

Switzerland - Specific comments per paragraph

Text Draft for Negotiation	Comments – suggested text proposals
PART 1 - INTRODUCTION	
1.1 Background and Rationale	
<p>4. Overweight and obesity represent major risk factors globally for diet-related NCDs such as some forms of cancer, cardiovascular disease, <u>chronic respiratory diseases</u> and diabetes. While undernutrition and micronutrient deficiencies are still the main forms of malnutrition among children under the age of five years globally, <u>overweight and obesity are increasingly prevalent among young and school-aged children, adolescents and adults, and are increasing in every region, with rural areas catching up to urban settings.</u></p>	<p>Active:</p> <ul style="list-style-type: none"> • Add «chronic respiratory diseases» as important aspect of overweight and obesity. • Delete second sentence to make text more reader-friendly • Add last sentence as stated in SOFI 2019 report.
<p>5. The heavy social and economic impacts of malnutrition in all its forms are transmitted across generations. Under-malnourished mothers are more likely to have low-birth-weight babies putting them at an increased risk of becoming Under-malnourished 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.</p>	<p>Active: Risk factors for low-birth-weight babies are not limited to undernutrition (calories), but also malnutrition more broadly (diet diversity, micro-nutrients). Wording should therefore change to back to “malnutrition”.</p>
<p>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, <u>subsistence farmers</u>, 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</p>	<p>Active: Add subsistence farmers to the listing.</p>

<p>temporary poverty.</p>	
<p>9. Complex and protracted crises² 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 <u>natural and climate-change-related disasters</u> pose a major threat to the ability of food systems to deliver <u>sustainable and</u> healthy diets and to the implementation of the 2030 Agenda for Sustainable Development as a whole.</p> <p>² 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</p>	<p>Active:</p> <ul style="list-style-type: none"> • Natural disasters are not limited to climate-related disasters (earthquake, tsunami, volcanic eruption, monsoon..) and most disasters are climate-change and not uniquely climate-related • Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).
<p>10. Climate change, agriculture³, food 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 <u>sustainable and</u> 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.</p> <p>³ Agriculture includes crops, forestry, fisheries, livestock and aquaculture. UNGA Resolution A/RES/74/242. Paragraph 20</p>	<p>Active:</p> <ul style="list-style-type: none"> • Include “food”, as food is an interconnected part with agriculture and nutrition. • Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).
<p>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 <u>and processed</u> 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. <u>An individual’s food choices have impacts that resonate far beyond themselves: diets reflect</u></p>	<p>Active:</p> <ul style="list-style-type: none"> • Reintegrate [and processed]. Processed food should be an important part of these VGFSyN • Switzerland suggests to re-introduce the last sentence of Draft One on the far-reaching impact of individuals choices on sustainability and societal aspects, at the same time we should acknowledge the limited control of individuals on their food choices. The responsibility of healthy and sustainable food choices is not entirely at the individual level as it is to a large degree influenced

<p><u>larger systemic issues that impact population, health, sustainability, and justice. At the same time individuals have limited control over their food choices as it is to large degree influenced by the societal and food system environment</u></p>	<p>and defined by the environment of the individual (food accessibility, affordability, availability etc.).</p>
<p>12. Food systems⁴ 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 <u>all relevant stakeholders</u> many different individuals. Every food system has the capacity to be equitable and to produce <u>sustainable and</u> 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. <u>Changes are needed within and across food systems, with the aim to generate positive outcomes along the three dimensions of sustainability – social, economic and environmental.</u></p> <p><i>⁴“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.</i></p>	<p>Active:</p> <ul style="list-style-type: none"> • Delete “many different individuals” as this is unclear. • Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24). • Integrate last sentence: sustainability dimensions are important to be mentioned in this context. • Delete footnote to “food system”, need to be integrated in key concepts as these guidelines are on food systems and nutrition. The concept of food systems has to be defined under the key concepts.
<p>13. The functionality of food systems and their ability to deliver <u>sustainable and</u> 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.</p> <p>⁵HLPE. 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.</p>	<p>Active: Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).</p>
<p>14. Transforming food systems and promoting sustainable food systems⁶ that meet the dietary needs of populations require <u>policy, institutional and behavioural changes</u> 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</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “policy” as important aspect of these guidelines. • Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).

<p>food for <u>sustainable and</u> healthy diets.</p> <p>⁶“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</p>	
<p>16. Coordination processes are required to address policy fragmentation and its subsequent <u>negative impact on sustainable food systems and nutrition</u> across sectors such as health, agriculture, education, environment, water, sanitation, gender, social protection, trade, employment, and finance – all of which impact nutrition <u>and food system</u> outcomes.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add reference on negative impacts on sustainable food systems and nutrition through policy incoherence. • Add food systems, as the guidelines do not only talk about nutrition outcomes but are guidelines on food systems.
<p>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 Security and Nutrition’s (HLPE)¹⁰ Report on Nutrition and Food Systems, additional literature, as well as a regional consultations process that took place between May and November 2019 which involved the participation with of CFS stakeholders <u>as well as</u> in meetings in Italy, Ethiopia, Thailand, Hungary, Egypt, Panama, and the United States of America, as well as through an electronic global consultation.</p> <p>¹⁰ 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.</p>	<p>Active: please revise the last sentence for better readability</p>
<p>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 <u>have</u> <u>are</u> receiving 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 forms¹¹. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025)¹² and called upon FAO and WHO to lead its implementation, in collaboration with the World Food Programme (WFP), the International Fund for Agricultural Development</p>	<p>Active: Paragraph can shortened again (as highlighted) to make the text more readers friendly. We suggest to delete the listing and keep the references in the footnotes.</p>

<p>(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)¹³. Specific attention to nutrition has been given by a number of UNGA Resolutions¹⁴, the UN Economic and Social Council (ECOSOC)¹⁵, the UN Environment Assembly¹⁶, the World Health Assembly (WHA)¹⁷ and the UN Special Rapporteur on the Right to Food¹⁸.</p> <p>¹¹ FAO/WHO. 2014. ICN2, Rome Declaration on Nutrition.</p> <p>¹² UNGA Resolution A/RES/70/259 - The Work Programme of the UN Decade of Action on Nutrition</p> <p>¹³ UNGA Resolution A/RES/72/239.</p> <p>¹⁴ UNGA Resolutions A/RES/73/2, A/RES/73/132, and A/RES/73/253.</p> <p>¹⁵ Ministerial Declaration of the 2018 High-Level Political Forum on Sustainable Development</p> <p>¹⁶ Ministerial Declaration of the 2019 United Nations Environment Assembly</p> <p>¹⁷ 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.</p> <p>¹⁸ A/71/282 “Interim report of the Special Rapporteur on the right to food”</p>	
<h2>1.2 KEY CONCEPTS</h2>	
<p>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 benefits²⁴.</p> <p>²⁴ Adapted from WHO healthy diet: www.who.int/news-room/fact-sheets/detail/healthy-diet</p>	<p>Active: As the Voluntary Guidelines are Guidelines on Food Systems AND/for Nutrition, the conceptual connection between sustainable production and a healthy and safe nutrition needs to be re-integrated through the key concept “sustainable and healthy”. In order to be in line with the SDGs, nutrition should to not only be healthy for humans but also healthy for the planet and should consequently be based on sustainable agricultural production. Sustainable food systems are at the heart of improved nutrition, enabling the consumption of healthy and safe diets and addressing all forms of malnutrition. The VGFSyN, therefore, need to conceptually re-connect healthy diets and sustainable food systems and take on a holistic and systemic food system approach. This is no new language as the term “healthy and balanced sustainable diets” has already been used in the Declaration General Assembly resolution A73/L2 from 10 October 2018 (Para 34).</p>

<p>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 impact²⁵.</p> <p>²⁵ Adapted from FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome</p>	<p>Active: The new wording/definition of “sustainable healthy diets” does not go far enough and hides important aspects of the concept “sustainable and healthy diets”. It diverts from the definition given in FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome. Please use wording as in Draft One (see below).</p> <p><i>“Sustainable and healthy diets “promote all dimensions of individuals’ health and wellbeing; have low environmental pressure and impact; are accessible, affordable, safe and equitable; and are culturally acceptable. The aims of sustainable [and] healthy diets are to achieve optimal growth and development of all individuals and support functioning and physical, mental and social wellbeing at all life stages for present and future generations; contribute to preventing all forms of malnutrition (i.e. undernutrition, micronutrient deficiency, overweight and obesity); reduce the risk of diet-related NCDs; and support the preservation of biodiversity and planetary health. Sustainable [and] healthy diets must combine all the dimensions of sustainability to avoid unintended consequences”</i></p>
<p>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 2017b</p>	<p>Active: Important concept in order to understand the guidelines.</p>
<p>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”¹⁶.</p> <p>¹⁶ 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.</p>	<p>Active: Important concept in order to understand the guidelines.</p>
<p>22. Nutritious foods are those foods that tend to be <i>high</i> in essential nutrients such as vitamins and minerals (micronutrients), as well as proteins, unrefined carbohydrates such as</p>	<p>Active: please add a reference of this definition in a foot note</p>

<p>fibre, and/or unsaturated fats and are low in sodium, added sugars, saturated fats and trans fats.</p>	
<p>PART 2 – OBJECTIVES AND GUIDING PRINCIPLES 2.1 OBJECTIVES AND PURPOSE</p>	
<p>24. The objective of the VGFSyN is to contribute to transforming food systems²⁷ 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 <u>respecting planetary boundaries and</u> conforming “with beliefs, culture and traditions, dietary habits, and preferences of individuals, in accordance with national and international laws and obligations”²⁸.</p> <p>²⁸ FAO/WHO. 2014. ICN2, Rome Declaration on Nutrition. Paragraph 5.b.</p>	<p>Active: Add a reference to planetary boundaries.</p>
<p>2.2 NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS</p>	
<p>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:</p> <ul style="list-style-type: none"> 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 <u>organisations</u>, including agribusiness, food and beverage manufacturers, food retailers including supermarkets, food service providers, industry trade associations, food wholesalers, food distributors, importers and exporters <u>traders</u>, and the advertising and marketing industry <u>sector</u>³⁰; f) Research organizations, academic institutions, and universities; g) Development partners, including international financial institutions; h) Private donors, foundations, and funds; i) Consumer associations. <p>³⁰The private sector is made up of many different types of companies with a wide range of sizes, scales, human and</p>	<p>Active: E) Change to “Private sector [organizations]: - the private sector organizations are key drivers of change within their sector</p>

<p>financial resources, as well as varying reach into local, domestic and international markets.</p>	
<p>2.3 GUIDING PRINCIPLES FOR TRANSFORMING FOOD SYSTEMS OR PROMOTING SUSTAINABLE FOOD SYSTEMS</p>	
<p>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.</p> <p>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.</p> <p>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.</p> <p>c) Accountability, transparency and participation. Support efforts in strengthening <u>good</u> governance, <u>including</u> 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, <u>that are</u> based on transparent rules of engagement including safeguards against potential conflicts of interest.</p> <p>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, biodiversity <u>and ecosystems services</u> and biodiversity, and ensure mitigation of and adaptation to climate change.</p> <p>e) Gender equality Equity and women’s empowerment. <u>Promote equitable access to sufficient, safe and nutritious foods that meet dietary needs and food preferences for an active and healthy life independent of their social or demographic factors such as race,</u></p>	<p>Active:</p> <ul style="list-style-type: none"> • c) add good governance • d) Ecosystem is part of biodiversity = the 3rd level beside genetic and species • e) as the VG not only contain a focus area on gender but also on equitable access, the guiding principles should not only refer to gender equality and women empowerment but more broadly to equity. Please amend according to the proposal as indicated under e).

<p><u>gender, income or geographic region</u>. 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.</p>	
<h2 style="text-align: center;">PART 3 - THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION</h2>	
<p>33. With the aim of <u>fostering the achievement of the Agenda 2030</u> and 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 <u>that food systems deliver sustainable and healthy diets for everyone</u> .</p>	<p>Active:</p> <ul style="list-style-type: none"> • We would like to see a reference to the Agenda 2030 here. • We suggest the changes as highlighted (“that food systems deliver sustainable and healthy diets”) to have the text in line with para 24 (objective of VGFSyN).
<p>34. To achieve <u>the 2030 Agenda</u>, the WHA, the <u>UNEA Ministerial Declaration</u> 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. 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.</p>	<p>Active: Put the reference to the Agenda 2030 before the WHA targets. Add reference to Ministerial Declaration, United Nations Environment Assembly 4, 2019. These guidelines should not only refer to targets in relation to healthy diets and nutrition. These are guidelines on FOOD SYSTEMS AND NUTRITION.</p>
<p>35. These guidelines are structured around seven focus areas:</p> <ol style="list-style-type: none"> i) transparent, democratic and accountable governance of food systems ii) sustainable food supply<u>ies</u> chains for improved <u>food systems</u> diets and nutrition in the context of climate change; iii) equitable access to <u>sustainable and healthy diets</u> delivered by sustainable food 	<p>Active:</p> <ul style="list-style-type: none"> • ii) food supplies is different from food supply chains since it might give the impression to focus only on the production part. We want to keep the scope of the VG Food system and nutrition. Why a specific reference to

<p>systems;</p> <p>iv) food safety across sustainable food systems;</p> <p>v) social relations, knowledge and culture of diets; <u>People-centred nutrition knowledge, education and information</u></p> <p>vi) gender equality and women’s empowerment across food systems; and</p> <p>vii) resilient food systems <u>and nutrition</u> in humanitarian contexts.</p>	<p>climate change? We might add biodiversity lost or increase of pandemics</p> <ul style="list-style-type: none"> • For “focus area iii)” we suggest to add text as highlighted, to have it in line with para 24 (objective of VGFSyN). • For “focus area v) change the title back to “People-centred nutrition knowledge, education and information” • For “focus area vii)”, we want to see [and nutrition] be included. Nutrition in protected crises / humanitarian context is important.
<p>36. The HLPE report was structured around three main constituent elements of food systems³² 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 food systems that deliver better diets and nutrition and hence the origin of these seven focus areas. The first focus area, the governance of food systems, establishes the foundation of the remaining policy recommendations of the VGFSyN <u>which underpins and cuts across the other six focus areas</u>. 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.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Delete first sentence. No need to refer in the core provision of the VGFSyN to the HLPE report and the consultation. Looks more like an explanation to the seven focus areas. Would better fit either in an additional para under Part 2 or within a foot note. • Add [<i>which underpins and cuts across the other six focus areas</i>] (see also comment under para 36).
<p>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 analyse the potential transition costs, benefits, trade-offs, and impacts of their actions, considering their effects across sectors and actors within their own context of</p>	<p>Active: Although the VGFSyN are primarily targeted at governmental actors (see Para 30), we do not agree with a stand-alone focus on responsibility of governmental actors here. Any reference to “other actors” has been deleted. Other actors, private sector, NGOs, farmers, etc. are relevant to achieve sustainable food system delivering healthy diets. Total contradiction with para 30. Please Delete</p>

environmental, economic and socio-cultural conditions and objectives.	
3.1 TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS	
3.1.1 Promoting policy coherence by integrating food systems and nutrition into national development	Active: Add food systems as lit. b) talks about food systems.
a) Governmental actors should foster policy coherence across sectors to reduce all forms of malnutrition from a food system perspective. <u>These sectors include agriculture, environment, energy, water, sanitation, hygiene, health, education, fiscal policies, trade, investment, and economic and social development.</u> Governmental actors should prioritize sustainable food systems in order to effectively align relevant sectors around a common set of goals.	Active: Add listing of different sectors, in order to gain clarity and conciseness.
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 <u>and transparent</u> objectives of improving diets and nutrition with <u>smart</u> indicators to track and assess the full cost accounting of addressing malnutrition in all its forms.	Active: Make a reference to <u>transparent</u> objectives and include a reference to <u>smart</u> indicators.
c) Governmental actors should ensure that international and bilateral trade and investment agreements are consistent with nutrition, food, <u>environment</u> and agriculture national policies, and international food safety standards (e.g. <u>Codex Alimentarius and World Organization for Animal Health standards</u>) and favour the transition towards more sustainable food systems.	Active: <ul style="list-style-type: none"> • Add <u>environmental sector</u>, in order to have a list of the most important sectors. • Put reference to Codex Alimentarius and World Organization for Animal Health standards in a footnote. • Add last part to have the much needed reference to the transition towards more sustainable food 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, <u>the UNEA Ministerial Declaration (4, 2019)</u> and the 2030 Agenda for Sustainable Development.	Active: Add reference to Ministerial Declaration, United Nations Environment Assembly 4, 2019. These guidelines should not only refer to targets in relation to healthy diets and nutrition. These are guidelines on FOOD SYSTEMS AND NUTRITION.

<h3>3.1.2 Strengthening multisectoral coordination and actions</h3>	
<p>a) Governmental actors, intergovernmental organizations and development partners should work to improve food systems, nutrition and diets 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 and sustainable food systems outcomes from national to local levels, adopted in accordance with multilaterally agreed rules.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Please make ordering as follow: food systems, nutrition and diets. • Delete last sentence. No need to repeat within the VG what is already mentioned under PART II – “Evidence and science based” (2.3) “in accordance with multilaterally agreed rules” in better and agreed language in 2.2.
<p>b) Governmental actors <u>and intergovernmental actor</u> 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, <u>as well as the protection of natural resources and the environment</u>, social cohesion and inclusion.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “and intergovernmental actors” • Add “as well as the protection of natural resources and the environment”. Need for more coherence within the VG (see for example par. 32 principle d)
<p>c) Governmental actors, intergovernmental organizations, civil society organizations, <u>development partners and private sector</u> should encourage increased commitment to action with responsible investment³⁴ from the public sector, private sector actors, and donors to support sustainable food systems that promote healthy diets <u>food systems that deliver sustainable and healthy diets</u> while considering trade-offs with other policy priorities.</p> <p><small>³⁴ In line with the CFS Principles for responsible investment in agriculture and food systems, RAI (2014).</small></p>	<p>Active:</p> <ul style="list-style-type: none"> • Private sector actor and development partners should not only be listed as recipients of this encouragement but be involved as actor to encourage these, much needed, responsible investments. • We want to see the text changed as suggested, in order to be in line with the objective of the VGFSyN (para 24) that makes reference to: “...the objective of the VGFSyN is [...] to promote sustainable food systems ensuring that the food that contributes to sustainable healthy diets is available, affordable [...] and to be in line with the title of the guidelines “food systems for nutrition”, we need to have the red text added.
<h3>3.1.3 Creating accountability mechanisms, monitoring and evaluation</h3>	
<p>a) Governmental actors should establish or strengthen regulatory and legislative frameworks</p>	<p>Active: Reference should not only be made to “related to food systems” but also the much needed regulatory and legislative</p>

<p>to govern private and public sector activities related to food systems and nutrition. 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.</p>	<p>frameworks related to nutrition. Add <u>and nutrition</u>.</p>
<p>3.2 SUSTAINABLE FOOD SUPPLIES CHAINS FOR IMPROVED DIETS AND NUTRITION IN THE CONTEXT OF CLIMATE CHANGE</p>	<p>Active: Change supplies to supply chains, in order to consistent with the HLPE report (Figure 3) that includes under food supply chains: 1) Production, 2) Storage and distribution, 3) processing and packaging and 4) retail and markets.</p>
<p>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. <u>The decisions made by the actors at any stage have implications on the availability, affordability, accessibility, acceptability, and safety of nutritious food for a sustainable and healthy diet.</u> 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.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Delete “health and environmental”. Sustainability is a concept as such. • Add sentence with regard to the implication on the availability, affordability, accessibility, acceptability, and safety of nutritious food.
<p>3.2.1 Prioritizing climate adaptation and mitigation across <u>sustainable</u> food supplies <u>chains</u></p>	<p>Active:</p> <ul style="list-style-type: none"> • Add [sustainable] and [chains] to be in line with the title of the subchapter 3.2, as well as to be consistent with figure 3 of the HLPE report.
<p>a) Governmental actors (including national extension systems), development partners, NGOs, and private sector actors should assist collaborate with farmers and other food producers to adapt to, and ensure food supply chains are resilient to, climatic shocks by managing risk and</p>	<p>Active:</p> <ul style="list-style-type: none"> • Replace the term “assist” and “assistance” by collaborate or support

<p>building preparedness and resilience. Assistance <u>This</u> 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 <u>It</u> could also include protecting crops, livestock, and fisheries and overall production systems from the anticipated impacts of climate change, <u>such as through cover crops, no-till farming and renewable energy technologies</u>, drought resistant varieties, as well as productive-asset creation initiatives (e.g. rehabilitating degraded land and infrastructure development).</p>	<ul style="list-style-type: none"> • Add reference to “through cover crops, no-till farming, and renewable energy technologies”, as these are important practices to anticipate impacts of climate change.
<p>b) Governmental actors, intergovernmental organizations, NGOs, and private sector actors should <u>collaborate with support and assist</u> 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 <u>and fertilizers</u> usage. Governmental actors <u>They</u> should promote optimization of agricultural outputs per unit of water, energy, and land, and manage the carbon footprint, reduce greenhouse gas emissions, biodiversity loss, and natural resource degradation of agriculture activities.</p>	<p>Active:</p> <ul style="list-style-type: none"> • We welcome that the list of actors has been extended compared to Draft One, this should be consistently be applied throughout the paragraph. • The formulation of “manage the carbon footprint of agriculture activities” has been deleted. We would welcome such a formulation here.
<p>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 <u>as part of environment and climate-related target-setting agendas</u> to monitor changing conditions and the effectiveness of policy responses.</p>	<p>Active: Although this is not the forum for climate change negotiations, we see climate change related questions as of utmost important for these VGFSyN. As per paragraph d) (see below) robust mitigation and resilience strategies to climate change for sustainable food systems and sustainable healthy diets is important. We therefore want to see a reference to environment and climate-related target-setting agendas here. Add text as highlighted.</p>
<h3>3.2.2 Ensuring sustainable use and management of natural resources in food production</h3>	
<p>a) Governmental actors and farmers and their organizations, <u>and other relevant stakeholders</u> should address soil health as central to agricultural production systems. Governmental actors should encourage the use of integrated soil fertility <u>and nutrients</u> management practices to maintain and increase crop productivity in a sustainable way, and provide appropriate incentives for the use of ecosystem services sustainable land management services and agricultural practices to which maintain soil biodiversity and nutrient balance and promote carbon storage.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “other relevant stakeholders”. This recommendation is not only for governmental actors and farmers and their organizations. • Add nutrient to soil fertility management practices. • Please add a reference to “ecosystem services” as per Draft One here. “Ecosystem services” changed to

	“sustainable land management services and agricultural practices”. Change text as highlighted.
<p>b) Governmental actors should <u>ensure</u> 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.</p> <p><u>These approaches should foster the reduction of water wastage in irrigation, ensure the systematic use of appropriate water-saving technologies, minimize water pollution stemming from agriculture, and promote the multiple uses of water (including wastewater) without compromising the ability of farmers and food producers to grow sufficient, nutritious food.</u></p>	<p>Active:</p> <ul style="list-style-type: none"> • «<u>ensure</u> the management and control of water resources» was changed to «<u>improve</u> the management and control of water resources”. We want to keep <u>ensure</u> instead of <u>improve</u>. • Please add last sentence as highlighted. The new reference to “water stewardship approaches” is not clear enough.
<p>c) Governmental actors <u>and other relevant stakeholders</u> should foster the protect, conserve through sustainable use protection, conservation, and sustainable use of biodiverse, productive system biodiversity for food and agriculture (BFA) 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 done complemented through the adoption and application of sustainable food production and natural resource management practices including agroecological and other innovative approaches in a manner that is economically viable for all legitimate tenure rights holders to uphold those rights and maintain livelihoods.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add other relevant stakeholders, as it is not only the task of governments. • Change to protect, conserve through sustainable use. • Change biodiverse and productive systems to “biodiversity for food and agriculture (BFA)”. BFA definition see below and reference to the SOW-BFA 2019 .
<p>d) Governmental actors should protect the rights of Indigenous Peoples, small-scale producers, and other local 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.</p>	<p>Active: Change text as highlighted, to be in line with wording in UNDROP.</p>
<h3>3.2.3 Promoting nutrition within agriculture and food production</h3>	
<p>a) Governmental actors should <u>promote nutrition-sensitive agriculture and diversified food production</u> integrate nutrition objectives into their national food and agriculture policies, including through incentives.</p>	<p>Active:</p> <ul style="list-style-type: none"> • We need a reference to diversified food production and nutrition-sensitive agriculture. Subsidy programs are

	<p>influencing significantly what is produced and with which methods. Therefore, in order to have the agricultural production becoming more sensitive, they need to be adapted accordingly as well. Add text as highlighted.</p> <ul style="list-style-type: none"> • Change subsidies to incentives.
<p>b) Governmental actors, private sector actors, development partners and donors should diversify agricultural investment and incentivize all types and sizes of <u>food</u> 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 aqua culture).</p>	<p>Active:</p> <ul style="list-style-type: none"> • Change to “food producers” • No reason to limit to those practices mention they are other one like. Delete (preference) or extend the list
<p>c) Governmental actors should integrate urban and peri-urban agriculture and urban land use into national and local agricultural food systems and nutrition development strategies and, food and nutrition programmes, and as well as urban and territorial planning, as a viable input into <u>sustainable</u> healthy diets for growing urban populations and social cohesion of communities.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “food systems and nutrition” and do not only refer to agricultural development strategies. Broaden the focus. • Add “sustainable and” to be in line with para 24 (objective of the VGFSyN)
<p>d) Governmental and private sector actors should ensure enabling environments to assist and ensure farmers and other food producers have access to innovative 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 <u>sustainable</u> production, safety, and nutritional quality of crops for markets.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Simplify the sentence and integrate a reference to innovative technologies • Add “sustainable” to production
<p>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</p>	<p>Active: Please delete. No international definition what biofortified crops constitutes.</p>

<p>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.</p>	
<p>3.2.4 Improving food storage, processing, <u>packaging</u>, transformation and reformulation</p>	<p>Active: We would like to add “packaging”, as it is an important aspect of handling of food (see also figure 3 of HLPE report).</p>
<p>a) <u>bis Governmental actors should also invest in transportation and road infrastructure to ensure the production of smallholder farmers are able to reach markets. These supply chain investments should be complemented with improved and accessible information technology, training and capacity building to increase farmers' opportunities to deliver diverse, perishable, safe and nutritious food to market and for consumers to access those markets.</u></p>	<p>Active: Add this sentence as <i>a) bis</i>, as investments in transportation and road infrastructure is important from a food system perspective.</p>
<p>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, <u>as well as transportation, and retail food waste</u> (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 technologies³⁶ ³⁶Technologies include cold chambers storage units, solar walk-ins, refrigerators, dry storage, storage drums and drying facilities.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Delete “nutrition loss”. Is a new concept that has not been defined. • Add “food waste” and not retail
<p>c) Governmental actors should establish guidance on the use and scale-up of processing technologies¹ 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. <u>Governmental actors should set guidelines for and monitor the level of processing as highly-processed food are interlinked with unhealthy diets, overweight and obesity.</u></p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “scale-up” as not only the use but also the scale-up of such processing technologies • Add last sentence as reference to processed food is important aspect of these guidelines and it relates to overweight and obesity.
<p>d) <u>bis Governmental actors to adopt strong measures that reduce the overall impact on children of all forms of marketing of foods high in energy, saturated fats, trans fats, sugar or salt.</u></p>	<p>Active: Add text as indicated. After COVID-19 and the clear link between overweight / obesity and the increased sensitivity to the virus we need such a recommendation.</p>

¹ 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.

<p>e) Private sector actors should strive to meet public health goals aligned with national food-based dietary guidelines by further producing and promoting nutritious and sustainably produced foods and food products that contribute to a sustainable and 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.</p> <p>Private sector food and beverage actors should strive to meet public health goals by reformulating food to ensure less nutritious ingredients – such as sugars, salt/sodium and unhealthy fats such as trans fats – are minimized or eliminated in food and beverage products and nutritious ingredients such as fibre, and other health promoting ingredients are increased.</p>	<p>Active: New text is not clear. Change as highlighted.</p>
<p>e) bis: <u>Governmental actors should incentivize private sector food actors to work towards more sustainable and safe packaging of products such as nanotechnology, waxing, plant-based wrapping, and biodegradable plastics. Furthermore, governmental actors should institute regulatory instruments to promote reformulation, complemented with warning labels and taxes on less nutritious and sustainably produced food products that do not adhere to national food-based dietary guidelines.</u></p>	<p>Active: Add text as highlighted. Packaging and regulatory instruments to promote warning labels and taxes on less nutritious and sustainably produced food are important aspect of these guidelines.</p>
<h3>3.2.5 Improving nutrition and health of farm and food system workers</h3>	
<p>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 (<u>including child labour</u>) which could negatively impact their health status.</p>	<p>Active: make a specific reference to child labour</p>
<p>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.</p>	<p>Active: No need to specify nutritious food to association of healthy diets.</p>
<h3>3.2.6 Empowering youth across food systems</h3>	
<p>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 services, education, training, markets, and inclusion in decision-making processes in</p>	<p>Active: Positive wording is better.</p>

accordance with national legislation and regulations.	
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 <u>entrepreneurship of youth</u> (particularly in countries experiencing high rates of youth internal and external migration), <u>especially to attract and enable youth to be drivers of improvement toward sustainable food systems.</u>	Active: <ul style="list-style-type: none"> • Delete “social”. Not clear, why it only related to social enterprises. Support entrepreneurship of youth is the key aspect here. • Youth are important drivers of improvement towards sustainable food systems. Add as highlighted.
<u>3.2.7 Making markets work for nutrition</u>	Active: Add this chapter with relevant paragraphs. This chapter is of utmost importance as reference to food price volatility, public investment in market infrastructure and support the local consumption is key in order to achieve sustainable food systems that deliver healthy diets.
a) <u>To reduce food price volatility of nutritious food, states should promote transparency across food-related market transactions in real-time, with more emphasis on nutritious commodities, including enhanced tracking of food supply and stock data, and future prices.</u>	Active: Add text as highlighted
b) <u>States should increase public investment in market infrastructure (roads and bridges, physical markets, storage facilities), to reduce transaction costs and enhance food market performance particularly for perishable and nutritious food.</u>	Active: Add text as highlighted
c) <u>States and private sector actors should support smallholders to meet safety and quality standards of nutritious food that enable them to fulfill demand for the local consumption whilst reaching broader markets and getting higher profits for their products.</u>	Active: Add text as highlighted
3.3 EQUITABLE ACCESS TO HEALTHY DIETS DELIVERED BY SUSTAINABLE FOOD SYSTEMS	
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 ³⁸ , considering the various physical, social, economic, cultural, and political factors that influence that access. For many people, access to <u>sustainable and healthy</u>	Active: Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).

<p>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 <u>sustainable and</u> healthy diets within sustainable food systems in the places where people shop, choose, and eat food.</p> <p>³⁸ FAO. 2004. Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security. Paragraph 15.</p>	
<h3>3.3.1 Improving access to food that contributes to healthy diets</h3>	
<p>a) e) Governmental actors should improve the availability and access of nutritious food that contributes to <u>sustainable and</u> healthy diets through investment and trade policies and agreements and policies, in accordance with <u>relevant international law</u>, WTO and multilaterally agreed rules, <u>ensuring no negative impact on and use such agreements to ensure</u> the progressive realization of the right to adequate food in other countries.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add as e) not as a). We recommend not to put it as the first paragraph in this chapter • Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24). • Besides trade policies and agreement, also include investment agreements and policies • Efforts should go towards ensuring <u>no negative</u> impact on the realization of the right to food
<p>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 other people living working in rural areas <u>and people facing physical constraints due to age, illness, or disability</u>, have sufficient access and ownership to/of diverse food markets in accordance with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), <u>UNDROP and other relevant international instruments</u>.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Formulation as per UNDROP: “peasants and other people working in rural areas”. • Delete “markets” but access to food in general as the title of the chapter states. • Make reference to UNDROP and other relevant international instruments.
<p>c) Governmental actors should minimize physical barriers so that people can grow, purchase, order or eat diverse types of foods that contribute to <u>sustainable and</u> healthy diets in a given food environment. This can be done by instituting <u>rural and urban</u> planning policies that encourage retail outlets that sell affordable nutritious foods that contribute to <u>sustainable and</u> 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 homes food production and gardens, where appropriate.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24). • Not only urban, consumers living in rural areas have also the rights to have access to such retailers. In fact in many countries situation is already worst in rural area.

<p>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 <u>sustainable and</u> healthy diets <u>especially</u> in low-income areas, and reduce the concentration of vendors that sell foods high in energy density with minimal nutritional value.</p>	<p>Active: Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).</p>
<p>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 <u>sustainable and</u> 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.</p>	<p>Active: Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).</p>
<p>3.3.2 Improving the availability and affordability of food that contributes to sustainable and healthy diets</p>	<p>Active: Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).</p>
<p>a) Governmental actors should consider fiscal policies to promote the affordability of <u>sustainable and</u> healthy diets. This includes subsidies to promote nutritious and <u>sustainably produced</u> 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.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “sustainable and” + “sustainably produced” to be in line with the title and the main objective of the VGFSyN (para 24). • Delete options. Unclear.
<p>b) Governmental actors should strengthen public procurement systems by ensuring <u>sustainable and</u> healthy diets are available, <u>accessible and</u> 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.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “sustainable and” + “sustainably produced” to be in line with the title and the main objective of the VGFSyN (para 24). • Add “accessible” to be in line with the concept of food security.
<p>c) Governmental actors should link the provision of sustainable and 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. Policy makers Government actors <u>and other relevant stakeholders</u> intergovernmental organisations and farmer organisation should consider promoting home</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24). • Relevant to all other stakeholders as well

<p>grown school meals, where food served in schools is procured from local, smallholder and/or family farmers.</p>	
<p>d) Governmental actors and intergovernmental organizations should facilitate the affordability of <u>sustainable and</u> healthy diets for poor households through social protection programmes such as vouchers, cash, school feeding, or food supplement programmes.</p>	<p>Active: Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).</p>
<p>e) Governmental actors, consumers, and farmer organizations should promote the availability of nutritious and <u>sustainably produced</u> food that contributes to <u>sustainable and</u> healthy diets through local farmers markets, community cooperatives and other community-building efforts that engage people around local food cultures.</p>	<p>Active: Add <u>sustainable and</u> as well as <u>and sustainably produced</u> to be in line with the title of the guidelines and the main objective of the guidelines (para 24).</p>
<p>f) States should consider pricing policies of <u>perishable fruit and vegetables, whole grains, legumes, nuts and seeds, and animal source food to ensure they are affordable and competitive compared with highly-processed food (which can be inexpensive but high in added sugars, sodium and trans-fats or unhealthy fats)</u>. This can be done through <u>input subsidies, access to credit, and tax</u>.</p>	<p>Active:</p> <ul style="list-style-type: none"> • As per Draft One, we would like to see recommendations on reducing the price of nutritious and sustainably produced food.
<p>g) States can be instrumental in reducing the prices of nutritious and <u>sustainably produced food by helping farmers reduce their production costs</u>. This can be accomplished through <u>grants, subsidies and non-financial support services to reduce inefficiencies and promote value of nutritious food in the supply chain</u>.</p>	<p>Active:</p> <ul style="list-style-type: none"> • As per Draft One, we would like to see recommendations on reducing the price of nutritious and sustainably produced food.
<p>3.3.3 Monitoring new technologies and promoting trends for <u>sustainable and</u> healthy diets</p>	<p>Active: Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).</p>
<p>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 <u>and sustainably produced</u> foods that contribute to healthy <u>and sustainable</u> diets on social media spheres.</p>	<p>Active: Add “sustainable and” as well as “and sustainably produced” to be in line with the title of chapter 3.3 and the main objective of the VGFSyN (para 24)</p>
<p>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 <u>and sustainably produced</u> foods that contribute to diets, display information about food on menus (i.e. calories, product composition, other nutritional content <u>and other relevant information such as life-cycle</u></p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “sustainable and” as well as “and sustainably produced” to be in line with the title of chapter 3.3 and the main objective of the VGFSyN (para 24) • A reference to “life-cycle assessment” should be added

<p>assessments), avoid food waste, and adhere to food safety regulations.</p>	<p>here</p>
<p>3.4 FOOD SAFETY ACROSS SUSTAINABLE FOOD SYSTEMS</p>	
<p>3.4.1 Adopting <u>Strengthening</u> national and international cooperation on food safety</p>	<p>Active: Unclear. Change to strengthening.</p>
<p>a) Governmental actors should promote food safety within their food systems policies or and develop food safety policies that consider actions across the entire food systems - <u>concerning production, processing, handling, preparation, storage, and distribution of food.</u></p>	<p>Active: Please change “or” to AND. Delete last part – redundant.</p>
<p>b) Governmental actors should develop, establish, strengthen and enforce, as appropriate, food safety 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.</p>	<p>Active: specify “food safety”. Shorten para by deleting reference to Codex Alimentarius Commission.</p>
<p>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 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.</p>	
<p>3.4.2 Ensuring food safety across food production systems</p>	
<p>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 <u>recognized</u> standards <u>adopted by competent international organizations.</u> relevant to World Trade Organization/Sanitary and Phytosanitary (WTO/SPS) agreements and Codex ad hoc Intergovernmental Task Force on</p>	<p>Active: They are other bodies such as the Tripartite FAO/WHO/OIE that make important work in this area. Make deletion as highlighted and go back to text Draft One.</p>

<p>Antimicrobial Resistance, This is to reduce the non-therapeutic use of antimicrobials and to phase out the use of antimicrobials as growth promoters.</p>	
<p>3.4.3 Protecting consumers from food safety risks in food supplies</p>	
<p>b) Investment by private sector actors and donors should be made to train food producers, handlers and preparers processors and adopt scientific, risk-based practices that can provide safe food while retaining their nutrient content.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Delete donors, there is no specific role for them. • Replace preparers with processors
<p>c) Governmental actors should understand, and evaluate <u>assess and manage</u> risks and unintended consequences and manage of 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.</p>	<p>Active: Government actors will certainly not manage new food products. Usually they do risk assessment and risk management. Unintended consequences is part of risk assessment.</p>
<p>3.5 SOCIAL RELATIONS, KNOWLEDGE AND CULTURE OF DIETS</p>	<p>Active: The new title of section 3.5 is not appropriate. Please use the original title “people centered nutrition knowledge, education and information”</p>
<p>42. It is important to consider and protect the range and diversity of food cultures, social norms, relations, and traditions that contribute to <u>sustainable and</u> 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 <u>sustainably produced and</u> nutritious food, <u>sustainable and</u> healthy diets, nutrition <u>and on sustainable food systems</u> as a way to empower people and key actors across food systems, and improve places in which people access food in their daily lives. 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.</p>	<p>Active: Add text as highlighted to be in line with the title and the main objective of the VGFSyN (para 24).</p>
<p>3.5.1 Utilizing policies and tools to provide education and information on <u>sustainable and healthy diets</u></p>	<p>Active: Add “sustainable” to be in line with the title and the main objective of the VGFSyN (para 24).</p>
<p>a) Governmental actors should develop national food-based dietary guidelines for different age groups that define context-specific, diverse, <u>sustainable and</u> healthy diets by taking into</p>	<p>Active: Add “sustainable” to be in line with the title and the main objective of the VGFSyN (para 24).</p>

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 <u>and youth</u> 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 . Such measures could include the prohibition to sell and advertise such food <u>in public places or near schools, including child care facilities</u> .	Active: Make additions and deletions as indicated.
c) Governmental actors should regulate the marketing of commercial infant formula and other breast-milk substitutes and implement <u>enforce</u> the International Code of Marketing of Breast-Milk Substitutes ⁴⁰ and subsequent WHA resolutions. <small>40 International Code of Marketing of Breast-Milk Substitutes. WHO, 1981. Geneva.</small>	Active: The role of states is mainly to enforce the Code that is implemented by many non-state actors
d) Governmental actors should regulate nutritional labelling and consider front-of-pack labelling (FOPL) to promote <u>sustainable and</u> 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.	Active: Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).
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 <u>sustainable and</u> healthy diets in retail spaces.	Active: Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).
f) <u>Governmental actors, UN agencies, NGOs,</u> and medical and health practitioners should consider coupling nutrition education and counselling to populations participating in maternal and child nutrition programmes.	Active: Adapt to correct terms of defined stakeholders as per Para 30.
g) Governmental actors, UN agencies, NGOs, <u>the private sector and</u> 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).	Active: Add “the private sector and”. Not enough to only have a specific reference to medical and health practitioners.
h) <u>Governmental actors, intergovernmental organizations including UN agencies, civil society</u>	Active: Adapt to correct terms of defined stakeholders as per

<p>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.</p>	<p>Para 30. “Preparers of food” is unclear = delete.</p>
<p><u>h) bis: Governmental actors, intergovernmental organisations, private sector, food actors and NGOs should implement nutrition education and information interventions based on Food-Based Dietary Guidelines and other policies related to food systems. The inclusion of nutrition education and information within agriculture extension technical packages as a way to support producers in increasing the production of high nutrient density crops and crop diversification should be considered.</u></p>	<p>Active: Nutrition education in other sectors, e.g. agriculture (with the exception of health) is not part this section anymore. Content of g) has been added to 3.2.3. An additional paragraph should be added here as well to cover nutrition education and information in other sectors. Integrate new lit. f) as highlighted.</p>
<p>3.5.2 Encouraging local food knowledge and culture</p>	
<p>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 <u>sustainable and</u> healthy diets, physical activity, food waste prevention, intrahousehold food distribution, food safety, optimal breastfeeding and complementary feeding, taking into consideration <u>local</u> cultural and social norms and adapting to different audiences and contexts.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24). • Delete “intra”household”, unclear, by far too specific • Add “local” culture
<p>b) Governmental actors <u>and relevant non-state actors</u> 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.</p>	<p>Active: Not needed to list all actors in detail, just refer to relevant non-state actors.</p>
<p>3.5.3 Promoting “hubs” for <u>food and</u> nutrition knowledge, education and information</p>	
<p>b) Governmental actors, civil society organizations and UN agencies <u>intergovernmental organization, universities and schools</u> should promote culinary skills among school-age children, adolescents and adults (including promoting communal mealtimes, socializing around food, consuming <u>sustainable and</u> healthy diets, and reducing food waste) in schools, workplaces and community centres.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Name relevant stakeholders as highlighted and in consistency with para 30. • Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).
<p>c) Governmental actors should adopt and implement comprehensive school food and nutrition policies, review education curricula to incorporate nutrition <u>and sustainability</u> principles, involve communities in promoting and creating healthy food environments and</p>	<p>Active: add text to make the paragraph more concrete in terms of what a «comprehensive policy» includes</p>

<p>sustainable and healthy diets in schools, <u>link the provision of healthy school meals with clear nutritional and environmental objectives</u>, and support school health and nutrition services.</p>	
<p>d) Governmental actors, intergovernmental organizations, NGOs, and civil society organizations should engage in food and 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).</p>	<p>Active: Not only knowledge to nutrition but also to food. See comment on title of 3.5.3.</p>
<h3>3.6 GENDER EQUALITY AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS</h3>	
<h4>3.6.1 Empowering women</h4>	
<h4>3.6.2 Promoting and acknowledging women as food system entrepreneurs</h4>	
<p>c) Governmental actors, NGOs and private sector actors should promote and increase access of women to labour and time saving technologies⁴¹ that could help improve their livelihoods of women.</p> <p>⁴¹ 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.</p>	<p>Active: please integrate the reformulation</p>
<h3>3.7 RESILIENT FOOD SYSTEMS IN HUMANITARIAN CONTEXTS</h3>	
<p>44. Linking food security and nutrition interventions during humanitarian crises (man-made and <u>climate-change</u>-related disasters) with longer-term strategies to strengthen the resilience of food systems is key.</p> <p>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)⁴².</p> <p>⁴² CFS Framework for Action for Food Security and Nutrition in Protracted Crises</p>	<p>Active: Climate-change-related disasters not climate-related disasters.</p>
<h4>3.7.1 Protecting the most vulnerable to malnutrition in humanitarian contexts</h4>	
<p>c) Governmental actors, with the support of the UN system and international assistance and</p>	<p>Active: please revise formulation as indicated</p>

<p>cooperation where appropriate, should ensure access to nutritious food and nutritional support for refugees and asylum seekers in their territory, in accordance with their <u>governments’ obligations</u> under relevant international legal instruments.</p>	
<p>3.7.3 Ensuring food systems are resilient in humanitarian contexts</p>	
<p>a) Governmental actors in partnership with relevant organizations should develop and use early warning systems, climate services information systems services, and as well as 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 <u>sustainable and healthy diets</u> at the local level.</p>	<p>Active:</p> <ul style="list-style-type: none"> • Make reference to climate services information systems according to WMO. • Add “sustainable and” to be in line with the title and the main objective of the VGFSyN (para 24).
<p>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. <u>Measures include social safety nets, investment in protecting fragile livelihoods, emergency fiscal and food reserves, the reduction of transaction costs, and the identification of platforms for integrated interventions.</u> Governmental actors should aim to restore local food production and market accessibility as rapidly as possible.</p>	<p>Active: Add text from Draft One as indicated to make the paragraph more specific.</p>
<p>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.</p>	
<p>PART 4 - IMPLEMENTATION AND MONITORING OF THE USE AND APPLICATION OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION</p>	

<p>4.1 POLICY FORMULATION AND IMPLEMENTATION OF THE VGFSyN</p>	
<p>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 <u>toward the promotion of sustainable food systems that deliver sustainable and healthy diets and improve nutrition.</u></p>	<p>Active: to link the paragraph to the objectives of the VGFSyN “to promote sustainable food systems [...] that contributes to sustainable healthy diets”.</p>
<p>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 <u>sustainable and</u> 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 <u>and the One Planet network’s Sustainable Food Systems Programme, ensuring that all relevant stakeholders, including representatives of the most nutritionally-vulnerable groups, are involved and engaged, and promoting policy coherence.</u></p>	<p>Active:</p> <ul style="list-style-type: none"> • Add “sustainable and” to be in line with the title and objective of the guidelines. • Add last sentence, as the inclusive character of dialogues is important.