potential policy entry points to improve physical and economic access, and availability of healthy diets within sustainable food systems in the places where people shop, choose, and eat food.

#### 3.3.1 Improving access to food that contributes to healthy diets

- a) Governmental actors should improve the availability and access of nutritious food that contributes to healthy diets through **trade and investment agreements and policies**, in

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<sup>44</sup> FAO. 2004. Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security. Paragraph 15.

accordance with WTO and multilaterally agreed rules, and use such agreements to ensure the progressive realization of the right to adequate food in other countries.

The mention of trade and investment agreements and policies as first point is contrary to the results of the regional consultations where food imports were identified as problematic.

- b) Governmental actors should **take into consideration an equity lens** when investing in actions to address food environments and ensure members of historically marginalized and vulnerable communities, residents of low-income communities, Indigenous Peoples, peasants, people facing physical constraints due to age, illness, or disability, and people living in rural areas have sufficient access and ownership to/of diverse food markets in accordance with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

Reference to the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP) should also be included.

- c) Governmental actors should **minimize physical barriers** so that people can grow, purchase, order or eat diverse types of foods that contribute to healthy diets in a given food environment. This can be done by instituting urban planning policies that encourage retail outlets that sell affordable nutritious foods that contribute to healthy diets, and that restrict the growth of retail outlets which sell an overabundance of foods high in energy density with minimal nutritional value, and promote home food production and gardens, where appropriate.
- d) Governmental actors should **encourage zoning laws, certifications and tax incentives** for farmers markets, mobile food retailers, street food vendors and other alternative retailers that sell nutritious foods that contribute to healthy diets in low-income areas, and reduce the concentration of vendors that sell foods high in energy density with minimal nutritional value.
- e) Governmental actors, in collaboration with consumer associations, can regulate and **incentivize local food retailers** to increase the number, variety, and sale of nutritious foods that contribute to healthy diets. This can be done by **creating local food policy councils** to give residents a voice in how best to improve availability, access and affordability of healthy diets in their communities.

### 3.3.2 Improving the availability and affordability of food that contributes to healthy diets

- a) Governmental actors should **consider fiscal policies to promote the affordability** of healthy diets. This includes subsidies to promote nutritious food options to ensure they are affordable and competitive compared with food and beverages high in energy density with minimal nutritional value for which industry tax benefits for their development and marketing should be removed.

Fiscal policies also include regulating the consumption of edible products that contain critical nutrients in excess, such as sweetened beverages and as soft drinks, and many others.

- b) Governmental actors should **strengthen public procurement systems** by ensuring healthy diets are available and convenient in public settings and institutions such as kindergartens and other childcare facilities, schools, hospitals, foodbanks, workplaces, government offices and prisons in line with national food-based dietary guidelines.

There should be a specific mention of the need to restrict the presence and sale of **ultraprocessed or high-density foods in schools**.

Public purchases from local suppliers and in short and seasonal circuits should allow the public sector to become one of the first consumers of healthy and sustainable production (e.g. school meals prepared with food purchased from local small-scale food producers).

- c) Governmental actors should **link the provision of healthy school meals with clear nutritional objectives**, aligned with national food-based dietary guidelines and adapted to the needs of different age-groups, with special attention to the needs of adolescent girls. Policymakers and UN agencies should consider **promoting home grown school meals**, where food served in schools is procured from local, smallholder and/or family farmers.
- d) Governmental actors and intergovernmental organizations should facilitate the affordability of healthy diets for poor households through **social protection programmes** such as vouchers, cash, school feeding, or food supplement programmes.
- e) Governmental actors, consumers, and farmer organizations should promote the availability of nutritious food that contributes to healthy diets through **local farmers markets, community cooperatives and other community-building efforts** that engage people around local food cultures.

### 3.3.3 Monitoring new technologies and promoting trends for healthy diets

Access to online food purchases should be regulated and must be based on the criteria of the Human Right to Adequate Food and Nutrition, and other interrelated rights (e.g. recent online platforms for delivering food do not fulfill workers' rights).

- a) Governmental actors should understand and acknowledge the influential roles of the **internet, social media, and online marketing of foods**, and should work toward monitoring and encouraging media companies to promote nutritious foods that contribute to healthy diets on social media spheres.
- b) Governmental actors should recognize the growing trend of **food purchased online and consumed away from home** (including street food) and should incentivize restaurants/online outlets to offer prepared dishes made from nutritious foods that contribute to healthy diets, display information about food on menus (i.e. calories, product composition, and other nutritional content), avoid food waste, and adhere to food safety regulations.

### 3.4 FOOD SAFETY ACROSS SUSTAINABLE FOOD SYSTEMS

Safety must be addressed in a systematic way, and not be considered for the “end-product” only, as this leads to further processing to meet established safety standards. The emphasis on food safety, which focuses only on the end product and not on the safety of the whole system, reinforces this implication that packaged and industrial food is the best option.

We propose to have risk-based approach rather than hazard-based approach because different production, commercialization and marketing systems have profoundly different risks that require different responses. Understanding cultures, values and tradition is essential to manage food safety, particularly in informal settings.

As we have pointed out before, the issue of safety must not only contemplate the micro-organism approach to protect those consuming from pathogens but must enter into the holistic consideration of what is meant by safe. This should integrate the aspects of excess of critical nutrients, additives, chemicals (e.g. pesticides, chemical fertilizers). Safety must also be related with damage to the environment and the planet in the process of food production as well as the agricultural/food workers exposed to pesticides. Therefore, assessment of the risks of pesticide use for producers, consumers and the environment have to be included. References to Anti-microbial resistance (AMR) should also be strengthened as it reflects safety from a systematic approach (human and planetary health)

A particular emphasis should be directed to the current pandemic, in the sense that it is precisely the current food systems that are responsible for zoonosis like the one we are experiencing. On the one hand, due to the fragility of ecosystems and biodiversity, and on the other, due to the effects of intensive livestock farming and extensive monocultures.

Finally, the concept of “safety” should not only include discussions on Codex Alimentarius, which is a code for international trade, and not a safety criterion per se. Discussions during the Regional Consultations have included the fact that most of localized small-scale food production often cannot meet such standards and are therefore marginalized. The Guidelines should include recommendations on how to re-visit safety in order to facilitate access to these products, as they are the ones which contribute to healthy and sustainable diets. The issue of safety should go in hand with the assessment of sweeteners, colorants, preservatives and flavor enhancers and should be regulated by the precautionary principle. This is in direct line with the application of a warning front label and should be included in strategies to preserve harmlessness.

41. Food safety touches upon all parts of the food system and is critical to prevent food-borne pathogens, hazards and illness, as well as transmission or contamination of naturally occurring toxins, pesticides, antibiotics and heavy metals. Food cannot be considered nutritious if it is not safe, and poor food safety hinders the adoption of healthy diets. There is an increased urgency to improve the ability to track food safety to help monitor the food supply flow, better connect producers to consumers, and facilitate food recalling and withdrawal across coordinated networks. This section highlights the need for global and national cooperation on food safety and for every stakeholder to be responsible and accountable for the sourcing, handling, and quality control of food because of the potential spread of food-related illness.

It is important to add references to Antimicrobial Resistance (AMR) as a critical emerging issue concerning both human and environmental health.<sup>45</sup> Food safety should also look into AMR as being derived from not only misuse within human health and waste into the environment, but also due to intensive production systems using mass medication not only for growth promotion but also as a routine disease prevention. Here again we can see a link with current industrial productive model and food system having a direct impact into environmental and human health.

Food safety once again, cannot be seen with the single perspective of microbial contamination within individual food products, but in a broader and systemic perspective.

References to the FAO/OIE/WHO Tripartite Collaboration on AMR should be included in this respect within section 3.4.1 and its related IACG report which contain 14 recommendations including for food security.<sup>46</sup>

### 3.4.1 Adopting national and international cooperation on food safety

The recommendation that governments that define food safety standards should involve ALL producers and processors as inclusive as possible in the development of these standards in order to develop realistically applicable standards for them should be included. Small scale food producers and small businesses should also be supported in achieving these standards or context-specific solutions should be developed with them.

The consumers' constituency should also be represented in the discussions on defining food safety standards.

- a) Governmental actors should **promote food safety within their food systems policies or develop food safety policies** that consider actions across the entire food systems - concerning production, processing, handling, preparation, storage, and distribution of food.
- b) Governmental actors should **develop, establish, strengthen and enforce, as appropriate, food control systems**, including reviewing, adopting, modernizing and enforcing national food safety legislation and regulations to ensure that food producers and suppliers throughout the food supply chain operate safely. Considering the centrality of the Codex Alimentarius Commission on nutrition and food safety and quality, Governmental actors should implement, as appropriate, internationally adopted Codex standards at the national and sub-national levels.
- c) Governmental actors and the FAO/WHO International Food Safety Authorities Network (INFOSAN) should participate in, share and contribute data and evidence to **international networks that exchange food safety information**, including the surveillance of foodborne hazards and disease

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<sup>45</sup> UNEP (2016). UNEP Frontiers 2016 Report: Emerging Issues of Environmental Concern. United Nations Environment Programme, Nairobi.

<sup>46</sup> IACG (2019). Report to the Secretary-General of the United Nations: No Time To Wait: Securing The Future From Drug-Resistant Infections. [https://www.who.int/docs/default-source/documents/no-time-to-wait-securing-the-future-from-drug-resistant-infections-en.pdf?sfvrsn=5b424d7\\_6#page=4](https://www.who.int/docs/default-source/documents/no-time-to-wait-securing-the-future-from-drug-resistant-infections-en.pdf?sfvrsn=5b424d7_6#page=4)

outbreaks and management of emergencies to improve food safety across a range of issues such as pesticide residues, antimicrobial residues, endocrine disrupters, chemical and unsafe food additives, pathogenic bacteria, viruses, parasites, and fraud/adulteration of food products.

#### 3.4.2 Ensuring food safety across food production systems

- a) Governmental actors and private sector actors should **consider a One Health Approach**<sup>47</sup> to food safety along the entire food and feed chain, recognizing the interconnection between food safety and human, plant, animal and environmental health.
- b) Governmental actors, in collaboration with intergovernmental organizations, should **develop and implement national guidelines on the prudent use of antimicrobials in food-producing animals** according to internationally adopted standards, relevant to World Trade Organization/Sanitary and Phytosanitary (WTO/SPS) agreements and Codex ad hoc Intergovernmental Task Force on Antimicrobial Resistance, to reduce the non-therapeutic use of antimicrobials and to phase out the use of antimicrobials as growth promoters.

#### 3.4.3 Protecting consumers from food safety risks in food supplies

- a) Governmental actors, private sector actors, and development partners should **promote and enhance traceability in food supply chains**, early contamination detection, and leverage the opportunities that new technologies offer for traceability solutions.
- b) Investment by private sector actors and donors should be made to **train food producers, handlers and preparers** and adopt scientifically, risk-based practices that can provide safe food while retaining their nutrient content.
- c) Governmental actors should understand and evaluate risks and unintended consequences and **manage new food products** created by emerging technologies (e.g. lab grown meats, and gene edited products, etc.) as appropriate depending on scientific risk assessments and Codex standards, where available, as with any new food product in international regulatory frameworks.

### 3.5 SOCIAL RELATIONS, KNOWLEDGE AND CULTURE OF DIETS

42. It is important to consider and protect the range and diversity of food cultures, social norms, relations, and traditions that contribute to healthy diets without undermining progress in gender equality. This section outlines the policy entry points to improve access to knowledge, awareness, education, and the quality of information available to people on nutritious food, healthy diets and nutrition as a way to empower people and key actors across food systems, and improve places in which people access food in their daily lives.

Access to awareness and education is seen as a solution to change “consumer behaviour” influenced by choice while this is often not the case because consumer choices and behaviours are shaped by

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<sup>47</sup> One Health is an approach to designing and implementing programmes, policies, legislation and research in which multiple sectors (such as public health, animal health, plant health and the environment) communicate and work together to achieve better public health outcomes. Reference: <https://www.who.int/features/qa/one-health/en/>

structures and environments beyond their control. This should be acknowledged to change the structures and environments rather than consumer behaviours.

Context-specific interventions and promotion of traditional diets and knowledge originating from diverse food systems are vital to ensuring equitable, positive and sustainable impacts on nutrition and the environment.

### 3.5.1 Utilizing policies and tools to provide education and information on healthy diets

Education and information should also include sustainability criteria, not only health aspects. Furthermore, the social determinants of malnutrition should also be part of information-sharing on healthy diets. This is tightly linked to human-rights learning.

- a) Governmental actors should **develop national food-based dietary guidelines** for different age groups that define context-specific, diverse, healthy diets by taking into account social, cultural, scientific, economic, ecological and environmental drivers.
- b) Governmental actors should **develop nutrition standards and restrict marketing** (including digital marketing), promotion and sponsorships exposure, especially of children aged 18 or younger, to foods high in energy density with minimal nutrition value and sugar-sweetened beverages, in accordance with multilaterally agreed rules and national legislation, where applicable.
- c) Governmental actors should **regulate the marketing of commercial infant formula** and other breast-milk substitutes and implement the International Code of Marketing of Breast-Milk Substitutes<sup>48</sup> and subsequent WHA resolutions.
- d) Governmental actors should **regulate nutritional labelling and consider front-of-pack labelling (FOPL)** to promote healthy diets. The FOPL system should be aligned with national public health and nutrition policies and food regulations, as well as relevant WHO guidance and Codex guidelines. The FOPL system should comprise an underpinning nutrient profile model that considers the overall nutrition quality of the product or the nutrients of concern for NCDs (or both). Complementary policies could be considered for foods of high energy density with minimal nutritional value to not be sold or marketed in public places or near schools, including kindergartens and child care facilities.

In keeping with the current guidance in the WHO Framework for Ending Childhood Obesity, “interpretive” front-of-pack labelling should be recommended. There are many non-interpretive FOPL that have been developed by the industry or governments and they have been proven to be ineffective, over 28 peer reviewed studies demonstrate their lack of impact. Codex is also considering the use of the term “interpretive” in their guidelines on FOPNL. Warning labels were rightfully mentioned in the previous draft of the VGFSyN and should continue to be referred to as a good practice to follow. Warning label initiatives has been lauded by FAO,

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<sup>48</sup> [International Code of Marketing of Breast-Milk Substitutes](#). WHO, 1981. Geneva.

PAHO, UNICEF and others as an example for other countries to follow and a recent article on the impact of Chilean warning labelling demonstrates that the Chilean law that mandates warning labels (and the prohibition of marketing and school sales of foods with such labels) has led to a substantial reduction of purchases of SSBs and other categories of ultraprocessed food products (Taillie et al. 2020 in PloS). Thus, the use of the word interpretive and the inclusion of the mention of warning labels should be considered in the draft.

Furthermore, considering the unprecedented success of the comprehensive Food Labelling and Marketing Law in Chile which uses the FOPNL system to determine which foods can be marketed and sold in schools, the VGFSyN guidelines could include text in 3.5.1.d stating that Governments should consider comprehensive policy guided by a strong FOPNL warning label, such that marketing to children and the sale of foods in schools is limited to those foods and beverages without warning labelling.

- e) Governmental actors should provide incentives to private sector actors to **design food markets, restaurants, and other places** where food is sold or served by encouraging the placement and promotion of foods that contribute to healthy diets in retail spaces.
- f) Governmental actors, UN agencies, NGOs, and medical and health practitioners should consider **coupling nutrition education and counselling** to populations participating in maternal and child nutrition programmes.
- g) Governmental actors, UN agencies, NGOs, and medical and health practitioners should **promote social and behavior change communication (SBCC)** and social support interventions as a way to positively influence knowledge, attitudes and social norms, and coordinate messaging on nutrition across a variety of communication channels to reach multiple levels of society (e.g. mass media campaigns).
- h) Governmental actors, intergovernmental organizations including UN agencies, preparers of food, and private sector actors should educate all food system actors 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.

### 3.5.2 Encouraging local food knowledge and culture

- a) Governmental actors, civil society organizations, and UN agencies should use evidence-based as well as cognitive, cultural, and plural knowledge resources to **promote education and knowledge** of healthy diets, physical activity, food waste prevention, intrahousehold food distribution, food safety, optimal breastfeeding and complementary feeding, taking into consideration cultural and social norms and adapting to different audiences and contexts.
- b) Governmental actors, civil society organizations, community leaders, social workers, and health professionals should **encourage food culture** and the importance of food in cultural heritage, culinary skills and nutrition literacy among communities. This can be



done through community and consumer associations and educational institutions, targeting men and women.

- c) Governmental actors should **protect and promote the knowledge that Indigenous Peoples** have with regard to local traditions and methods of producing, preparing, and preserving food that imparts nutritional and environmental benefits.

Food systems and sustainable healthy diets needs to deeply be rooted in social knowledge, including experiential, traditional and indigenous knowledge. While scientific-knowledge is obviously important, it also needs to be screen with rigorous assessments that ensure its trustworthiness and freedom from conflicts of interest

### 3.5.3 Promoting “hubs” for nutrition knowledge, education and information

- a) Universities and schools should **institute a nutrition curriculum** for all medical, nursing, and agriculture and food technology students during training.
- b) Governmental actors, civil society organizations and UN agencies should **promote culinary skills** among school-age children, adolescents and adults (including promoting communal mealtimes, socializing around food, consuming healthy diets, and reducing food waste) in schools, workplaces and community centres.
- c) Governmental actors should **adopt and implement comprehensive school food and nutrition policies**, review education curricula to incorporate nutrition principles, involve communities in promoting and creating healthy food environments and healthy diets in schools, and support school health and nutrition services.
- d) Governmental actors, intergovernmental organizations, NGOs, and civil society organizations should **engage in nutrition dialogues with communities** by drawing on the knowledge, experience and insights of individuals who are not usually regarded as members of the nutrition community (e.g. community and religious leaders, chefs, supermarket buyers, influencers on social media, youth leaders, farmers and food producers, young entrepreneurs, mayors and local communities).

## 3.6 GENDER EQUALITY AND WOMEN’S EMPOWERMENT ACROSS FOOD SYSTEMS

A specific section on women must not replace a transversal women’s rights perspective across all sections of Part 3.

Women’s rights should be strengthened in this section as it is silent on the central role of unequal power relations and gender violence in causing malnutrition. It falls short of concrete measures aimed at transforming established gender relations, stereotypes and roles, and addressing existing inequalities and violations of women’s rights. The burden of cooking, feeding and caring for family members is unfairly put on women and girls only, many times to the detriment of their own autonomy. Maternity protection should be specifically mentioned as critical measure in creating an enabling environment to promote breastfeeding. Enabling parental leave for both women and men are important measures for re-distribution of care work related to children.

We have within CSA other recommendations from other political processes like “Sustainable agricultural development including livestock”, that include the recognition of the importance of women rights, so we can’t lose this perspective in these guidelines. We agree that Empowerment is important but rights are the main pillars for it. In this situation with Covid19 it’s becoming evident how women’s right are more important than ever.

Gender analysis must always include fulfilment of rights of people whose gender identity may be subject to exclusion or discrimination.

43. Gender relations and cultural norms are among the most significant drivers of healthy diets and nutrition outcomes. In many countries, women produce food, make decisions about the household’s diet and, as primary caregivers, and influence the family’s nutritional status. Women are important agents of change for sustainable development, not only as food system actors, but also as actors in their households, communities and overall society. At the same time, women have an unequal household labour burden that should be addressed. Therefore, women’s and girl’s empowerment through education, information and access to resources and services is key to improving nutrition. This section highlights the importance of improving women’s wellbeing, ensuring access to financial, technical and biophysical resources, improving agency, voice and status, and challenging the power relationships and legal impediments that limit equality and choices.

### 3.6.1 Empowering women

- a) Governmental actors should **pass laws that promote equal participation** between women and men in political decision-making, supporting women with specific attention to rural 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.
- b) Governmental actors should **promote an enabling environment to generate cultural changes towards gender equality** with specific policies, programmes, institutions and advocacy campaigns to deal with the various forms of discrimination and violence women face.  

States should support efforts of redistributing care work so that men and boys take responsibility for their due share. The role and capacities of men in promoting sustainable healthy diets should also be promoted so that responsibilities do not fall into the burden of women’s shoulders only.
- c) Governmental actors and intergovernmental organizations should **increase adolescent girls’ and women’s human capital** by ensuring they have access to education, literacy programmes, health care, and other social services as a way to increase household nutritional status.  

Measures proposed should, moreover, be cautious to not reinforce unequal gender roles and power relations.

### 3.6.2 Promoting and acknowledging women as food system entrepreneurs

This title is misleading, as this section should be crucial to clearly recognize the invaluable contributions of women to the protection and regeneration of nature in food systems by producing, preserving and increasing popular knowledge about domestication of plants and animals, nutrition, genetic improvement and conservation of ecosystems. Therefore, upholding women's rights to land, water, fisheries, forests, seeds, breeds and to equal decision making about every aspect of social, economic and political life, is fundamental for healthy, sustainable and just food systems.

- a) Governmental actors should **ensure women's equal tenure rights** and promote their equal access to and control over productive land, natural resources, inputs, productive tools, and access to education, training, markets, and information in line with the CFS VGGT.
- b) Governmental actors, private sector actors, and intergovernmental organizations should **enhance women's roles in agriculture** by giving women decision-making power over what they choose to produce, and how they choose to produce those crops/food. Women should be offered equal levels of access to 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 entrepreneurial opportunities across food systems.
- c) Governmental actors, NGOs and private sector actors should **promote and increase access to labour and time saving technologies**<sup>49</sup> that could help improve the livelihoods of women.
- d) Governmental actors and private sector actors should **facilitate women's equal access to entrepreneurship and employment opportunities** across food systems and related activities to generate income and increase their participation in decisions on the use of household income and build and manage savings without reinforcing unequal gender roles. This would include household and business budget training, decision-making skill development, scaling of financial services and products both accessible and relevant to women's needs, and tools to help men and women strengthen their intra-household communication.

We would like to suggest to take off "household" budget training. Women's problems don't come for not be trained in household management. We think that CFS would never recommend trainings like this for men so from an equal perspective we think that this is not acceptable for women.

### 3.6.3 Recognizing women's nutritional status and deprivation

- a) Governmental actors, intergovernmental organizations, NGOs, and development partners should **pay specific attention to the nutritional well-being of adolescent girls and women** and provide health and nutritional care and services through various sectors. This can be done by ensuring that national development strategies are driven by gender analyses, and that those

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<sup>49</sup>These include 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 crops/food and raising small ruminants and poultry.

women and adolescent girls with compromised nutritional status and higher levels of deprivation, are the recipients of social protection policies and benefits.

- b) Acknowledging the significant time and work burden of women in the preparation of nutritious meals, and their roles in agriculture and food production, governmental actors should **recognize and value the importance of unpaid care work** at the household level through the effective implementation of protective laws, social protection programmes, and other benefits, and should enable gender-equitable distribution of care work. The equal participation of men in unpaid work should be promoted, especially where women are also active in productive labour.
- c) Governmental actors should create an enabling legal framework and supportive practices to **protect and support breastfeeding**, ensuring that decisions to breastfeed do not result in women losing their economic security or any of their rights. This should include implementing maternity protection legislation, including entitlement to publicly-funded paid maternity leave (or paternity leave), and removing workplace-related barriers to breastfeeding (lack of breaks, facilities, and services).

### 3.7 RESILIENT FOOD SYSTEMS IN HUMANITARIAN CONTEXTS

This is one of the points that merits the postponement of the negotiations, and the expansion of the spaces for negotiation, since the present time has changed the perspective of "disasters" and the concept of resilience more than ever is placed under new readings.

The COVID related crisis exposed the systemic interconnection between health, food, social services, economic performance and financial stability, among others. The crisis served to remind us, once again, that we need systemic analysis and equally systemic responses, rather than locking policy domains into silos. In this sense, this section should not be considered as the place where we draw the implications of COVID.

44. Linking food security and nutrition interventions during humanitarian crises (man-made and climate-related disasters) with longer-term strategies to strengthen the resilience of food systems is key.

This section should not be only about humanitarian aid, but equally, about observing the provisions of international humanitarian law in terms of prohibitions against the destruction of agricultural areas, irrigation works and drinking water systems, safe and decent livelihood opportunities among others— i.e., destruction of the central elements of sustainable food systems.

Short or protracted crises are often brought on by conflict and climate change, displacing millions which increases their risk of food insecurity and malnutrition. Considering the importance of resilient food systems, this section highlights the importance of strengthening the nexus between humanitarian and development programming and builds upon the 11 principles in the CFS Framework for Action for Food Security and Nutrition in Protracted Crises (FFA)<sup>50</sup>.

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<sup>50</sup> CFS Framework for Action for Food Security and Nutrition in Protracted Crises

### 3.7.1 Protecting the most vulnerable to malnutrition in humanitarian contexts

- a) Governmental actors and humanitarian organizations should pay particular attention, protection, and **facilitate access to nutritious food and nutritional support to most vulnerable and marginalized groups.**
- b) Governmental actors 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 and other UNGA Resolutions after 1949.
- c) Governmental actors, 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.

### 3.7.2 Improving the quality of food and nutrition assistance

- a) Governmental actors, all parties involved in conflicts, climate-related disasters and food assistance, including humanitarian organizations, should **ensure that food security and nutrition assessments and analyses** (such as the Integrated Phase Classification System) are undertaken throughout a crisis to inform the food and nutrition response as well as any components of the local food system requiring rehabilitation.

Humanitarian aid can potentially impact Food Systems and food cultures, hence the need for safeguards.

These assessments should adhere to internationally accepted methods, and be impartial, representative, gender-sensitive and well-coordinated with governments.

- b) Governmental actors should recognize nutrition as an essential need and humanitarian assistance should **aim to meet nutritional requirements of the affected population**, particularly the most vulnerable to malnutrition. Any food items provided should be of appropriate nutritional quality and quantity, be safe and acceptable, and not harm local markets. Food must conform to the food standards of the host country's government in line with the Codex Alimentarius standards about food safety, quality, and labelling.
- c) Governmental actors and humanitarian assistance organizations should be encouraged to **purchase locally produced, fortified food** (including Ready to Use Supplementary and Therapeutic foods in some contexts) and ensure they are available through social protection mechanisms and acute malnutrition management programmes, with improved coverage during times of crisis. Fortification should be used only in limited times and places and should not disrupt local market and accessibility of nutritious food in the longer term.

It needs to be explicitly clear that this is only to be used in very specific acute circumstances (famine) and that the priority is ensuring micro-nutrients through diverse, healthy, sustainable diets. Fortified food must not be considered as a long-term solution regarding malnutrition.

- d) Governmental actors should **have an explicit policy on infant and young child feeding (IYCF) in emergencies**, and governmental actors, UN agencies and NGOs should ensure that such policies on IYCF practices are implemented, coordinated, 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 for all stages of the lifecycle.

Governments should implement specific policies to restrict donations and financial or in-kind contributions from ultraprocessed food and beverage companies during emergencies.

### 3.7.3 Ensuring food systems are resilient in humanitarian contexts

A resilient food system implies concrete conditions of work, production, supply, etc. We know that there are regions whose food systems are disrupted by natural disasters (effects of climate change) as well as wars and armed conflicts etc. The consequences of catastrophic climate change have destroyed the livelihoods of indigenous and local populations, who include agro-pastoralists, fisher-folk, smallholders and rural workers. Further, hundreds of thousands of people are displaced or refugees in neighbouring countries fleeing insecurity and human rights violations.

We would suggest adding a paragraph on state failure. We know that in several regions of the world, states have failed to meet even the most basic needs of population groups and/or to enabling them to take control of their own welfare in times of crisis; instead, these groups have been left in a permanent dependence on aid, despite the opportunities for productive activities. Governance that is unsuited to the traditions and customs of indigenous peoples has destabilized good traditional and social management practices, leading both to the inadequacy of basic social services, which are highly inadequate, and to the creation of a climate of inter-community mistrust.

Marginalized groups should be able to assume responsibility for resource management in their food systems – including adaptation to crises and natural disasters—and governments should support these capacities.

Food security and nutrition assessments and analyses should not be limited to humanitarian actions alone, but should also highlight the level of economic recovery, the state of resources and the opportunities to be developed in the regions, including the knowledge of local populations in relation to the strengthening of local food systems. It is therefore key to strengthen the right to food and not to fall into “charity” approaches.

- a) Governmental actors in partnership with relevant organizations should **develop and use early warning systems, climate information services, and food and agriculture information systems** that detect and monitor threats to food production, availability and access as well as food safety and tampering. These early warning systems should be integrated into broader food analysis systems including the monitoring of the availability and affordability of nutritious foods that contribute to healthy diets at the local level.
- b) Governmental actors, development partners and donors should **invest in disaster risk reduction measures** that benefit those most at risk/need. In particular, productive assets should be protected from severe weather and climate impacts in a way that strengthens the resilience of affected populations and their ability to cope with shocks due to conflicts and climate -related disasters. Governmental actors should aim to restore local food production and market accessibility as rapidly as possible.
- c) Intergovernmental organizations particularly the UN agencies and development partners should **use local organizations in the implementation of humanitarian food assistance** and livelihood programmes to support economic recovery and development, strengthen sustainable local food systems and foster the ability of smallholders and/or family farmers to access resources to bolster production and markets.

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

The guidelines will only ever be as strong as the accountability mechanisms behind them. The actions outlined in the guidelines should be ensured that they are acted on by governments.

The conflict of interests is not sufficiently addressed in the guidelines, which currently do not fully describe or recognise the challenges around commercial influence.

Instituting accountability mechanisms, monitoring and evaluation should create a transparent, accountable and democratic food system.

In this sense, the voluntary nature of the guidelines may be a limiting factor and may affect the commitment of certain actors; voluntary guidelines have been shown to be weak leavers for change against commercial interests. Legally binding actions, for example those based on human rights legislature, or packaged under a framework convention should also be considered. The guidelines should reference obligations in national and international law more explicitly.

The Monitoring of the Guidelines should refer to existing frameworks such as the work done on the Right to Food Monitoring/ Indicators by FAO<sup>51</sup>. In addition, the principles for the assessment framework towards sustainable food systems should be linked to the principles defined in the CFS Global Strategic

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<sup>51</sup> FAO (2009): Methods to Monitor the Human Right to Adequate Food Volume I <http://www.fao.org/3/a-i0349e.pdf>

Framework for Food Security and Nutrition (GSF) for monitoring and accountability systems. These have already been agreed by Member States and indicate that they should:

- *Be human rights based, with particular reference to the progressive realization of the right to adequate food;*
- *Make it possible for decision-makers to be accountable;*
- *Be participatory and include assessments that involve all stakeholders and beneficiaries, including the most vulnerable;*
- *Be simple, yet comprehensive, accurate, timely and understandable to all, with indicators disaggregated by sex, age, region, etc., that capture impact, process and expected outcomes*
- *Not duplicate existing systems, but rather build upon and strengthen national statistical and analytical capacities.*

We think that these two additional references should be considered when agreeing about principles for an assessment framework while envisaging the monitoring of the Guidelines (refer also to comment on Guiding principles).

#### 4.1 POLICY FORMULATION AND IMPLEMENTATION OF THE VGFSyN

49. 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 coordinated and multisectoral national policies, laws, programmes and investment plans.

50. The VGFSyN are intended to **support the implementation of the UN Decade of Action on Nutrition 2016-2025** with the objective of increasing the visibility, coordination and effectiveness of nutrition actions at all levels, as key aspects toward the realization of the 2030 Agenda for Sustainable Development.

51. Governmental actors are invited to use the VGFSyN as a tool to undertake new initiatives toward the transformation of food systems to make them more sustainable and capable of delivering healthy diets. These include **identifying policy opportunities, fostering a transparent and open dialogue, promoting coordination mechanisms, and establishing or strengthening existing, multistakeholder platforms, partnerships, processes and frameworks**, such as the Scaling Up Nutrition (SUN) Movement.

52. Parliamentarians and their regional and sub-regional alliances have a key role in **promoting the adoption of policies, establishing appropriate legislative and regulatory frameworks**, raising awareness and promoting dialogue among relevant stakeholders, and allocating resources for the implementation of laws and programmes dealing with food systems and nutrition.



## 4.2 BUILDING AND STRENGTHENING CAPACITY FOR IMPLEMENTATION

53. Governmental actors, supported by donors and financing institutions, need **to mobilize adequate financial, technical and human resources** to increase the human and institutional capacity of countries to implement the VGFSyN and to identify priorities toward their operationalization and monitoring at the national and local levels. Technical agencies of the UN, bilateral cooperation and other financing mechanisms can assist in this regard. The organization of multistakeholder workshops and training, as well as the development of user-friendly and technical guides, deployed via extension services and digital means, are important to contextualize and adapt to local contexts.

54. 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' endeavours. The VGFSyN should contribute to the design of investments that aim 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, as well as to promote the integration of sustainable agriculture and food system dimensions into nutrition and health investment plans.

55. Development partners, technical agencies of the UN, including the Rome-based Agencies, and regional organizations are encouraged to **support efforts by Governmental actors** to implement the VGFSyN. Such support could include research and 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 and regional policies. Actions should be taken to improve partners' capacity to design, manage and participate in multistakeholder partnerships, to ensure transparency and accountability and promote good governance for effective results. Moreover, UN interagency coordination mechanisms for nutrition could be leveraged to support the uptake of the VGFSyN at country level.

56. National and international research organizations, academic institutions, and universities should **provide the knowledge, innovation, science, and evidence on all dimensions of food systems** (including citizen/consumer demand and behaviour change) to enable governmental actors and other food system stakeholders to examine the evidence, prioritize issues to be considered, evaluate impacts, and address potential trade-offs.

57. The dissemination and uptake of the VGFSyN can be facilitated through the **identification of "champions" and "change agents"**, especially among civil society, who could raise awareness across sectors and different governmental levels, and the organization of advocacy campaigns at different levels.

## 4.3 MONITORING OF THE USE AND APPLICATION OF THE VGFSyN

Clear reference should be made to the guiding principles, especially 32c) "accountability, transparency and participation". Such monitoring processes should be inclusive, participatory and gender sensible (refer to VGGT, 26.2)

**Governments (duty bearers), in inclusive and participatory consultation with claim holders, especially marginalized groups in the food systems, should develop new indicators for assessing food systems which evaluate their contribution to healthy and sustainable diets, conservation of natural resources, social justice, equity and cultural respect.**

58. Governmental actors, in consultation with relevant stakeholders, should **define national policy priorities and related indicators and establish or strengthen existing monitoring and reporting systems** in order to assess the efficiency of laws, policies and regulations, and implement appropriate remedial actions in case of negative impacts or gaps.

59. By implementing the VGFSyN, governmental actors are expected to **contribute to the achievement of the six Global Nutrition Targets (2025)** endorsed by the WHA in 2012<sup>52</sup> **and its diet related NCD targets**<sup>53</sup>. The VGFSyN should support countries in defining priority actions and formulating “SMART” commitments<sup>54</sup> in order to achieve nutrition objectives as well as to promote the creation of informal coalitions of countries to accelerate and align efforts around specific topics linked to one or more action areas of the Nutrition Decade and the 2030 Agenda. This can be done through advocating for policies and legislation, allowing the exchange of practices and experiences, highlighting successes and lessons learned, and providing mutual support to accelerate implementation.

60. CFS should include the VGFSyN in its ongoing work on monitoring, relying as much as possible on existing mechanisms. **CFS should organize a Global Thematic Event** where all relevant stakeholders can learn from the experiences of others in applying them and assess their continued relevance, effectiveness and impact on food security and nutrition.

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<sup>52</sup> <https://www.who.int/nutrition/global-target-2025/en/>

<sup>53</sup> <https://www.who.int/beat-ncds/take-action/targets/en/>

<sup>54</sup> In the context of the UN Decade of Action on Nutrition and ICN2 follow-up process, country commitments for action should be specific, measurable, achievable, relevant and time-bound. [https://www.who.int/nutrition/decade-of-action/smart\\_commitments/en/](https://www.who.int/nutrition/decade-of-action/smart_commitments/en/)