

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

Consolidated feedback from FAO

General comments

- The SDGs call for leaving no one behind provides good leverage for bringing in the equity dimension into the discussion on healthy diets and inclusive food systems.
- A discussion of the supranational level is missing. If malnutrition is a global problem, and if transactional actors hold so much in the way in which food systems operate and dietary habits get shaped, then the response must be global too. There is a role for international cooperation through the established inter-governmental channels to bring a measure of transnational governance/control/regulation to the actions of powerful actors straddling across borders.
- From the current draft it is not entirely clear if the emphasis is on promoting better nutritional outcomes or on sustainability in its three dimensions in general. Healthier diets are not necessarily more sustainable in other dimensions than human health. Please note that the FAO/WHO International technical consultation held in 2019 referred to the guiding principles of Sustainable Healthy Diets (i.e. thus without adding the word “and”).
- Countries need to understand their food systems to determine where the problems are, prioritize and take action. This therefore calls for simple, easy to use tools that countries can use to do national food systems analysis. What countries need beyond all else are proposed solutions and guidance to help Governments to take action.
- Food systems are extremely complex. Interventions in one part of the system can have severe positive and negative impacts on other parts. Not enough emphasis is given to the complexity of the matter, the difficulties in impact assessment and guidance on weighing and weighting divergent impacts in different sustainability dimensions/on different stakeholders in decision-making.
- The document lacks sufficient attention to the role of law on influencing behavior and stronger focus on corporate influence, conflict of interest and the need for strong and enforced legislation over voluntary arrangements which have proven to be less effective.
- The draft looks like it has already been through negotiations that have watered down all the bite. The draft is overly timid in recommending legislative or regulatory frameworks as tools to change food system actors. What should be submitted to the negotiations is a strong draft, with recommendations on safeguards, legal provisions and enforcement, as well as considerations on how this interacts with international trade, and then let the negotiations start. Such measures should be fair and non-discriminatory, and work against a race to the bottom. Sustainability and health focused companies may not be able to compete if others are simply allowed to continue to produce and push their food products with minimum nutritional value on the market.
- The Guidelines are a bold attempt to cover the extremely wide area of food systems (and beyond) and try to link it with nutrition and related issues. While this is commendable, there is a risk that it may be difficult to be adopted or complied by any government or non-govt. officials without adequate support, resources or mandate from all sectors. Perhaps it might be useful to prioritize the ‘most important’ areas that are relevant for nutrition and healthy diets.
- It is important not to assimilate the global trends to what can happen at local levels - and that could be one of the different solutions to consider towards healthier diets.

- For many countries in the developing world the food system is fraught with issues of food safety. Healthy diet is unattainable if food safety issues within the food systems is not addressed.
- Recommendations that states (and private and other sector) should have clearly stated objectives with a time frame which will assist in monitoring are missing. Examples: within 5 years reduce overweight and obesity in population over 15 years from 75% to 65%.
- The imbalance of power of multinational stakeholders versus national actors, and the resulting difficulties in curbing the unsustainable (social and environmental) practices by national governments. Hence the need to support national actors in pushing through regulations that have people's health as their first priority, the importance of trade agreements taking on a food system approach and nutrition considerations, among others.
- The underemphasis of access to nutritious foods (other than physical access). The persistence of extreme poor and the growing number of near poor, as well as the growing inequality should take a greater importance in the guidelines. The resulting inequitable access to food and services, all play an enormous role in nutrition. Furthermore, this would align to the SDGs and leaving no one behind.
- Social protection could support access of the most vulnerable to more nutritious food, but also in times of shocks ensure households do not resort to negative coping strategies with detrimental effects on their nutrition.
- Do we know what the ideal food system would look like, .i.e. when can governments or municipalities or other actors (e.g. private sector, FAO) say that they reached the ideal system? That they have done enough and that they can celebrate success?
- The document does not mention urban agriculture development as a way to enhance access to nutritious foods.
- The role of biodiversity in ensuring agriculture and food biodiversity needs to be highlighted.
- The language about animal products could be improved to have a better balance between the different types of food. "Animal source food" are present here and there; but treated as a block and not detailed in different products such as meats, eggs, yogurt, cheese... while plant food are always detailed: fruit, vegetables, healthy oils, nuts and seeds, legumes, biofortified crop. For example, meat is only included once in a reference to "lab grown meat", dairy is only included in a sentence that is confusing: "dairy and animal source food", milk is only included in a short para about breast feeding, and eggs are not mentioned at all.
- Human kind has been feeding itself for thousands of years. Prior to the appearance of Agriculture indigenous peoples' food systems were generating food on a sustainable way without depleting the natural resource base. This knowledge is today more relevant than ever if we are to come up with guidelines about sustainable food systems for nutrition.
- Today between 550 and 870 million indigenous peoples and pastoralists in the world feed themselves through their Indigenous food systems, which rely on collective rights, nomadism and traditional knowledge to generate food in harmony with nature. Some of these peoples are among the 2019 SOFI 821 million food insecure. Yet their food systems and ways of generating food are not fully understood and dealt by guidelines. It is important for the CFS, UN, FAO and member countries to address the peculiarities and specificities of these indigenous and pastoralist's food systems that have more in common with the traditional food systems underlined in the HLPE report, than with the commercial agriculture based food systems towards which the present draft one of these guidelines is geared. Their traditional and indigenous food systems are supported by ancestral knowledge systems, languages, culture, spirituality and cosmogony. The generation of food is not done by humankind, instead is provided by the well-functioning of the natural resource base and its biodiversity as well as their interactions in the

environment. Within the present context of climate crisis, it is pertinent to look into these food systems contributions, given the sustainability that they have proved by providing food over hundreds of years. As highlighted in the Voluntary guidelines on the responsible governance of tenure of land, fisheries and forests in the context of national food security, it has been shown that access to land and respect of their collective rights to their ancestral territories play a major role for the food security of these peoples and communities (Ref. *IFAD (2018) Indigenous Peoples' collective rights to lands, territories and natural resources. Lessons from IFAD-supported projects*).

- The current draft offers to States and other actors a menu of more than 100 possible action items that are supposed to “contribute to reshaping or promoting food systems to ensure that the food that contributes to sustainable and healthy diets is available, affordable, acceptable, safe, and of adequate quantity and quality....”, as per the stated objective. 10 of these are on governance of food systems; 37 on supply chains which determine the availability of safe and nutritious food; 15 on equitable access to sustainable and healthy diets; 19 on people-centered nutrition knowledge, education and information; 10 on gender equity and women’s empowerment and 11 on food systems and nutrition in humanitarian contexts. The main actors named in the guidance are States. The main actions touch on what to do, giving only limited insight into how to prioritize, how to implement and how to sequence these actions. In the completion of the draft it may be helpful to test the user-friendliness of the presentation of the guiding actions. If given to representatives of a State or to another category of actors, what would they start with? How would they use the action points to make choices required in implementing the guidelines? How would they measure progress? The finalization of the guidelines should foresee a light assessment of how user-friendly and how practical the guidance is from a client perspective.
- It is important to realize that without the support of other sectors, Government alone will not be able to deliver on the suggestions/guidelines. Many guidelines are very specific. While the state can play an important role in defining an enabling environment for change, a complete over-regulation in all the areas mentioned would likely lead to contradictory policies and a general standstill of development. Instead support and guidance would need to be given on setting priorities: how to identify the main obstacles to better nutritional/food systems outcomes in specific contexts, how to address them and how to deal with potential negative externalities of the intervention.
- In addition, there is a need to disaggregate references to ‘the private sector’. For instance production and processing is often clustered in the same recommendation, when the activities and actors differ and therefore the responses need to be different. A number of suggestions are also included on where and how states could engage with the domestic and international food industry in the pre-competitive space; mostly with reference to processed and packaged goods’ companies. For example, in some countries consumer tastes and markets need to be created (market development) for more nutritious goods, and typically small and medium food companies will not have the resources or capacities to do market development. In these cases public-private sector collaboration is key for co-investing in technologies, research, for instance in food science, adaptation of private sector skills and business models.
- Alignment with and leveraging other relevant HLPE Reports is needed such as on [“Multi-Stakeholder Partnerships to finance and improve food security and nutrition in the framework of the 2030 Agenda”](#) (i.e. Food Systems are by definition complex multi-actor and sector processes)
- It is necessary to apply a “business-as-usual”, “system-wide” capacity enhancement approach (See page 38 in [“Feeding People – Protecting the Planet: FAO-GEF Partnership”](#) beyond training that empowers people, strengthens organizations, institutions and networks as well as a more conducive policy environment to achieve more sustainable results at scale (i.e. foster country ownership and commitment).

	<ul style="list-style-type: none"> • Another aspect that seems to be missing is a reference to establishing a baseline. What would States that intend to reshape or promote food systems for sustainable and healthy diets start with? What does their food systems look like? What contributions does it make to healthy diets? Is it done in a sustainable manner? What are the most striking nutrition-relevant bottlenecks? The guidance in the draft includes a section on monitoring and evaluation, as well as on accountability mechanisms, but the absence of a call for setting a clear baseline of what the food systems look like that the guidelines intend to reshape seems like an important gap. The next round should address this. • List of acronyms is missing.
<p>1.1. Background and rational General comments</p>	<ul style="list-style-type: none"> • Given that the VG title is "Food Systems and Nutrition", it may have sense to add since the beginning something on food systems as the bases of availability, access and stability dimensions of food security (definition in footnote). As in the document it is made reference to food systems only on paragraph 11 with negative connotations, something should be said on efficient and sustainable food systems earlier. Nevertheless, an introduction all conceived in negative perspective is quite discouraging. • Perhaps a preface on the policy process towards developing these guidelines could be added? This section could be further streamlined to improve its flow, in particular paras 2 to 6, as there are many repetitions (NCD risk, overweight/obesity) giving the impression to start again at each para. • You may also want to consider a specific paragraph on NCDs, i.e. their relation with diets and malnutrition, as well as their impact (human, economic, etc.). This might help to make the rationale about the importance of such guidelines even stronger (than having it spread among different paras). •
<p>1.1. Background and rational Suggested new paragraphs for inclusion</p>	<ul style="list-style-type: none"> • <u>Food systems exist on a continuum and present a huge diversity¹. The 2017 HLPE report on Nutrition and Food Systems identifies three broad types of food systems: traditional; mixed; and modern food systems.</u> • <u>More than 550 million people and communities that rely on collective rights to communal resources and lands, such as Indigenous peoples, pastoralists and small fishers, draw on food systems that share certain characteristics with the HLPE's traditional food systems while presenting important peculiarities that set them apart and make them unique. Traditional and indigenous food systems are rooted in customary tenure systems supported by ancestral traditional knowledge, language, culture, spirituality and cosmogony.</u> • <u>Traditional and indigenous food systems' resilience has enabled to generate food while preserving biodiversity and adapting to extreme climatic conditions for years. Their main characteristics are: (i) food is generated through the management of the ecosystem and its different interactions² more than</u>

¹ High Level Panel of Experts on Food Security and Nutrition's (HLPE) Report on Nutrition and Food Systems (2017). P.35.

²The main characteristics of traditional food systems is that they are not anthropocentric but biocentric. Biocentrism has several definitions in ecology and in resources management but it could be summarized as an ethical approach that holds that all life deserves equal considerations and has therefore rights of existence and standing. Biocentrism embodies the cosmogony of indigenous peoples across the world and can be witnessed in the different ceremonies

	<p><u>produced; (ii) the generation of food follows seasonality patterns, which implies food diversity and heterogeneity of sources of food in the diet consumed (iii) food and medicine are one and nutrition is part of the food generated and not exogenous; (iv) the ecosystem is seen as an integrated unit where its biophysical components also generate energy and by-products (v) territorial and landscape management practices have been fine-tuned over centuries and transmitted orally through generations; (vi) indigenous peoples knowledge integrates food with medicine, environment, culture and spirituality into a wellbeing-health system.</u></p>
Paragraph 1 General comments	<ul style="list-style-type: none"> • All the first points are important however present a strong focus on nutrition before even mentioning issues pertaining to food systems. Suggesting perhaps replacing the order/logic in order to present with a more holistic perspective that looks at nutrition in conjunction with other public policy objectives critical in the transition towards sustainable food systems. • Malnutrition and food insecurity are serious enough problems as to not require the assertion that they “have become [sic] one of the major global challenges that countries face today”. Some of these statements, in fact, would get more traction if the Note could provide evidence to support them. • Politically it may be correct to emphasize that malnutrition in all its form threatens the achievement of global food security. From a more technical perspective, it would be equally important to state that food insecurity in an impediment to good nutrition outcomes. The formulation should be revisited to better reflect the systemic linkages between food security and nutrition. It should not remain one-directional. • It seems that the failure to realize the right to food for all is a determinant of the persistence of malnutrition, instead of the other way round.
Paragraph 1 Suggested edits	<p>Malnutrition in all its forms – undernutrition, micronutrient deficiencies, overweight, and obesity – has become<u>remains</u> one of the major global challenges that countries face today. Malnutrition in at least one of its forms affects every country in the world and most countries are affected by multiple forms. This represents a major impediment to achieving global food security³, the realization of the right to adequate food, and the implementation of the 2030 Agenda for Sustainable Development <u>which is grounded on human rights</u>. The impacts of malnutrition and its various manifestations have profound consequences on people’s health and wellbeing, physical and cognitive development, lives and livelihoods throughout their lifetimes and from one generation to another.</p>
Paragraph 2 General comments	<p>With specific reference to “Stunting and wasting continue to represent significant challenges to achieve the 2030 goals and targets”:</p>

and rites, many linked to festivities and food practices. This has been highlighted in several documents as the Encyclical letter of Pope Francis (Laudato Si 2015), Harmony with Nature, note by the UN Secretary-General (2015) and the Final Report of the High-Level Expert Seminar on Indigenous Food Systems, held in FAO Rome in 2018.

³ 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.

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	<ul style="list-style-type: none"> Given that stunting and wasting have such concrete manifestations in the way they affect people, why refer here instead to such abstract constructs as the 2030 goals and targets? Bring the consequences of stunting and wasting closer. <p>With specific reference to “settings”:</p> <ul style="list-style-type: none"> Some figures about the incidence of malnutrition either global or by regions would illustrate the magnitude of the problem.
Paragraph 2 Suggested edits	<p>Malnutrition in all its forms is associated with various forms of ill health and increased levels of mortality. Undernutrition is a major cause of death among children under five while newborns with a low birth weight are more frequently affected by infectious diseases during early life and are predisposed to higher risk of contracting non-communicable diseases (NCDs) <u>in adulthood</u>. Stunting and wasting continue to represent significant challenges to achieve the 2030 goals and targets. While wasting, also known as acute malnutrition, represents a greater risk of mortality and morbidity, stunting, or chronic malnutrition is associated with delays in both physical growth and cognitive development. The co-existence of wasting and stunting, as well as stunting and obesity in children under the age of five, poses major risks in some regions. Overweight and obesity are increasing in every region, with rural areas catching up to urban settings.</p>
Paragraph 3 General comments	<ul style="list-style-type: none"> Suggested edit inserted to emphasize that these micronutrients are best consumed in their natural form in FOODS.
Paragraph 3 Suggested edits	<p>Micronutrient deficiencies related to the inadequate intake of <u>foods rich in</u> iron, vitamin A, folate, vitamin D and zinc, affect a large proportion of the global population with serious consequences on health, well-being, and development. Children under five, adolescent girls, women of childbearing age, and pregnant <u>and lactating</u> women have specific nutritional requirements across their lifecycles and are at risk of being affected by anaemia, in particular iron deficiency anaemia. Also referred to as “hidden hunger”, micronutrient deficiency increases vulnerability to infection, birth defects, and impaired development, and lowers life expectancy.</p>
Paragraph 4 Suggested edits	<p>Overweight and obesity represent major risk factors globally for diet-related NCDs such as cancer, cardiovascular disease, and diabetes, as well as chronic respiratory diseases. While undernutrition <u>and micronutrient deficiency is-are</u> still the main forms of malnutrition among children under five, overweight and obesity are increasingly prevalent among school-aged children, adolescents and adults.</p>
Paragraph 6 General comments	<ul style="list-style-type: none"> Suggested edit inserted in order to bridge with next para, which otherwise seems disconnected to this one (while it is in reality providing further detail on one of the main causes). It is recommended to include the gender, indigenous and Afro-descendant approaches, in which these nutritional indicators are exacerbated to critical levels. <p>With specific reference to “low socio-economic status”:</p> <ul style="list-style-type: none"> Underlying inequality, such as access to basic services, gender inequality, that affects intra household distribution of resources, and poverty, income inequality and social exclusion which impacts purchasing power and cycles of poverty and priorities that may not allow for prioritization of childhood development goals.

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Paragraph 6 Suggested edits	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 healthy and safe diets and safe drinking water, inadequate infant and young child-caring and feeding practices, poor sanitation and hygiene, insufficient education and health services, and low socio-economic status <u>as a result of poverty and inequality</u> .
Paragraph 7 General comments	<ul style="list-style-type: none"> • In addition to “poverty and inequality”, illiteracy and low educational level mainly appear among the poorest. • Why talk here about “economic slowdowns and downturns”? Poverty and inequality, especially of the chronic, structural nature, are as much if not more the result of “under-development” than of slowdowns and downturns in an otherwise “normal” economic cycle. • Social protection and health services are crucial. However, malnutrition is due to multiple deficiencies that include agriculture, food systems and environments, education, among others. Therefore, the multisectoral approach is crucial to address the multiple social and economic deficiencies of malnutrition. <p>With specific reference to “inequality influences”:</p> <ul style="list-style-type: none"> • Is meant ‘is reflected in’ rather than ‘influences’? Is it through the income and asset distribution that one can tell how unequal a society is. <p>With specific reference to “determines”:</p> <ul style="list-style-type: none"> • Inequality does not ‘determine’ marginalization and social exclusion. If anything, it would seem to run in the opposite way.
Paragraph 8 General comments	<p>With reference to the specific population groups mentioned:</p> <ul style="list-style-type: none"> • Anyone missing here? Except for white urban males, every possible group is mentioned. It doesn’t help much when most everyone is identified as being vulnerable in a way or another. Note, that more men are also vulnerable and dying prematurely from NCDs compared to women in some regions; e.g. in the Pacific, male population in the productive age group are dying prematurely from NCDs). • “migrants” inserted as migrant households in areas of destination are generally less food-secure and vulnerable to malnutrition than non-migrant households <p>With reference to “agriculture and food chain workers”:</p> <ul style="list-style-type: none"> • Be more specific? This is very broad.
Paragraph 8 Suggested edits	The most affected by malnutrition in all its forms typically includes those with increased nutrient requirements and those who have less control over their choice of diet, including young and school-aged children, adolescents, pregnant and lactating women, the elderly, and disabled people. In addition, urban poor, indigenous peoples, peasants, rural poor, agriculture and food chain workers, upland and remote communities, <u>migrants, refugees, nomads,</u> and displaced people are particularly vulnerable to malnutrition because of their persistent or temporary poverty.
Paragraph 9 General comments	<p>With reference to “implementation of the 2030 Agenda as a whole”:</p> <ul style="list-style-type: none"> • This is a bit abstract.
Paragraph 10	<ul style="list-style-type: none"> • Considering the focus of these Voluntary Guidelines on food systems that can enable access to healthy diets and improved nutrition in a sustainable way, it may

<p>General comments</p>	<p>be useful to target these elements and their interlinkages to climate change more directly, as the focus here is still very much like the SOFA 2016. Suggest something like: “Climate change, food systems and healthy diets are interconnected. The implications of climate change extend across the determinants of malnutrition as well as the multiple burdens of malnutrition: from underlying factors, such as socioeconomic status and environmental conditions, to more direct determinants, such as food and nutrient consumption, and disease. The latter will be particularly affected through decreased quantity and access to safe and nutritious food, decreased dietary diversity, and a reduction in the nutritional composition of certain crops (e.g. rice, wheat, soybeans). The most vulnerable (rural farmers, children and women) will be the hardest hit, while the regions to be the most adversely affected are those already suffering most from malnutrition and food insecurity. The composition of diets, as well as caloric availability, are thus both risk factors for climate-related health impacts.” Or turning it as an opportunity: “As food systems are shifting and working toward a path of resiliency or status quo, they will have to reconcile adaptation and mitigation objectives, using various means to achieve this: production, conservation and processing techniques that are in line with an ever-increasing demand for sustainable production. Food systems will have to adapt to the transformations and risks brought about by climate change. The modification of production zones, the need to ensure agricultural and food diversity, population migration, and sustainable supply stability are all among the challenges that food systems must address. Food systems thus also have great adaptation potential that can bring about greater resilience. They also offer considerable climate change mitigation potential, for instance through reducing emissions intensity per unit produced or carbon sequestration in soils and biomass.</p> <ul style="list-style-type: none"> • Effect of climate change – soil salinity in low lying Islands and atolls should also be highlighted as result of sea level rise, this is the real issue affecting food security in small Islands States. • As commented by others in the OEWG meeting, the inverse relationship should be added; food production, loss, processing, packaging, consumption and waste contribute to climate change. <p>With reference to “severity of extreme weather events”:</p> <ul style="list-style-type: none"> • ... and emergence and spread of pests and diseases of cultivated plants and farmed animals should be mentioned.
<p>Paragraph 10 Suggested edits</p>	<p>Climate change, agriculture, <u>food security</u> and nutrition are interconnected. <u>Resilient, sustainable and diverse food systems are supported by agricultural production methods in which biodiversity is an essential pillar.</u> Climate change and variability 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 affects <u>access to food</u>, food quantity, quality, safety and ultimately food prices,</p>

	<p>with significant implications for availability/<u>affordability</u> of healthy diets <u>(in order words, adequacy of food)</u>.</p>
<p>Paragraph 11 General comments</p>	<ul style="list-style-type: none"> • Most surely unhealthy diets is the result of prevalent structures and governance of food systems which goes beyond the interconnectedness of actors and places. • Maybe mention the underlying issue of this surge is unhealthy cheap processed foods. With the lack of government ability to regulate and restrict, given the increase lobbying power of large multinationals. <p>With reference to “The enhanced toward unhealthy diets“:</p> <ul style="list-style-type: none"> • The lobby and participation (schools, health, etc.) of the food industry of processed products high in fat, sugar and/or salt, e.g. sugary drinks, should also be recognized as part of the problem. • One of the main determinants is also global income development with changing dietary patterns following the nutrition transition. It is important to mention both supply and demand side factors here. • The sentence sounds quite biased now, not all of the developments are bad. Can it be more nuanced? The enhanced interconnectedness of people and higher incomes globally are good developments; low food prices and easily accessible food for everyone are good developments from a food security perspective. The question is how to find a balance in consumption? • Suggest not to use the term 'ultra-processed' but for instance processed energy-dense foods high in fat, sugar and/or salt. There is currently no clear definition of “processed” or “ultra-processed”. <p>With reference to “An individual’s food choices have impacts“:</p> <ul style="list-style-type: none"> • As commented by WHO at the OEWG meeting, care should be taken to avoid language implying that the problems lie mainly at the level of individuals. Food choices are strongly influenced by the food environment, which in turn is subject to important socio-political-economic forces at the societal level. • Factors instead of impacts? The formulation is not clear as "impacts" is linked to "reflect". <p>With reference to “...,and justice“:</p> <ul style="list-style-type: none"> • “Diets reflect larger systemic issues that impact.... justice?” Rephrase. • Justice affects food choices, not the other way around.
<p>Paragraph 11 Suggested edits</p>	<p>Unhealthy diets represent one of the major risk factors for malnutrition and its related health outcomes. Food systems have become more interconnected from global to local levels, with longer, more complex food supply chains. The enhanced interconnectedness of people and places, globalization, urbanization, and the overabundance of cheap, convenient and often ultra-processed <u>processed</u> foods and beverages <u>that are high in fat, sugar and/or salt together with marketing campaigns</u> are important determinants of shifts in consumer behaviour toward unhealthy diets. Such dietary shifts have been associated with increasing prevalence of overweight, obesity and NCDs worldwide. An individual’s food choices have impacts that resonate far beyond themselves: diets reflect larger systemic issues that impact population, health, sustainability, and justice.</p>
<p>Paragraph 12</p>	<ul style="list-style-type: none"> • Suggest that this paragraph is used as one of the intro paragraph as it provides the overarching context under which states of malnutrition and obesity occur.

<p>General comments</p>	<ul style="list-style-type: none"> • This paragraph should mention agroecological approaches. <p>With reference to “excessive consumption and waste patterns”:</p> <ul style="list-style-type: none"> • In some places? The sentence may be true for several but not all places. The opposite- undernutrition- are still broadly spread in many places. • In addition, the production patterns should be mentioned as well, as they participate in the degradation of natural resources and destruction of biodiversity. <p>With reference to “They are inefficient in resource utilization, including labor and energy”:</p> <ul style="list-style-type: none"> • Evidence base for this? • Food systems are unsustainable not only because they are inefficient but mainly because they are still based on business models based on extractivism and exploitation of natural resources, labor and energy. • Suggest not to write “efficient in labor”, it could be misinterpreted - if efficiency can be considered for natural resources (although to be sustainable, efficiency may be not enough and better to consider the reproduction capacity), for labor it is even more important to consider the capacity of food system to create or at least maintain good job opportunities ; maybe the sentence could be reformulated to distinguish the different issues <p>With reference to “current global dietary trends”:</p> <ul style="list-style-type: none"> • Suggest mentioning the different patterns between types of countries and types of socioeconomic groups? As they have different patterns and are affecting the trends differently? Maybe it is too detailed. <p>With reference to “Food systems can be characterized by inequitable power concentration”:</p> <ul style="list-style-type: none"> • This is a rather bold statement referring to food systems in general and without providing evidence. The main objective of food systems is to provide food, why does it need to deliver benefits for all? What would these benefits be? • May be more explicit, large cooperation, agglomeration in farms production, ... • Global food systems - it is important not to assimilate the global trends to what can happen at local levels - and that could be one of the different solutions to consider towards healthier diets. <p>With reference to “Changes are needed within and across food systems”:</p> <ul style="list-style-type: none"> • Before coming to this conclusion, the statements in this paragraph and earlier would be considerably strengthened if data were provided to support them. <p>With reference to “generate positive outcomes”:</p> <ul style="list-style-type: none"> • Isn't the aim of generating positive outcomes along the three dimensions of sustainability demanding too much of a system whose primary aim it should be to provide food? How should that work, where should trade-offs be made? Instead of asking for positive outcomes, less harmful or neutral outcomes in other dimensions could be strived to achieve.
<p>Paragraph 12 Suggested edits</p>	<p>Current global food systems, with their excessive <u>production</u>, consumption and waste patterns, are unsustainable. They are inefficient in resource utilization, including labor and energy, and lead to environmental degradation. Current global dietary trends are negatively impacting the world’s natural resources, <u>both wild and domesticated</u></p>

	<p>biodiversity, and ecosystems in the context of population growth and pressure. Food systems can be also <u>be</u> characterized by inequitable power concentration and imbalances failing to deliver benefits for all. Changes are needed within and across food systems, with the aim to f generatinge generate positive outcomes along the three dimensions of sustainability – social, economic, and environmental.</p>
<p>Paragraph 13 General comments</p>	<p>With reference to “reshaping or promoting sustainable food systems”:</p> <ul style="list-style-type: none"> • Why ‘reshaping or promoting’ and not both? • While it applies certainly to this paragraph, it is a broader comment on the importance to mention, if not stress in certain instances, the pivotal role that laws play in addressing some of the main issues while reaching some of the key objectives set forth.
<p>Paragraph 13 Suggested edits</p>	<p>Fostering policy, institutional and behavioural changes among food system actors is key to reshaping, <u>preserving</u> or and promoting sustainable food systems that improve nutrition and enable sustainable and healthy diets that meet the evolving dietary needs of growing populations. In order to be effective and sustainable, food system-related policies need to focus on their economic, social, <u>cultural</u>, environmental, nutritional and health consequences, paying special attention to the poorest and most nutritionally vulnerable, and addressing barriers they face in accessing sustainable and healthy diets, <u>hence in realizing the human right to adequate food</u>.</p>
<p>Paragraph 14 General comments</p>	<ul style="list-style-type: none"> • This para makes two statements: one stressing that new policies are needed, and one emphasizing that these should be coordinated. If the main purpose of the para is to emphasize the need to overcome policy fragmentation, one would expect a broader range of ingredients to achieve this. New polices are not enough – that will take time. In the meantime, what will happen with all the existing ones? • What level should the policies be? What level; local, national, regional? Policy on what? On enhancing food systems efficiency and sustainability perhaps? • Broaden the guidelines to include health outcomes more in the language. In fact, the HLPE conceptual framework of food systems refers to “nutrition and health outcomes”. Ultimately, we are interested in nutrition outcomes because of their association with health outcomes. But other aspects of the food system have health impacts that are not necessarily associated with nutrition outcomes, such as the use of agrochemicals and antimicrobials. • Suggest that these paragraphs are used as the intro paragraphs as they provide the overarching context under which states of malnutrition and obesity occur. • Suggested edit “migration” inserted as this is a sector that impacts on food systems and nutrition and thus needs to be considered in policy coordination processes. See also “Policy guidance note 10: Strengthening sector policies for better food security and nutrition results. Rural migration”: http://www.fao.org/3/a-i8166e.pdf When it is not considered as a sector, one could add instead, such things as population policy or regional planning, which do impact migration flows. <p>With reference to “agriculture”:</p>

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	<ul style="list-style-type: none"> Needs to be made clear that all agricultural sectors are being referred to: crop and animal production, aquaculture, fisheries and forestry. These guidelines should thus include a definition in a glossary or footnote.
Paragraph 14 Suggested edits	New policies-governance mechanisms and coordination processes are required to address policy fragmentation and its subsequent negative impact on nutrition <u>and health</u> , ones that are designed and coordinated across sectors such as health, <u>access to land and natural resources</u> , agriculture and food systems, education, environment, water, sanitation, gender <u>equality</u> , social protection, <u>industry</u> , trade, employment, <u>migration</u> and finance – all of which impact nutrition <u>and health</u> outcomes.
Paragraph 15 General comments	<ul style="list-style-type: none"> Important to make link to other relevant HLPE reports (e.g. on Multi-Stakeholder Partnerships) and Voluntary Guidelines (e.g. VGGT and CFS-RAI). This para on the policy/CFS process could perhaps go into a preface? <p>With reference to “evidence”:</p> <ul style="list-style-type: none"> What about scientific evidence generated after the HLPE was released? Perhaps the HLPE should not be the only source of scientific evidence here.
Paragraph 15 Suggested edits	The Committee on World Food Security (CFS) has undertaken a policy process to produce Voluntary Guidelines on Food Systems and Nutrition (VGFSyN). The preparation of these Guidelines is informed by the findings and scientific evidence provided in the High Level Panel of Experts on Food Security and Nutrition’s (HLPE)⁴ Report on Nutrition and Food Systems: and on “Multi-Stakeholder partnerships to finance and improve food security and nutrition in the framework of the 2030 Agenda” (http://www.fao.org/3/CA0156EN/CA0156en.pdf). The preparation of the VGFSyN is also informed by a consultation process that took place between May and November 2019, which involved participation of CFS stakeholders in meetings in Rome, Ethiopia, Thailand, Hungary, Egypt, Panama, and the United States of America, as well as through an E-Consultation.
Paragraph 16 General comments	<ul style="list-style-type: none"> This para on the policy/CFS process could perhaps go into a preface? The frameworks listed, as part Agenda 2030, are only focusing on nutrition. A mention to policy frameworks related to food safety, food loss and waste reduction should be mentioned at least. <p>With reference to “essential component”:</p> <ul style="list-style-type: none"> Essential components? What is the reference point? Food Systems or Food Systems and Nutrition? <p>With reference to “achieving the goals of the 2030 Agenda”:</p> <ul style="list-style-type: none"> Could refer here to the Global Sustainable Development Report 2019 that identifies food systems as one of six entry points for achieving sustainable development. https://sustainabledevelopment.un.org/content/documents/24797GSDR_report_2019.pdf
Paragraph 16	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

⁴ 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.

Suggested edits	<p>increased attention from the global community, including the United Nations (UN) and its Member States, and <u>isare</u> recognized as an essential component of 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 <u>of the United Nations</u> (FAO) and the World Health Organization (WHO) committed to ending hunger and malnutrition in all its forms⁵. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025)⁶ 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 CFS. Specific attention on nutrition was given by a number of UNGA Resolutions⁷, the UN Economic and Social Council (ECOSOC)⁸, the UN Environment Assembly⁹, the World Health Assembly (WHA)¹⁰ and the UN Special Rapporteur on the Right to Food¹¹. <u>Lastly, The VGFSyN recall and reaffirm the commitments under the adopted Rome Declaration on World Food Security (1996), Declaration of the World Food Summit: five years later (2002), the Declaration of the World Food Summit (2009).</u></p>
Paragraph 17 General comments	<ul style="list-style-type: none"> • More relevance should be given to SDG 12: sustainable consumption and production. <p>With reference to “evidence-based”:</p> <ul style="list-style-type: none"> • The guidelines are stated to be evidence-based guidance that address malnutrition in all its forms from a food systems perspective. We would be grateful to learn what “evidence-based” means from the concept phase of this VG development. For instance, are the guidelines referring to policy measures that intend to support the promotion of healthy diets in a given context for which good practice examples currently exist? Perhaps, instead of evidence-based, we should refer to evidence-informed VG. We look forward to receiving the literature list that supports each guidance given in this document. <p>With reference to “operationalized ICN2’s Framework for Action recommendations”:</p>

⁵ FAO/WHO. 2014. ICN2, [Rome Declaration on Nutrition](#).

⁶ United Nations General Assembly Resolutions 70/259 available at <https://undocs.org/A/RES/70/259> and 72/306 at <https://undocs.org/A/RES/72/306> - The Work Programme of the UN Decade of Action on Nutrition is available at: https://www.un.org/nutrition/sites/www.un.org.nutrition/files/general/pdf/work_programme_nutrition_decade.pdf & https://www.un.org/nutrition/sites/www.un.org.nutrition/files/general/pdf/mv131_rev1_undoa_wp_rev1_en.pdf

⁷ UNGA Resolutions [A/RES/73/2 “Political declaration of the third high-level meeting of the General Assembly on the prevention and control of non-communicable diseases”](#), [A/RES/73/132 “Global health and foreign policy: a healthier world through better nutrition”](#), [A/RES/73/253 “Agriculture development, food security and nutrition”](#).

⁸ [Ministerial Declaration of the 2018 High-Level Political Forum on Sustainable Development](#)

⁹ [Ministerial Declaration of the 2019 United Nations Environment Assembly](#)

¹⁰ 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.

¹¹ [A/71/282 “Interim report of the Special Rapporteur on the right to food”](#)

	<ul style="list-style-type: none"> For this, more concrete recommendations will be needed for countries and stakeholders (since the FFA provided a set of general recommendations already). In this sense the general comment made earlier on legislation is of high importance as the guidelines should encourage legislating and regulating around the recommendations as the key lever to operationalize them. We have seen in many countries that cross-sectoral actions (including for FSN) have only been operationalized when supported by legislation or binding regulatory frameworks, which are usually defined (and assumed) by a majority of stakeholders.
<p>1.2. Background and rationale General comments</p>	
<p>Paragraph 18 General comments</p>	<ul style="list-style-type: none"> As a whole the paragraph is rather weak and avoids mentioning private sector actors that are part of the food system. It's all a bit wishy washy. This section should have explicit reference to the right to adequate food and the right to the highest attainable standard of health. <p>With reference to “evidence-based”:</p> <ul style="list-style-type: none"> What would the guidance look like if it was not evidence-based? What is the nature of the evidence used? Where in the guidelines are the sections that point to the evidence? Are there a few facts and figures that are considered essential evidence? <p>With reference to “that will address malnutrition in all its forms from a food systems perspective”:</p> <ul style="list-style-type: none"> Shouldn't it rather be: that will address how to ensure access to sustainable healthy diets and improved nutrition in food systems?
<p>Paragraph 18 Suggested edits</p>	<p>The VGFSyN are intended to be a reference point that intend to provides evidence-based guidance mainly to governments, specialized institutions and other stakeholders, including international organizations, on <u>adopting a sustainable food systems perspective in the development and implementation of effective legislation and regulatory frameworks</u>, policies, investment and institutional arrangements that will address malnutrition in all its forms. from a food systems perspective.</p>
<p>Paragraph 19 General comments</p>	<ul style="list-style-type: none"> An effort in the previous paragraphs should be done to illustrate eventual food systems inefficiencies and malfunctioning as causes of the effect: all forms of malnutrition. The objective CFS Voluntary Guidelines on Food Systems and Nutrition is stated as to “contribute to reshaping or promoting food systems to ensure that the food that contributes to sustainable and healthy diets is available, affordable, acceptable, 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’””while also addressing the challenges of social, environmental and economic sustainability”. In tackling the sustainability challenge, the draft text uses the terms ‘sustainable development’, ‘sustainable food systems’, ‘sustainable food production,

	<p>‘sustainable use of resources’, ‘sustainable technologies’, and, most frequently, ‘sustainable and healthy diets’.</p> <ul style="list-style-type: none"> • Is the given objective really this limited? It is not clear that the dimensions of sustainability across the entire system are reflected in this objective. It is imbedded in the “sustainable and healthy diets” but seems lost in this statement. The language in paragraph 33 may be better. • This objective seems to be very much linked to the consumption aspect of food systems / access to sustainable and health diets, and not that much to the production dimension. I think that we should also promote a certain type of agriculture, which should be able to: ensure an overall socioeconomic inclusion of poor and vulnerable populations, be respectful of the environment, and adapted to the evolution of the climate. <p>With reference to “reshaping”:</p> <ul style="list-style-type: none"> • Transformative actions is referred to here?
<p>Paragraph 19 Suggested edits</p>	<p>The objective of the VGFSyN is to contribute to reshaping, preserving or <u>preserving and</u> promoting food systems to ensure that the food that contributes to sustainable and healthy diets is <u>accessible</u>, available, affordable, acceptable, 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”¹²; <u>and that its production, processing, transporting and retailing contributes to inclusive and sustainable economic development and decent job creation. The VGFSyN are meant to provide guidance on how food systems can address all forms of malnutrition while contributing to the realization of the human right to adequate food, and ensuring the sustainable use of natural resources and the preservation of biodiversity.</u></p>
<p>Paragraph 20 General comments</p>	<ul style="list-style-type: none"> • Where does governance come in? <p>With reference to “health sectors”:</p> <ul style="list-style-type: none"> • It seems that the guidelines do not fully exploit the potential of the health sector for improving nutrition. The health sector is invoked in a couple of instances when talking about nutrition education or women of reproductive age, but its role is broader encompassing all age-sex groups. <p>With reference to “economic sustainability”</p> <ul style="list-style-type: none"> • It is unclear to what extent evidence on the economic sustainability of the proposed actions has been considered. On a related note, the guidelines call for investment in multiple areas, some of which would need to be heavily subsidized. And their implementation would require strengthening and increasing the expert human resource base in many countries. This calls into question the feasibility of the guidelines as a whole.
<p>Paragraph 20 Suggested edits</p>	<p>The VGFSyN follow<u>s</u> a comprehensive, systemic, and evidence-based approach to addressing policy fragmentation with a special emphasis on the food, agriculture, <u>access to land and natural resources, environment, social</u> and health sectors, while also addressing in order to respond to the challenges of social, environmental, <u>cultural</u> and economic sustainability. The VGFSyN are <u>expected to address the complexity of food</u></p>

¹² FAO/WHO. 2014. ICN2, [Rome Declaration on Nutrition](#). Paragraph 5.b.

	<u>systems with the intention to ensure policy coherence and foster and guide dialogue among different institutions and sectors.</u>
Paragraph 21 General comments	<ul style="list-style-type: none"> • This paragraph sounds like the guidelines are mainly addressed to intergovernmental forums/actors/mechanisms. But states can also act at the national level, and should find material in these guidelines to do so. • Not only is there a "need to refer to, and build upon, existing international commitments", but also to legally-binding obligations in certain cases • Suggested edit "land tenure" inserted because it may be one of the most relevant issues affecting -particularly small-scale producing nutritious foods - food systems. • Added few sectors that are traditionally linked to food systems, and modified the sentence as originally, the spectrum of sectors that have been considered, seems to be too narrow to take into account the economic, social and environmental dimensions of those guidelines. <p>With reference to "trade and investment, ... among others":</p> <ul style="list-style-type: none"> • How do the areas mentioned here relate to the list of guidance in para 26? Should there be a listing of the normative intergovernmental processes covering the areas mentioned here, in particular as they are not the same as those in para 26?
Paragraph 21 Suggested edits	Food systems are integrally <u>traditionally</u> connected with issues related to <u>agriculture and agribusiness, energy, water and soil</u> , trade and investment, <u>land tenure</u> , food safety, climate change, biodiversity and genetic resources, <u>access to land and natural resources</u> , among others, which are likely all addressed in dedicated normative intergovernmental processes. Different actors dealing with these matters need to refer to, and build upon, existing international commitments, promoting coherence and addressing the current policy fragmentation, without duplicating efforts or moving beyond their mandates.
Paragraph 22 General comments	<ul style="list-style-type: none"> • Can we highlight some of these important food systems like indigenous food systems?
Paragraph 22 Suggested edits	The VGFSyN are intended to be global in scope and to provide guidance to policy-makers and relevant stakeholders when designing context-specific policies, <u>legislation and regulatory frameworks</u> , 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.
Paragraph 23 Suggested edits	Moreover, the VGFSyN provide guidance to relevant actors involved in humanitarian contexts in order to bridge the gap between humanitarian and development work and integrate nutrition and long er -term strategies for sustainable development into emergency and humanitarian responses, with a view toward strengthening the resilience and adaptive capacity of food systems.
Paragraph 24 General comments	<ul style="list-style-type: none"> • This para is neither about objectives nor purpose, rather it is explanatory. Could it be moved somewhere to background? Otherwise it should be reformulated to say that the objective is to also take into account various areas outside of agriculture and food policies. • Suggested edit "agricultural policies", and this should go as far as to include it for fisheries, forestry, etc., with particular focus on common access goods

	<p>With reference to “drivers”:</p> <ul style="list-style-type: none"> • Suggest to include explicitly youth’s right and empowerment as well as employment and working conditions among the drivers, due to their well-known impact of on poverty and malnutrition. Also, suggest moving inequalities and poverty from the socio-cultural category to the political and economic one. <p>With reference to “innovation” under b):</p> <ul style="list-style-type: none"> • Innovations to be measured against sustainability and should be acceptable, available and affordable by all, including the most vulnerable people. <p>With reference to “leadership” under c):</p> <ul style="list-style-type: none"> • What is meant by leadership in this context? Only foreign investment or foreign and domestic? Only food policies or food and agricultural policies? • The selection of political and economic drivers jumps a bit between very general (globalization) and very specific (land tenure). One could add macroeconomic drivers/environment to cover broader economic developments. • Social protection policies: referred here to the important role of food subsidies, school feeding programmes, food/cash transfers, or also to other type of social protection interventions that influence the food systems, its diversity and the cost of diet.
<p>Paragraph 24 Suggested edits</p>	<p>The functionality of food systems and their ability to deliver sustainable and healthy diets is influenced by a number of drivers which indicate that, in order to improve nutrition <u>and health</u>, context specific changes are needed not only in agriculture and food policy but also in development priorities, economic policies, and social <u>and cultural</u> norms. These drivers can be categorized as follows:</p> <ol style="list-style-type: none"> a) biophysical and environmental (<u>land</u>, natural resource and ecosystem services, <u>wild and domesticated</u> biodiversity, <u>protected areas, endangered and protected species, use of alien and invasive species, biosafety and genetic resources</u>, climate change, water, and soils <u>and pollution</u>); b) <u>knowledge, culture</u>, innovation, technology, and infrastructure; c) political and economic (leadership, globalization, foreign <u>and domestic</u> investment, trade, food <u>and agricultural</u> policies and regulatory frameworks, <u>social protection policies, poverty, inequalities, employment and working conditions</u>, land tenure, conflicts, and humanitarian crises); d) socio-cultural (culture, religion, rituals, social traditions, poverty, inequalities, and <u>human youth’s and women’s</u> rights, <u>youth</u> and <u>women’s</u> empowerment); e) demographic drivers (population growth, age distribution, urbanization, migration, and forced displacement).
<p>Paragraph 25 Suggested edits</p>	<p>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 and other international human rights instruments <u>such as the United Nations Declaration on the Rights of Indigenous Peoples</u>, and with due regard to voluntary commitments under applicable regional and international instruments. CFS guidance should build on and integrate existing instruments and frameworks for action adopted in the context of the UN system, including Member States-endorsed guidance and recommendations <u>endorsed by Member States</u>.</p>

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Paragraph 26 General comments	<p>With reference to “expected to build up and complement”:</p> <ul style="list-style-type: none"> Eventually this language needs to be amended. Either they do or they don't. At the moment of course there is no certainty about whether they will or not.
Paragraph 26 Suggested edits	<p>VGFSyN are expected to build upon and complement related guidance contained in other CFS products, and are intended to avoid duplication of the work and mandate of other international bodies. In order to ensure policy coherence, specific attention should be paid to:</p> <ul style="list-style-type: none"> CFS 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), and CFS Framework for Action for food security and nutrition in protracted crises – FFA (2015) CFS Policy Recommendations on Connecting Smallholders to Markets (2016).
Paragraph 27 General comments	<ul style="list-style-type: none"> It is very important to add legislative frameworks as public policies are not enforceable against third parties. Legislation is needed for that. <p>With reference to “farmer organizations”:</p> <ul style="list-style-type: none"> Just farmers is too limiting.
Paragraph 27 Suggested edits	<p>The VGFSyN are primarily targeted at governments to help them design public policies <u>and regulatory frameworks</u>. They are also meant to be used in policy discussions and implementation processes by relevant stakeholders such as:</p> <ol 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 agencies of the UN; <u>c) Civil society organizations, including those representing indigenous people, vulnerable groups and communities;</u> <u>d) Indigenous peoples including their governance systems, institutions, and their UN Bodies¹³</u> <u>e) Private sector, including big firms as well as small associations representing food processors, traders, retailers, transporters and medium enterprises, international food companies;</u> <u>f) Research organizations, academics and universities;</u> <u>g) Development partners, including international financial institutions;</u> <u>h) Private donors, foundations and funds;</u> <u>i) Consumer protection associations;</u> <u>j) Farmer-Agricultural producer organizations;</u> <u>k) Pastoralists and -small fishers and their representatives’ organizations.</u>
Part 2	<ul style="list-style-type: none"> There must be a better correlation between food systems and the right to food. Part 2 leads the reader to believe that there is a menu of concepts that concerns

¹³ [UN Permanent Forum on Indigenous Issues \(UNPFII\), the Special Rapporteur on Indigenous Peoples \(SRIP\) and the Expert Mechanism on the Rights of Indigenous Peoples \(EMRIP\);](#)

<p>General comments</p>	<p>food systems but they all are different and separate pieces of the food systems. This is not the case. The Right to Food is an overarching goal that is only achieved IF food systems are sustainable.</p>
<p>2.1. Key concepts concerning food systems and nutrition General comments</p>	<ul style="list-style-type: none"> • Since it is mentioned repeatedly in the document, and it seems to be one of the pillars of the guidelines, the concept “food system approaches”, or “sustainable food systems approaches” should be defined and agreed upon (i.e. what is meant by “integrating a food system approach to policies and investments?”) • Suggest to include “food environments”. • Some additional concepts would benefit from being defined herein as well, such as availability, accessibility, etc. • There is a more complete FAO definition of "Food Systems": FAO defines the food system as: “encompass[ing] the entire range of activities involved in the production, processing, marketing, consumption and disposal of goods that originate from agriculture, forestry or fisheries, including the inputs needed and the outputs generated at each of these steps. Food systems also involve the people and institutions that initiate or inhibit change in the system as well as the sociopolitical, economic and technological environment in which these activities take place” (http://www.fao.org/3/i3300e/i3300e.pdf) • Food systems approach: Food system approach is a departure from traditional approaches to improving food security and nutrition, which tended to be sectoral with a narrowly defined focus and scope, and addresses these limitations by taking a holistic and comprehensive view of the entire system – from inputs and production, through processing, storage, transport and retailing, to consumption to the actors within it and governance mechanisms that shape their function. • Food systems lens and thinking: Food systems thinking identifies and describes the drivers and relations in the systems through feedback loops, delays and non-linear relationships. • Essential components of healthy diets can be included in this paragraph. • Sustainable and healthy are two separate concepts, and not interchangeable. One does not exclude the other. Sustainability is a quantity and process-valued concept – avoidance of the depletion of natural resources in order to maintain an ecological balance over time. Healthy is a qualitative but also process-valued concept. Both of them must be addressed and provided guidance on in this document. The realization of the right to food for all, automatically ensures this, because realizing the right to food and its core, as per agreed international binding normative means: <i>to have access to culturally and consumer-adequate and sustainable food which is environmental-friendly, affordable, available, free from adverse substances hence safe, food</i>. Hence, the notion of sustainability is intrinsically linked to the notion of adequate food, implying such adequate food being accessible for both present and future generations.
<p>2.1. Key concepts concerning food systems and nutrition</p>	<p><u><i>Traditional and indigenous food systems include indigenous peoples, pastoralists and small fishers, which encompass means of generating food that go beyond the production only and where traditional knowledge and holistic approach to food play an essential role in the sustainability of the food system. Traditional food systems relate to “traditional livelihood practices [which] include small-scale farming, pastoralism, shifting cultivation,</i></u></p>

<p>Suggested new concepts for inclusion</p>	<p><i><u>fishing, hunting, gathering and other forms of wild harvesting, or a combination of such practices. Such traditional livelihoods provide for sustainable management of resources, biodiversity and ecosystems, and are based on traditional knowledge, reciprocal labour and traditional agricultural calendars</u></i>¹⁴.</p> <p><i><u>Balanced diets are based on a diversity of unprocessed or minimally processed foods balanced across food groups, including an abundance of wholegrains, legumes, vegetables, nuts and fruits. Balanced diets are sustained by the local biological diversity, which guarantees diversity in agriculture and food, and should preserve that biodiversity.</u></i></p>
<p>Paragraph 29 General comments</p>	<ul style="list-style-type: none"> The ‘definition’ of sustainable food systems here should read: ‘are food systems that ensure the realization of the right to food hence ensuring food security and nutrition for all in such a way that the economic, social, cultural and environmental bases to ensure such right and generate food security and nutrition of future generations are not compromised.’ Please note that as per the General Comment 12 by the CESCR, sustainability is an essential dimension of the right to food, part of its normative content. See: https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=E%2fC.12%2f1999%2f5&Lang=en (para 6, 7).
<p>Paragraph 30 General comments</p>	<ul style="list-style-type: none"> The role of biodiversity in ensuring agriculture and food biodiversity (necessary for balanced healthy diets) needs to be highlighted. One could make reference to the UN agreed language in resolution 73/2: “healthy and balance sustainable diets” (par. 34 of https://undocs.org/pdf?symbol=en/A/RES/73/2).
<p>Paragraph 30 Suggested edits</p>	<p><i>Sustainable and healthy diets</i> “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”¹⁵.</p>
<p>Paragraph 31 General comments</p>	<ul style="list-style-type: none"> "For the Special Rapporteur, the right to food is the right to have regular, permanent and unrestricted access, either directly or by means of financial purchases, to quantitatively and qualitatively adequate and sufficient food corresponding to the cultural traditions of the people to which the consumer belongs, and which ensure a physical and mental, individual and collective, fulfilling and dignified life free of fear. This definition is in line with the core elements of the right to food as defined by General Comment No. 12 of the United Nations Committee on Economic, Social and Cultural Rights (the body in charge of monitoring the implementation of the International Covenant on Economic, Social and Cultural Rights in those states which are party to it). The

¹⁴ [FAO Term \(Indigenous Peoples Forum, IFAD, 2015\)](#)

¹⁵ Adapted from [FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome](#)

	<p>Committee declared that “the right to adequate food is realized when every man, woman and child, alone or in community with others, has physical and economic access at all times to adequate food or means for its procurement. The right to adequate food shall therefore not be interpreted in a narrow or restrictive sense which equates it with a minimum package of calories, proteins and other specific nutrients. The right to adequate food will have to be realized progressively. However, States have a core obligation to take the necessary action to mitigate and alleviate hunger even in times of natural or other disasters.”</p> <ul style="list-style-type: none"> • This definition can be certainly expanded. Initially, the idea was to keep it short but this definition, albeit correct, is not providing the reader with the comprehensive normative basis which is required to realize such right. It would be important to ensure that the Guidelines clearly acknowledge the normative content of the CESCR’s General Comment 12, as a basis to the guidance they provide. Language is herewith proposed as an example.
2.2. Guiding principles for reshaping or promoting sustainable food systems General comments	<p>With reference to “reshaping”:</p> <ul style="list-style-type: none"> • In some cases we need transformative actions which is more than just re-shaping. • Current food systems need reshaping and sustainable food systems shall be "shaped". • One thing that is not emphasized enough is the fact that multiple food systems interact within and across each other. National food systems have many levels and might not be at all similar to each other. We should say that the guidelines should be able to be applied at multiple levels of governance and produce synergies that can react across multiple contexts.
2.2. heading Suggested edits	GUIDING PRINCIPLES FOR RESHAPING, PRESERVING OR AND PROMOTING SUSTAINABLE FOOD SYSTEMS
Paragraph 32 General comments	<ul style="list-style-type: none"> • Perhaps mentioning the link between producers and consumers as created by food systems could also be worth here.
Paragraph 32 Suggested edits	Food systems serve and support multiple objectives within the three dimensions of sustainable development. While food systems might differ greatly, they offer important opportunities for public policies, <u>legislation and regulatory frameworks</u> , mechanisms, instruments and investments that aim to advance the goals of the 2030 Agenda for Sustainable Development.
Paragraph 33 Suggested edits	The VGFSyN include a number of guiding principles ¹⁶ that should be followed to contribute to reshaping, <u>preserving</u> or promoting sustainable food systems, enabling sustainable and healthy diets, improving nutrition, and promoting sustainable development, <u>and ultimately contribute to the realization of the human right to adequate food for all.</u>
Paragraph 34 General comments	<ul style="list-style-type: none"> • A guiding principle on fair and enforceable rules to ensure that producers, processors, retailers and marketers have an environment that encourages them to reshape the food system and provide affordable and nutritious foodstuffs. This could be a 'rule of law' principle, or it could even be formulated as a trade related principle. Not having any principle in this direction is a serious gaps. It can be

¹⁶ These guiding principles make reference to already agreed international documents and tools, such as the Rome Declaration on Nutrition and the Framework for Action of ICN2.

	<p>formulated in a way that does not put the private sector actors as evil, just that under current regulatory systems, market pressures lead to numerous ways that undermine the objectives of a fair food system leading to the realization of the right to adequate food.</p> <ul style="list-style-type: none"> • Para. 34 is a mix of principles, approaches and actions. For instance it asks to promote an ‘evidenced based approach’, ‘evidenced –based policy’ and ‘capacity building’. Not all are at the same level. The section could be tightened to underline those main principles that are directly linked to the objective stated in Para. 19. • Among the guiding principles, we suggest including a principle on the role of children and youth – see text below under f). This builds on the demographics of most developing regions and the consequent acknowledgment that youth are indeed already the present and the future of food systems. As youth leaders, students, and young entrepreneurs youth are in the position to significantly contribute to the adoption of sustainable and healthy diets, while bringing innovation. See also the Draft CSM Youth Vision (September 2019) at http://www.csm4cfs.org/working-groups/youth/ • Furthermore, guiding principle on legislative frameworks should be added (see last added one), which should be part of the overall premise of the Guidelines (language is just proposed as an example). In order to strengthen adherence to previously adopted and endorsed policy instrument, these Guidelines should too provide clear, positive and forth-coming language on how to ensure that regulatory legislative frameworks can increase protection respect and fulfilment of human rights (such as legislation on children marketing practices, fair and transparent labelling etc.) and therefore of policy measures that are conducive to truly sustainable food systems and nutrition. It is of utmost importance that the involvement of the private sector in national food systems, while beneficial and desirable is carefully regulated. At the moment, the document lacks attention to the rule of law and conflict of interest with the private sector and other players. • This list should also include a principle on building the evidence on sustainable food systems. Due to the complex nature of food systems it is extremely difficult, if not impossible, to identify optimal solutions considering all actors, impacts and sustainability dimensions at local, national and global level. Much more research will be needed to build the scientific basis for most of the principles listed here. • One guiding principle could also deal with sustainable production and consumption to ensure that quality food is available and properly consumed to ensure nutrition and healthy diets. This has also to do with the reduction of post-harvest losses, including quality losses due to handling and management inefficiencies, and food waste from retail to consumers level. • Promoting transformation of current food systems’ structures and governance could be an element to highlight in the guiding principles. • Moreover, monitoring and evaluation of policy implementation and learning sharing would make the guiding principles complete. <p>With reference to ‘guiding principle a’:</p> <ul style="list-style-type: none"> • Indeed, sustainability must start from grassroot level, local actors must be at the centre of our actions, bottom-up and people-centred approaches, participation
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	<p>and accountability are key. Local realities must be at the centre. Rural areas and the rural poor, including landless, LGBT, disable, the elderly, indigenous peoples and groups, children, women and youth, they all require specific interventions which be tailored around them and to their needs. Specific assessments to understand who those left behind, marginalized, and most vulnerable are, must be undertaken in order to ensure we look into the root causes of hunger and malnutrition in food systems. These assessments should be used to guide implementation, monitoring and evaluation of policy action to ensure sustainability for future generations.</p> <p>With reference to ‘guiding principle b’:</p> <ul style="list-style-type: none"> • This appears to be a contradiction to principle a): systemic and holistic approach versus context-specific policies. How can principles a) and b) complement each other? Policies that are good in a specific context are not necessarily beneficial from a holistic point of view and the other way around. <p>With reference to ‘guiding principle c’:</p> <ul style="list-style-type: none"> • Accountability of citizens and states, especially certain states from which multinationals are not curbed within the food systems affecting less developed states with less bargaining power to ensure economic, social and environmental sustainable action. <p>With reference to ‘guiding principle d’:</p> <ul style="list-style-type: none"> • Water should be highlighted under “ecosystems” as well. <p>With reference to ‘guiding principle e’:</p> <ul style="list-style-type: none"> • Leaving no one behind: The equality of access and opportunity could be included under the right to food. The SDG exhortation to ‘leave no one behind’ provides good leverage for bringing issues of equity in food systems front and center in this Note. • Although both equality and equity are important, there is an essential difference among these terms. Suggest to include gender equality and not equity to be consistent with FAO’s Policy. Equality and equity are not interchangeable concepts. Equality is about sameness, equity is about fairness. Equality is a term strongly tied to women's rights and transformative approaches, while equity refers to fairness of treatment for women and men, sometimes ignoring their differences. http://www.fao.org/3/a-i3205e.pdf The VG should include both concepts as they refer to different dimensions. Echoing the intervention by the UN OHCHR and other actors during the OEWG, especially when speaking of women, equality is extremely crucial, equity alone is not enough. <p>With reference to ‘initial guiding principle f – now g in the text below’:</p> <ul style="list-style-type: none"> • Food and nutrition knowledge and awareness - to well understand nutrition, people need to better understand food and where does it come from, how to prepare it - not only for nutrition, but also for safe issues- etc. The loss of contact and knowledge about food and agriculture of most of people today is one important factor of the loss of diet, nutrition and taste references with the negative impacts on health; While nutrition knowledge can be very complex to integrate at various individual levels, related food and taste education is a good approach to disseminate healthier food production and consumption behaviour
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	<ul style="list-style-type: none"> • Nutrition awareness – besides training of health professionals, could, Agriculture Extension officers be included as well? Especially, on basic nutrition-sensitive Agriculture promotion, they also need knowledge in this area so that they can share with the farmers. • Suggest using food literacy or nutrition capacities instead of “awareness”. Food and nutrition capacities encompass a cluster of skills, knowledge and motivations to be able to practice adequate food-related behaviours. • The terms nutrition knowledge, education, awareness, information, and literacy, are loosely used here and in section 3.4. Please see detailed comments in this regard in section 3.4. • Can Agriculture Extension Officers receive basic nutrition sensitive Agriculture training as well? They need nutrition knowledge to raise awareness with the farmers at the community level. • “facilitate producers’, food processors’”: This would need to be in tandem with other interventions that tackle stronger influences on such groups’ decisions (market, financial, etc.). Nutrition is typically not of interest of producers and food processors unless there are economic incentives. • “health professionals’’: Not only health professionals, there are many other professionals and practitioners that work within the food system. Either to include the most relevant or suggest to go in depth in the section related to nutrition education below. At the same time, training on nutrition is not really effective to support people’s food learning processes, the training needs to be focused on nutrition education for behavior change and pedagogy. Training on “nutrition” in health professions typically means teaching about nutrients and human digestion and metabolism, but this knowledge alone is by far not enough for them to be good agents of behavior change. • “should be trained on nutrition’’: Not only on nutrition, but on nutrition education and behavior change approaches: for health professionals to understand the psychosocial determinants of dietary choices and to better assist individuals in making dietary changes. <p>With reference to ‘initial guiding principle g – now h in the text below’:</p> <ul style="list-style-type: none"> • The human rights-based approach includes the principles of participation, accountability, non-discrimination, transparency, human dignity, empowerment and equality, and the rule of law. These are already spelled out in the document and made reference to, throughout. And thus the realization of the right to adequate food is rather an overall guiding objective, not another principle. All the principles here listed, contribute to its realization. Consequently, principle g) should rather be the adoption of a human rights-based approach to ensure that the overall guiding objective is realized. Mind that the Right to Food Guidelines, adopted by Consensus of Member States, in its Introduction clearly state that the human rights-based approach is the way to achieve the outcome of those Guidelines. See pp 7. It goes without saying that the right to food and the human rights-based approach are not just empty goals or principles, they bring with themselves specific measures and actions that are needed to ensure their
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	<p>application and realization. More to this will be highlighted in subsequent comments.</p> <p>With reference to ‘initial guiding principle h – now i in the text below’:</p> <ul style="list-style-type: none"> The general trend in the international development community is to replace the term “capacity building” with “capacity development”. The shift in terminology reflects an evolution from an original concept of an essentially externally-driven process in which there were no pre-existing capacities, to a new concept that places strong emphasis on national ownership and on endogenous change processes. <p>http://www.fao.org/fileadmin/user_upload/newsroom/docs/Summary_Strategy_PR_E.pdf</p>
<p>Paragraph 34 Suggested edits</p>	<p>These guiding principles are:</p> <ol style="list-style-type: none"> Systemic, holistic and evidence-based approach. Promote a systemic, multi-sectoral, <u>intercultural</u>, and science and evidence-based approach that <u>includes engagement with the domestic and international food industry and</u> considers food systems in their totality, integrates indigenous <u>peoples’ knowledge</u> and traditional forms of knowledge, seeks to simultaneously maximize outcomes, <u>while respecting the principle of the free, prior and informed consent</u>, across all sustainability dimensions <u>and recognizes the trade-offs among them</u>, and looks at the multidimensional causes of <u>food insecurity and</u> malnutrition in all its forms. Coherent and context-specific policies. Contribute to the formulation and implementation of coherent, context-specific, <u>intercultural</u>¹⁷, <u>participatory</u> and evidence-based policies and related investments through coordinated actions among different actors and across all relevant sectors at international, regional, national, <u>and</u> subnational, and local levels. Governance, transparency and accountability. Support efforts in strengthening governance and accountability mechanisms that contribute to fostering citizen <u>and communities’</u> participation in national <u>and/or decentralized</u> debates on food security and nutrition <u>and food systems</u>, and transparent and inclusive decision-making processes <u>that give voice to civil society</u>. Healthy people, healthy planet. Promote policies that enhance the livelihoods, health, and well-being of the population <u>without discrimination</u>, ensuring sustainable food <u>generation</u>, production and consumption <u>through all the value chain</u> as well as the protection <u>and sustainable use</u> of biodiversity and ecosystems. <u>Making sure that these policies do not harm communities and indigenous peoples’ identity and collective way of life, and include specific measures and provisions that have been recognized and discussed by these peoples as important for their ways of understanding wellbeing, development, spirituality and progress.</u> Gender equity-equality and women’s empowerment. Promote gender <u>equity-equality</u> and women’s and girls’ empowerment, <u>their access to productive</u>

¹⁷ Refers to interculturality and the “existence and equitable interaction of diverse cultures and the possibility of generating shared cultural expressions through dialogue and mutual respect”. UNESCO (2005), the 2005 Convention for the Protection and Promotion of the Diversity of Cultural Expressions

	<p><u>resources</u>, promoting and fulfilling their rights and considering the importance of creating the conditions for women’s involvement in decision-making and strong engagement in shaping food systems that improve nutrition, given their key role in <u>food production</u>, care, education, economy, health promotion and food consumption.</p> <p>f) Children and youth empowerment and engagement. <u>Promote the exposure of children and youth to garden-based nutrition interventions and the empowerment of the young generations to boost their involvement in decision-making and strong engagement in shaping food systems that improve nutrition, advancing their access to decent work and entrepreneurship opportunities.</u></p> <p>f)g) Food and nNutrition knowledge and awareness. Strengthen <u>intercultural nutrition education, knowledge and literacy food and nutrition capacities</u> at individual and community levels to facilitate <u>communities’, producers’, food processors’ and other value chains actors including small and medium enterprises’</u> and consumers’ decisions and to foster informed choices about food products for sustainable and healthy dietary practices. Health professionals, especially, should be trained on nutrition, <u>including education and behavior change approaches.</u> <u>Agriculture Extension Officers should receive basic nutrition-sensitive agriculture training as well.</u></p> <p>g)h) Realization of the Right to Adequate Food. Promote the progressive realization of the right to adequate food in the context of national food security going beyond ensuring minimum requirements and including access to food that is nutritionally adequate <u>and availability of high-quality food by reducing post-harvest losses due to inefficiencies of handling, processing and management of food in the value chain.</u></p> <p>h)j) System-wide cCapacity development. building. <u>To achieve sustainable results at scale, apply a system-wide capacity development approach that empowers people, strengthens organizations, institutions and networks as well as a more conducive policy environment¹⁸.</u> Strengthen human and institutional capacities, particularly among <u>governance systems of traditional food systems,</u> nutrition and food system actors, <u>to preserve and and the domestic and international food industry, to</u> reshape food systems <u>in a country-driven matter</u> to deliver sustainable and healthy diets, and to promote adequate food habits: <u>and to develop a food industry that appropriately responds to the health and nutritional requirements of consumers.</u></p> <p>i) Regulatory mechanisms and sound legislative frameworks. <u>Sound constitutions and legislation offer the highest level of protection to ensure coherence to relevant policies and programmes and their implementation.</u></p>
Part 3	<ul style="list-style-type: none"> • Part 3 is virtually silent on the aspect of monitoring and accountability.

¹⁸ See page 38 “System-wide capacity development for country-driven transformations” in “Feeding People- Protecting the Planet: FAO and the GEF partners in Action”, FAO, 2018.

General comments	
Paragraph 35 General comments	<p>With reference to “principles of the right to adequate food”:</p> <ul style="list-style-type: none"> • If it refers to the PANTHER principles, or the HRBA principles, it would be important to list them (maybe with a few words for each) in a footnote. <p>With reference to “people and organizations”:</p> <ul style="list-style-type: none"> • Should it be understood as economic and social organizations?
Paragraph 35 Suggested edits	<p>The VGFSyN provide guidance on actions at multiple points across food systems, recognizing that food systems are interconnected and that any action to address one part will impact another. These actions can have both benefits and unintended consequences. <u>Resilient, sustainable and diverse food systems are supported by agricultural production methods in which biodiversity is an essential pillar. Biodiversity for food security, nutrition and human health underpins all diversified food systems.</u> Founded upon the principles <u>ensuring the full realization</u> of the <u>human</u> right to adequate food, the VGFSyN provide a framework to promote <u>sound legislative frameworks</u>, policy coherence and to bring various stakeholders – people and organizations – who are involved in food systems to work holistically and together to deliver sustainable and healthy diets for optimal nutrition <u>outcomes and health</u> outcomes, <u>and as well as sustainable use and preservation of biodiversity and natural resources.</u></p>
Paragraph 36 General comments	<p>With reference to “policy entry points, tools and mechanisms”:</p> <ul style="list-style-type: none"> • The VGFSyN provide only basic principles but concrete tools and mechanisms are not shown. For example, item 3.2.1 a) “... States should encourage the use of ecosystem services which maintain soil biodiversity and nutrient balance, and promote carbon storage”. Whom should the states encourage, and how? <p>With reference to “with governments being critical”:</p> <ul style="list-style-type: none"> • What about inter-governmental arrangements and processes? If the challenge of malnutrition is global, and if transactional actors hold such sway in the way food systems are structured globally, then answers can’t be left to governments and national actors alone. This, the issue of the transnational governance of food systems through inter-governmental processes and international cooperation is something missing in this Note.
Paragraph 36 Suggested edits	<p>The VGFSyN provide policy entry points, tools, and mechanisms across the <u>food systems considered and its</u> constituent elements of food systems, namely food supply chains¹⁹, food environments²⁰, and consumer behaviour²¹. They provide a range of actions that States, and other actors each with their unique and distinct roles and responsibilities, can consider to improve food systems to achieve better nutrition outcomes, with governments being critical in orchestrating effective enabling environments.</p>

¹⁹ 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

²⁰ Food environments “refer to the physical, economic, political and socio-cultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food”. HLPE 2017b

²¹ 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

<p>Paragraph 37 General comments</p>	<ul style="list-style-type: none"> • It would be recommended to have an entire section devoted to regulatory measures. • To flag is the reverse side of the coin in terms of food accessibility to consumers. Since most of the poorest are small-scale farmers or smallholders, and given their contribution to food systems, I think a dimension that considers their fair remuneration and their empowerment is fundamental as a compliment to ensuring accessibility of sustainable/healthy diets. Hopefully this can be considered in the governance and/or actions taken to ensure accessibility. • Not in all cases the titles of the six areas match with the wording or the contrary of the sub-sections? <p>With reference to “people are central”:</p> <ul style="list-style-type: none"> • Are people only central to education efforts? Is this not a framework centred on people? <p>With reference to “humanitarian contexts”:</p> <ul style="list-style-type: none"> • Even if not extensively because this document certainly does not have the ‘space’ to do so, the humanitarian and development nexus is still an important one to address. Coherent humanitarian and development approaches are extremely important and while it is agreed that this document cannot address the complex dimensions of humanitarian aspects, it needs to acknowledge that for one, human rights violations often happen in the context of crises, disasters and transitions. For instance, climate change, which is both a development and humanitarian challenge, must be coherently looked at from all these perspectives.
<p>Paragraph 37 Suggested edits</p>	<p>This part is structured around the following seven<u>six</u> main sections:</p> <ul style="list-style-type: none"> • on governance of food systems which underpins and cuts across the other <u>six</u> five sections; • on food supply chains which determine the <u>production, availability and affordability</u> of safe and nutritious food; • on actions to be taken to ensure accessibility of sustainable and healthy diets; • <u>the notion that people are central to nutrition knowledge and education;</u> • <u>the importance of traditional and indigenous food systems for sustainable and healthy diets</u> • on women’s empowerment in food systems - as they are often the most vulnerable - but with great potential for reshaping food systems for the future; • on humanitarian contexts.
<p>3.1. General comments</p>	<ul style="list-style-type: none"> • This section is missing a section related to regulatory and legislative frameworks which are essential to ensure transparent accountable governance and rule of law. This recalls what mentioned earlier: the realization of the right to food and the human rights-based approach are not just empty goals, they bring with them specific measures and actions that are needed to ensure their application and realization. The document should be coherent with this throughout, if seriously meaning to meet its overall objective.

	<ul style="list-style-type: none"> • One aspect that should be considered in the trade-offs that exist between different dimensions of sustainable food systems and need to be 1) identify/recognize and 2) deal with in transparency to make the " bets" decision - in 31.2. maybe? or 3.1.3 a).
<p>Paragraph 38 General comments</p>	<p>With reference to “from global to local levels”:</p> <ul style="list-style-type: none"> • This can benefit greatly from working with progress being made in territorial approaches/landscape approaches.
<p>3.1.1. General comments</p>	<ul style="list-style-type: none"> • Coordinating multisector actions has always been a challenge – Is there is an effective or successful coordination mechanism or model to suggest to the states that can be easily adapted to their context? And the kind of environment to support this approach? Coordinating multi-sectoral actions is a huge challenge. • With reference to a) “private sector”: • The term private sector is very generic in this context. Suggest that specific references are made to the food industry per se as it is the food companies that governments and the broader community need to engage with for packaged and processed foods. • With reference to a) “marginalized and the most vulnerable social groups”: • This sounds good, but most vulnerable groups are facing many other priorities just to survive. The governments that have been elected are there to represent them and think of the public good in these spaces. • It is possible to include boxes with examples in the guidelines? It is difficult to understand how this could be put into action without concrete examples (e.g. a description of the CONSEA in Brazil would be a perfect example). • With reference to b) “States should facilitate”: • Or lead by ensuring guidance and regulation is there to protect their citizens. • It should be said that states should be designing policy that is inclusive to its citizens, beyond private sector involvement. What comes to mind are policies that tax sugar (Mexico, etc). So instead of saying private sector, we can say that States should facilitate inclusive multi-stakeholder dialogue that considers the needs of private sector as well as the community. • With reference to b) “inclusive dialogue with the private sector”: • While it is important for the food industry to be part of the dialogue, they cannot be allowed to influence public policy making in their favour. This is a critical point that should come out strongly in these guidelines. They should only be involved in policy implementation. Likewise, there should be a point on the need for a better control of activities of transnational food corporations, especially of their rapid penetration in low and middle income country thereby displacing traditional food-systems, in view of protecting regional and national food systems and public health. <p>With reference to c):</p> <ul style="list-style-type: none"> • Shouldn’t the investment and research of private sector actors guide towards public goals of sustainable food systems? • Not necessarily increasing investment, but also improving cost efficiency/cost effectiveness, and/or re targeted investments that are already being made for

	<p>the promotion of healthier diets – taking again the example of food subsidies in Iraq or school feeding programme in Egypt.</p>
<p>3.1.2. General comments</p>	<ul style="list-style-type: none"> • Statement should be linked to para 14. The new policies are the main vehicle to address policy fragmentation, here now it is integrating nutrition into national policies, aligning policies across sectors and setting up multi-stakeholder and multi-sector mechanisms. In the title of the Guidance it may be better to avoid statements implying causality. Either use “Promoting policy coherence” or use “Integrate Nutrition into National Development”. Combining a cause and effect in a title statements makes it much more difficult to come up with a solid listing of action points. • This section is very much about planning and implementation, which in turn are very related to monitoring. There is overlap between Part 3.1.2 and 3.1.3. • National food-based dietary guidelines have great potential to enable policy coherence as they state what a healthy (and in a few countries, sustainable) diet means for the country (optimally following a comprehensive evidence and context-based multisectoral process), yet they are only mentioned in the section about education and product reformulation. http://www.fao.org/nutrition/education/food-dietary-guidelines/en/ • There is space here for adding a territorial dimension to integrating FSN into national development, particularly to reflect the disparities between urban and rural regions and avoid sectoral, topdown, one-size-fits-all approaches. It should be said that alignment but also coordination is fundamental to better FSN policies. <p>With reference to b):</p> <ul style="list-style-type: none"> • Suggest to highlight more clearly the sectors that should be involved. As it is quite broad here, the risk is that it will probably not help the Governments in understanding or knowing the different sectors to be brought on board. <p>With reference to b): “multistakeholder mechanisms”:</p> <ul style="list-style-type: none"> • Some mention of power dynamics in multi-stakeholder mechanisms is needed – i.e. the inclusion of civil society groups and restrictions on participation/power of private sector. In fact, a better term would be “multi-sectoral coordinating bodies”. • Why is agriculture not included? Are we assuming that agricultural policies already incorporate a food systems perspective? This is not necessarily the case. <p>With reference to b) “transparent indicators”:</p> <ul style="list-style-type: none"> • This should be spelled out for countries to understand what indicators they should focus on. • This is very linked to monitoring in the next section. Ideally these indicators would be defined by national intersectoral FSN bodies, based on local context. The process of defining them builds shared understandings and buy-in among the different sectors. However the guidelines could point to some examples (again, Brazil, for example). <p>With reference to c):</p> <ul style="list-style-type: none"> • Economic and social development is not a sector, but a result. Suggest here to talk more specifically about social protection and employment. <p>With reference to d):</p>

	<ul style="list-style-type: none"> • Mention the WHA targets in a footnote.
<p>3.1.3. General comments</p>	<p>With reference to “accountability”:</p> <ul style="list-style-type: none"> • Throughout the document, there is confusion of roles of different actors and lack of a clear recognition of States as those primary responsible for implementing the Guidelines (let alone withholding the obligation to realize the right to food). The dimension of roles and responsibilities needs to be properly articulated, and would give the chance to also spell out duty-bearers and rights-holders dynamics, guide towards stakeholder analysis in order to better understand power dynamics but also help Government understand better their partners and stakeholders. Responsibilities of all stakeholders must be spelled out, including private sectors, institutions, civil society and other actors. Guidance on roles and responsibilities of stakeholders in contexts of national food security: Handbook on Who’s who in the right to food - http://www.fao.org/3/a-i3456e.pdf <p>With reference to “monitoring”:</p> <ul style="list-style-type: none"> • Monitoring is key however in the document it is not clearly stated who is supposed to do what (which brings us back to previous comment). Further guidance, this time on monitoring, can be found here and be used as a general framework: Handbook on general aspects regarding monitoring the right to food - http://www.fao.org/3/a-i3451e.pdf; Handbook on Procedures for monitoring the right to food - http://www.fao.org/3/a-i3452e.pdf; Handbook on Information for monitoring the right to food - http://www.fao.org/3/a-i3453e.pdf; Methodologies: Methods to monitor the right to food I - http://www.fao.org/3/a-i0349e.pdf; Methods to monitor the right to food II - http://www.fao.org/3/a-i0351e.pdf. <p>With reference to “evaluation”:</p> <ul style="list-style-type: none"> • A critical gap in the guidance is the reference to establish a baseline for M+E and accountability mechanisms. What type of food systems are countries starting with? What contributions to they make to nutrition, what are the gaps? What are the systemic entry points for change? Shouldn’t there be a guidance point that calls for countries to establish a baseline of their food systems and the interlinkages with nutrition? <p>With reference to a) “pertain to different food system actors”:</p> <ul style="list-style-type: none"> • What does this mean? Better to say “across the food system”. Again, the example of Brazil: A national multi-sectoral coordinating body, two-thirds civil society reps and one-third reps of relevant government sectors, defined an integrated monitoring framework, with indicators, that served to hold the various actors accountable. In fact the National Budget was even aligned with the national FSN plan. There are also municipal and state-level FSN councils that were part of the system and continue to function now even in the absence of the national council (which was extinguished by the current president). <p>With reference to b):</p> <ul style="list-style-type: none"> • Why start with trade and investment, rather than with a call for a solid baseline in the section on M+E? This is for 3.2.4.; not about monitoring systems. • This para should be removed from the guidelines or redrafted entirely. This is impossible to ensure because the states do not necessarily recognize the priority

	<p>application of international agreements in the national legal system/national legislation. National policies should be brought in line with (or consistent with) multilateral and bilateral trade agreements, but not vice versa. Multilateral and bilateral trade and investment agreements are negotiated by the countries. Once countries committed to them, they usually have an obligation to transfer them into national policies, not the other way round. Moreover, who should assess how health, environmental, social and economic outcomes are likely to be affected? This would need to be done at national level by all involved parties as well as at regional and global level to assess potential externalities. The sentence on competition and market power is quite specific compared to the general quest for sustainability in all three dimensions. Competition and market power would usually be assumed to be part of the other outcomes. Why are they mentioned here explicitly, what are the issues? Concentrated market power does not necessarily mean worse outcomes in the three dimensions. In fact, the linkages are highly complex and cannot be easily assessed.</p> <p>With reference to c):</p> <ul style="list-style-type: none"> • This is not clear. A multi-sectoral information system would need to include information that is relevant to all aspects of the food system, not just food security, diet and nutrition. But I agree that these aspects are essential! • This includes an approach that considers the intersectional factors that reinforce multiples forms of discrimination simultaneously, such as ethnicity, age, gender, class, location, among others. Thus, States need to undertake the necessary level of data disaggregation to ensure robust technical capacity for planning and monitor progress, ensuring no one is left behind. <p>With reference to c) “particularly the dietary intake/consumption of food”:</p> <ul style="list-style-type: none"> • A very important point, that does not come strongly enough in this guidelines, is the need for more and more timely data on individual dietary intake and diet quality. This requires governments’ commitment and substantial investment.
<p>Paragraph 38 Suggested edits</p>	<p>This part of the VGFSyN addresses the governance of food systems for enhancing nutrition <u>while ensuring the sustainable use of natural resources and the preservation of biodiversity</u>. It covers issues of leadership and accountability, from global to local levels, across food systems.</p> <p>3.1.1 Building on multi-sectoral actions and coordination</p> <p>a) States should facilitate an inclusive dialogue ensuring the <u>non-discriminatory</u> participation of a range of <u>food systems</u> stakeholders working with or in food systems, including national and international organizations <u>and institutions, from indigenous peoples</u>, civil society, <u>the private sector including food industry (domestic and international) and the private sector small and medium enterprises</u>, the UN, donors and national researchers. This dialogue should cover all dimensions of food systems, including production, <u>access to land and natural resources, landscape and territorial management, processing, storage, packaging</u>, distribution, marketing and consumption. Marginalized and the most vulnerable social groups should participate in the process of defining policies and strategies at national and local levels to prevent and combat hunger and malnutrition.</p>

Effective and meaningful consultation with indigenous peoples should be ensured, and their free, prior and informed consent obtained, whenever relevant.

- b) Considering the pivotal role of the private sector in the production, distribution and sale of food, States should facilitate a regulated and~~an~~ inclusive dialogue with the private sector, with particular care to smallholders, cooperatives, and the most vulnerable communities, to build strategies that improve food environments and that foster the environmental sustainability and inclusiveness of the food systems, while avoiding ceding undue power in decision-making processes, in the face their influence, and without relinquishing their regulatory role in order to protect the right to adequate food.
- ~~c)~~ States and inter-governmental organizations should ~~encourage~~ promote increased financial investment ~~to that are people-centered to~~ support sustainable food systems that deliver ~~sustainable and~~ healthy diets and enhance improved nutrition, by putting in place an enabling legal framework.
- ~~e)~~ FAO Biodiversity Mainstreaming Platform²² should be used as a neutral forum for multi-stakeholders policy, regulatory dialogue and institutional framework to foster responsible investment in agriculture and facilitate the sharing of information between stakeholders and food systems by policy-makers in ways that acknowledge the value of indigenous knowledge and for all stakeholders, and by strengthening capacities of organizations and individuals concerning the role of biodiversity for food diversity.

3.1.2 Promoting policy coherence by integrating nutrition into national development

- a) States should align policies that affect nutrition across sectors, ministries and agencies, and strengthen legal frameworks and institutional capacities to deal with the multiple causes and consequences of malnutrition. This can be done by establishing or strengthening multi-sectoral, multistakeholder mechanisms that oversee the implementation of intercultural, participatory and monitoring of evidence-based policies, strategies and interventions.
- b) States should integrate sustainable food system approaches that promote nutrition in national development, agriculture, health, economic, and disaster risk reduction plans. This should be complemented with increased budgetary allocations to food system activities that relate to improving diets and nutrition, and transparent indicators to track and assess the full cost of addressing malnutrition in all its forms.
- c) States should foster policy coherence across sectors to reduce all forms of malnutrition. These sectors include land tenure and access to natural resources planning, agriculture, fisheries, forestry, wildlife management, environment, energy, water, sanitation, hygiene, health, education, fiscal policies, industry,

²² For references, see the FAO Biodiversity Mainstreaming Platform brochure.
<http://www.fao.org/3/CA2403EN/ca2403en.pdf>

trade, investment, migration and economic and social development, including gender equality.

d) States, UN agencies, and international organizations should identify opportunities to achieve national and global food and nutrition targets set out by the WHA and the SDGs.

e) States should engage with domestic and international food companies, in collaboration with institutions responsible for health and education of consumers, to support the transition of agri-food enterprises to adopt business models that respond to healthier food systems.

f) States should engage with institutions to promote training in areas such as food science, packaging, processing to ensure a flow of human capital and skills to the food industry that responds to consumers' demand for healthier diets.

3.1.3 Instituting accountability mechanisms, monitoring and evaluation

a) States should institute and promote access to inclusive, strong and transparent processes, decision-making, mediation, grievance, dispute resolution and accountability mechanisms that pertain-are accessible to different food system actors. These mechanisms should promote good governance, public deliberation, independent bodies monitoring compliance and performance, remedial actions to improve accountability, and capacity to manage conflicts of interest and settle disputes that may undermine public health, socio-economic conditions and planetary health.

b) States should ensure that multilateral and bilateral trade and investment agreements are consistent with their obligations under international instruments relevant to the progressive realization of the right to adequate food in the context of national food security and with nutrition, food and agriculture national policies, including appropriate safeguards when necessary. Multilateral and bilateral trade and investment agreements should ~~and~~ favour the transition towards more sustainable food systems, assessing how the health, environmental, social and economic outcomes of food systems are likely to be affected. This should follow the framework provided by the CFS Principles for Responsible Investment in Agriculture and Food Systems and multilateral and bilateral trade and investment agreements. This should include an assessment of how competition will be impacted, and whether and how levels of concentrated market power will change.

c) States should improve the availability and quality of multi-sectoral information systems that capture and harmonize food security and dietary indicators (particularly the dietary intake/consumption of food ~~for the nutritionally vulnerable~~), food composition, and nutrition--related data, together with data on the three dimensions of sustainability related to food systems, for improved policy development and accountability. States should ensure there is robust technical capacity to analyze food system information, including the trade-offs and synergies between different elements of the system, in a comprehensive manner to support the planning and monitoring of actions.

<p>3.2. General comments</p>	<ul style="list-style-type: none"> As section 3.2 of the Guidelines focuses on integrated approach for sustainable agriculture, please provide a link to the FAO document Transforming food and agriculture to achieve the SDGs: 20 interconnected actions to guide decision-makers (FAO, 2018). Available online at: http://www.fao.org/3/i9900EN/i9900en.pdf <p>With regards to “Climate change and other environmental...”:</p> <ul style="list-style-type: none"> It would be interesting to go a bit beyond. We have data on the impacts at the production stage (impacts on yields, concentration of nutrients, etc.); we also have info on the impacts on consumption patterns and dietary choices. There is also available data on the impact of near-term climate-related events on child malnutrition. But the pathways/ stages in between are not well understood... What does it mean for the processing of agriculture products? Ex Traditional food processing such as drying of fish is being affected by increasingly wet conditions in the Arctic, threatening the livelihood conditions of indigenous communities. What does it mean for storage systems (foodborne pathogens and mycotoxins are expected to increase)? Food supply shortfalls would lead to major increases in food prices, while increased climate variability would accentuate price volatility. How about infrastructure disruptions?
<p>3.2. heading Suggested edits</p>	<p>SUSTAINABLE NUTRITION-ORIENTED FOOD <u>PRODUCTION AND SUPPLY CHAINS</u> IN THE CONTEXT OF CLIMATE CHANGE</p>
<p>3.2.1. General comments</p>	<ul style="list-style-type: none"> Use of sustainable management of national resources, as well as other sub-sections of Section 3, have already been mentioned in the Right to Food Guidelines and VGGT and should be drawn upon and expanded. Should there not be a paragraph about sustainable farming practices, more generally, the regulatory framework to support inter cropping, integrated pest management and distinctive chemical-intensive mono cropping? <p>With reference to initial b) – now c):</p> <ul style="list-style-type: none"> This paragraph reads as if only farmers and communities are going to be regulated, while there are many other actors that impact water resources. I think it is a drafting problem rather than intentional. The management of water should also apply to processing, storage and distribution. Reduction of water wastage also applies to cold chain technologies, processing units, etc. And a stronger coherence of policies is needed affecting water use. For instance energy subsidies contribute to overpumping water from aquifers to be used in agriculture. <p>With reference to initial c) – now d):</p> <ul style="list-style-type: none"> They should also create incentives for offering alternative source of livelihoods, facilitated by social protection interventions, in order to reduce the pressure on limited natural resources in specific sectors. Access to social protection (unemployment benefit) during the closing season for small scale fishers has been proven to be an excellent incentive for improving natural resource management, and guarantee food security of small scale fishers. <p>With reference to initial c) – now d) “conserved and sustainably used”:</p>

	<ul style="list-style-type: none"> • It would be useful to say how States should foster this protection and what the role of private sector and other actors should be. • This point seems to be contradictory to other proposed actions/principles. How does a transition towards sustainable food systems go together with the protection/conservation of current production systems? <p>With reference to initial c) – now d) “encourage the adoption of practices”:</p> <ul style="list-style-type: none"> • It is important to consider "preservation" as sometimes these practices are present from generations but could be lost; "traditional "also important together with "agroecological" as to encompass possible other interesting practices <p>With reference to initial d) – now f) “protect”:</p> <ul style="list-style-type: none"> • It seems that if those forests/fisheries are already over-exploited, the states/private actors should not only protect their biodiversity but also take actions to restore it. • Enforcement of legislation to combat IUU fishing and illegal logging should be given high priority. <p>With reference to initial d) – now f):</p> <ul style="list-style-type: none"> • International agreements are legally binding, which the VGGT are not. <p>With reference to initial e) – now g) “underutilized”:</p> <ul style="list-style-type: none"> • Depends on the reason for underutilization. They could be underutilized because they produce lower yields at the same or higher inputs and thus would be less sustainable. A careful assessment would be needed before implementing policies that could lead to unintended outcomes. <p>With reference to initial f) – now h):</p> <ul style="list-style-type: none"> • This paragraph addresses two different subjects (tenure and access to food/nutrition). Please consider splitting in two paragraphs • It could stand to be mentioned that access to land and other natural resources are critical issues for the poorest and most food insecure populations in general, and that states could promote investments and strategies that are sensitive to these populations/producers. This includes land tenure and access, but also water resource access, access to investments/financial inclusion. • Suggest to include: Free, Prior and Informed Consent (FPIC) as a specific right that pertains to indigenous peoples and is recognized in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). It allows them to give or withhold consent to initiatives that may affect them or their territories. <p>With reference to initial f) – now h) “maintained”:</p> <ul style="list-style-type: none"> • Suggest protected instead, as they should have the right to also develop different type of livelihood if wanted
<p>3.2.2. General comments</p>	<ul style="list-style-type: none"> • Livelihoods of farmers, fishers, forest dependent communities and herders should have an access to social protection, as it can help them to avoid their use of negative coping mechanisms, in case of shocks. Protecting them means also preserving their food production. • Some thought needs to be given to how the state should do this promoting, including the role of legislation, incentives and disincentives, education and information.

	<ul style="list-style-type: none"> • Missing reference to actions that promote the availability and consumption of minimally-processed and non-processed foods. • One aspect that is missing from section 3.2.2 is “Support movements, coalitions and networks” (HLPE report, part 6.3.4, p. 117). This is also strongly emphasized in the Lancet Syndemic article, which even pointed to the need to FINANCE these groups. <p>With reference to a):</p> <ul style="list-style-type: none"> • The importance and originality of this guidance is to consider nutrition into the more comprehensive approach of sustainable food system to address many interconnected issues and big challenges. • Useful might be: <i>“Transforming food and agriculture to achieve the SDGs: 20 interconnected actions to guide decision-makers</i> (FAO, 2018). Available online at: http://www.fao.org/3/I9900EN/i9900en.pdf <p>With reference to b):</p> <ul style="list-style-type: none"> • This trio “states, private sector and development partners”, repeated several times below (although not everywhere), appears to exclude civil society. It seems disingenuous to consider that “Private sector food actors” include such disparate groups as smallholder producers and multi-national agrofood companies. Maybe a footnote is warranted to define this term explicitly? • The issue of revising subsidies and taxing bad practices is a key one that we should bring in if we can. • Not necessarily all of this mentioned can be accomplished at the same time. Who would decide how and which trade-offs are to be made? What if smallholder production turned out not to be sustainable at all? Should smallholder production still be supported and incentivized? Or should focus be on supporting the transition of smallholders out of the sector to ensure more environmentally, socially and economically sustainable production and better livelihoods for the smallholders themselves? All in one could only be achieved through investment into technological development and human capital. This should be mentioned as one of the key points to achieve sustainable food security and improve nutrition. • Why only developing (low income, is the preferred term) countries? • And why only smallholders? This seems to miss out the need to “incentivize” as well other producers, processors, etc. worldwide to adopt sustainable practices (unless it is assuming that only smallholders do not adopt them?). If the point is on an extra support, it has to be more explicit, and in any case an additional para should added for the rest of producers who indeed also need incentives for transitioning to sustainable practices (although might be different incentives, of course) • Many small-scale farmers are already implementing sustainable practices many times without state support. <p>With reference to c):</p> <ul style="list-style-type: none"> • Why is the word “small” used in small animal and fishery systems? • Maybe useful to provide a note about what is actually the "small animals" category and their recognized benefits for sustainability compared to other? Sustainable livestock maybe very general. Animals (generally big) from pastoralism are key for agroecological systems, contrary to intensive production (big of small animals) with no link to land/pasture.
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	<p>With reference to d):</p> <ul style="list-style-type: none"> • In order to introduce and adopt innovative technologies and practices, it is essential that states and the private sector address the labour constraints of smallholders through the introduction of technologies that are not only labour-saving but also women-friendly. • Farmers and other food producers are already often “private sector food actors”, so what is meant here? • Perhaps the most important incentive is access to good markets. • The sentence on “on-farm conventional breeding” is not clear. What does the “through on-farm conventional breeding” refer to and is this qualifier needed? What are examples for new technologies? Perhaps, there is no need to restrict to conventional breeding. The world is innovating on a daily basis. New technologies would be available for consideration <p>With reference to d) “modern”:</p> <ul style="list-style-type: none"> • Traditional technologies can also be sustainable and efficient together, there is no justification to focus only on modern. <p>With reference to d) “access to seeds...”:</p> <ul style="list-style-type: none"> • Something that could be critical is access to financing to allow for productive investments. Designing social protection services and labour laws that ensure farmers can be resilient and manage risk could lead to adopted technologies, innovation, etc. It could be relevant to mention that ownership over the produce is important, particularly with increased use of GMO seeds. It could be worth discussing the issue of different types of produce and their value/market access: we could propose to support biodiversity through encouraging the use of heirloom and other varieties. <p>With reference to e):</p> <ul style="list-style-type: none"> • Is agricultural production in urban areas really sustainable? Can agricultural production in typically highly polluted urban areas and under questionable hygienic conditions really contribute to healthy diets? Would not a growing urban population rather depend on specialized and reliably and professionally managed agricultural production? <p>With reference to f):</p> <ul style="list-style-type: none"> • The point is unclear. What is meant by commercial development and what would be the role of the state in it? Why the qualifier about conventional on farm breeding? What does the sustainability for smallholders refer to? If the state invested into research and innovation for commercial development, how would that go together with on-farm breeding? • Previous paragraphs do not differentiate between state, private sector etc. but here all of a sudden it is only states that should invest. Surely the private sector should also be investing in this? <p>With reference to f) “commercial”:</p> <ul style="list-style-type: none"> • Why only commercial? if public funded research and innovation, this can benefit people outside the commercial sector.
<p>3.2.3. General comments</p>	<ul style="list-style-type: none"> • A crucial recommendation is about flexibility in food safety for small-scale producers (including for example home made products etc.) and traditional methods : see for example EU regulation, which considers the particularities of small scale production and specific methods inherited (compared to industrial systems) while ensuring the safety of the process - these regulation are necessary

	<p>to allow small holders and traditional producers to market nutritious and diversified food (while contributing to better livelihood etc.)</p> <ul style="list-style-type: none"> • Suggest the introduction of engaging with the private sector as most of the recommendations targets states working with the private sector. • This section includes a lot of repetition and is overly simplified, especially when it comes to the role of the state in it. States can provide an enabling environment for many of these changes, but over-regulation is very unlikely to result in better food system outcomes. How can countries be supported to find the most promising interventions for their specific situation? • Suggest to separate recommendations for producers from recommendations from processors. Sometimes farmers organizations do both, but for the most part they are separate entities in the supply chain. • Suggest differentiating between on-farm and off-farm activities in recommendations. • Missing reference to actions that promote the availability and consumption of minimally-processed and unprocessed foods. • Concerning who should do what. This is not clear. Sometimes it is both states and private sector, sometimes it is only one of them, sometimes it should include other stakeholders (e.g. civil society), but without a clear logic behind it. This should be clarified and/or modified throughout. <p>With reference to a):</p> <ul style="list-style-type: none"> • All storage requires investment. • What is meant with adequate prices? Affordable? • Why only smallholders, farmers. What about fisherfolk, pastoralists? • “supply chain investments”: Public goods? the roads and transportation are not exclusive for supporting supply chains ‘needs but many others. • It could be highlighted the importance of local markets for fresh food and direct contact with agriculture and food production (food education). <p>With reference to a) “invest in transportation...”:</p> <ul style="list-style-type: none"> • Investments means that access to finance is improved. It would be good to add something about that, while social protection can improve savings and can be used as a guarantee in case of lack of collateral. <p>With reference to c):</p> <ul style="list-style-type: none"> • They should also enact law banning and provide disincentives, to the use of unsustainable packaging. They should work towards banning all unnecessary single use plastic s in food storage. <p>With reference to c) “nanotechnology”:</p> <ul style="list-style-type: none"> • Is there evidence about sustainability and safety of nanotechnology? More generally for this recommendation, looking both at sustainability and healthy diet, the incentives should not be so much on long conservation methods and energy-dense processed foods but rather fresh (e.g. just harvested) and seasonal, short circuits etc. Such recommendation is missing. <p>With reference to d):</p> <ul style="list-style-type: none"> • There may be repetition with the proposed c) inserted; but investing in research is different from establishing guidance.
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	<ul style="list-style-type: none"> • Fortification is not a solution to all inadequate food as highly conducive to NCDs. This policy area for instance would require adequate regulatory frameworks. • And minimize the use of harmful chemicals, antibiotics, and other practices that may have negative impacts on peoples’ health (at the cost of profits increasing). <p>With reference to d) “guidelines”:</p> <ul style="list-style-type: none"> • Guidelines is way too weak, should be accompanied by binding legislation. <p>With reference to d) “breeding...oils”:</p> <ul style="list-style-type: none"> • Suggest editorial change <p>With reference to e):</p> <ul style="list-style-type: none"> • Food-based dietary guidelines are guidelines on healthy “diets”, not on particular foods. Thus, FBDGs do not include a list of “healthy” and “unhealthy” products. While, in certain occasions they may single out a product (for example “decreased consumption of sugary beverages); they cannot be used as a standard for single products for the food industry, for warning labels, etc. They should be used in combination with other governmental nutritional standards. In some cases, specific standards may need to be developed. • Not all countries have FBDGs; actually most African countries do not have FBDGs; nevertheless, this should not be an impediment for a country to call for the reformulation of certain food products of beverages (e.g. to eliminate trans fats from the food system, to decrease sodium content). <p>With reference to f):</p> <ul style="list-style-type: none"> • This point will not work. Various private sector actors are interested only in their income growth and minimizing of production costs. They don't care about decreasing of sugar or trans fats in food produced by them, if such approach doesn't make a profit. States should regulate the reformulation of food to ensure less nutritious ingredients (sugar, trans fats, etc) and increasing of health promoting ingredients by financial, tax means (excises, income taxes, etc).
<p>3.2.4. General comments</p>	<ul style="list-style-type: none"> • In a systems approach, it is not just the stakeholders that have a role in improving the market's functioning for nutrition at the end of the market transaction in terms of cost of food. It should also be their role to ensure decent pay in order to access these diets. Governments (in the case of Europe and developed countries) seek policies that redress the inequalities that lead to food banks, and moreover ensure that healthy diets are a part of education. Low-income countries can improve market infrastructure, but they can also ensure that financial markets include the poorest. The private sector should likewise recognize the importance of promoting these diets, and should be responsible where their market directly contributes to obesity (either by participating in schemes to rate their products or the French strategy to encourage consumption of nutritious foods when advertising foods that are considered “unhealthy”). • States should also recognize that individuals also need more than market access through infrastructure: productive assets and a functioning financial system also should be present. • Public procurement can be an important point to add here, considering that it can work towards the well-being of producers as well as citizens through (home grown) school feedings and other forms of procurement using public procurement schemes as a champion practice for this would help providing a first concrete step.

	<p>With reference to a):</p> <ul style="list-style-type: none"> • What is meant with nutritious commodities? Perishable products in developing countries, especially fruits and vegetables, are usually traded only locally and supply and prices are highly volatile due to seasonal and small-scale production. <p>With reference to c):</p> <ul style="list-style-type: none"> • Sustainability standards is a broader concept than quality standards and consider quality as central attribute. • Promote also direct marketing to increase consumer education, provide fresher products and better prices for producers.
3.2.5.	<ul style="list-style-type: none"> • We should use the opportunity to say that states should encourage the collective action of farm and food systems workers to protect and promote their rights and to access productive assets as well as education. It could be included under subsection a., at least as a policy option for improving their nutrition and health (because it is directly related to their decent wages, accessing services). • Formulated this section in this way it could be understood that broader markets provide higher benefits, which is wrong (higher cost); achieving food safety is primarily for protecting consumer health, even local, and a key recommendation to add, as mentioned before, is to consider flexibility in the food safety regulation enforcement to allow small-scale and traditional producers to comply with national regulations while ensuring food safety on (local) market • In the old version, there was another subsection about the policy incentives. I don't think this should be deleted. The bullet point on the need to eliminate distortive subsidies and to encourage crop diversification, as well as the one on safety nets were important. The part on incitation mechanisms was also in line with FAO Strategy on Biodiversity Mainstreaming across Agricultural Sectors (Goal 3). • National laws should be enacted and enforced to ensure compliance with relevant international labour standards. • Livelihoods of farmers, fishers, forest dependent communities and herders should have an access to social protection, as it can help them to avoid their use of negative coping mechanisms, in case of shocks. Protecting them means also preserving their food production.
3.2.6. General comments	<ul style="list-style-type: none"> • This should be mainstreamed within 3.2.1, 3.2.2 and 3.2.3. It does not make sense to have it separate and stand-alone (against systems approach). • We are missing a recommendation on fostering shorter supply chains, local producers and markets, and consider the carbon footprint of unnecessary international trade in food. • The frame of the Paris Agreement/ NDC implementation imperative should be integrated here as momentum for countries' engagement in a transformative change towards more resilient and more sustainable food systems to ensure food security and good nutrition. <p>With reference to a):</p> <ul style="list-style-type: none"> • Possibly to include Climate Smart Agriculture as a guiding principle or to consider adding that: States should consider adopting a Climate Smart Agriculture Approach. CSA is "agriculture that sustainably increases productivity, enhances

resilience (adaptation), reduces/removes GHGs (mitigation) where possible, and enhances achievement of national food security and development goals”. If a state has not already done so it should consider the guidance contained in The International Code of Conduct on Pesticide management (ICCPM) as well as the Codex Alimentarius standards for maximum residue limits and the Globally Harmonized System of Classification and Labelling of Chemicals. Governments should introduce the necessary legislation to regulate pesticides, and make provisions for effective enforcement of such legislation, taking into account local conditions. If a state has not done so it should consider the guidance contained in The International Code of Conduct for the Use and Management of Fertilizers. If a state has not already done so it should consider the guidance contained in The Voluntary Guidelines on Sustainable Soil Management (VGSSM) that provide guidance on technical and policy recommendations on sustainable soil management (SSM). Where these do not exist Governments should consider the enactment of laws and regulations which are key to enable appropriate planning for climate change adaptation and mitigation, as well as the effective creation and targeting of resources and funds for “climate-smart pest management”. The laws and regulations could govern the registration and control of agro-inputs and the monitoring of their quality once on the market.

With reference to a) “crop yields”:

- A similar para is needed for animal production, improve productivity, reduce veterinary medication and imported feeds and ensure appropriate animal welfare.

With reference to a) “assist farmers and other food producers”:

- A bit vague. Maybe recommendations for each actor at each step of the chain in relation to CC would be more useful, as actions are necessary at each steps? See examples below, although this ‘win-win approach should’ be nuanced and I would argue that we need more research on tradeoffs. Ex. At production level: Integrated production systems can facilitate both dietary diversity and climate change mitigation and adaptation. For instance, leguminous crops fix nitrogen in the soil, reducing the need for synthetic fertilizers, while they also offer good quantities of protein and B vitamin as well as carbohydrates. As livestock feed, leguminous fodder crops can also increase the feed conversion ratio, improve digestibility and decrease methane emissions from ruminants. Ex. For food handling, storage and processing : Refrigeration and cold chain systems dependent on constant electricity access along the entire food chain will be of paramount importance in order to maintain both the safety and quality of foods, as well as reduce the rate at which certain foods spoil or become contaminated by aflatoxins. A simultaneous reduction in quantitative and qualitative losses will help ease food loss and waste emissions, while ensuring higher nutritional quality for consumption. However, cold chains also emit GHGe, which may be reduced by energy efficient technologies and renewable sources. Ex, For food trade and marketing: Domestic trade, rural-urban linkages, short food supply chains where feasible, and city-region food systems are examples of ways to simultaneously increase access to fresh foods for consumers and to remunerative markets for producers thereby protecting nutritional value and reducing emissions through

	<p>better connections. Climate-proofed infrastructure and transportation will also be key to ensure smallholder's access to markets. <u>Ex For consumer demand, food preparation and preferences:</u> Social protection services are key to protect the most vulnerable from climate change impacts. At the same time, energy-efficient methods of food preparation are essential. Evidence also shows that shifts in dietary patterns can potentially provide both environment and health benefits.</p> <ul style="list-style-type: none"> • <u>CROSS-CUTTING ISSUES:</u> Empowerment of women and gender issues, Prevention and reduction of food loss and waste, Food quality, health security, and hygiene <p>With reference to b):</p> <ul style="list-style-type: none"> • Possibly another aspects to this is the need to build trust build and work more cooperatively and collaboratively with Development Partners and NGO's i.e. a participatory approach in adaptation planning, access to information for adaptation etc. Often it boils down to a governance issue and some additional roles NGO's and development partners can play include assisting states develop their capacity to effectively integrate food security and nutrition considerations into their laws and policies with participation of farmers and food producers. Development partners and NGO's can also provide advice to states and build their capacity in order to assist states access international climate finance and ensure food systems concerns are sufficiently integrated and to engage with global climate change initiatives. • Insurance is a private sector function and not something that donors and NGO's provide. • To support institutions in improved implementation of laws and regulations that foster sustainable food systems is needed. • NGO's can also play a critical role in improving Governments and other stakeholders understanding of adaptation and mitigation benefits. • NGO's can also play an advocacy role in advocating for climate smart agriculture approaches and for a bioeconomy approach. • NGO's and development partners can play a role in building the capacity of states to collect data and make evidence based decisions. <p>With reference to b) "productive asset creation":</p> <ul style="list-style-type: none"> • And social protection to support small farmers in switching to these practices is needed. <p>With reference to c):</p> <ul style="list-style-type: none"> • If a state has not already done so it should consider adopting (?) the standards developed by the World Organisation for animal health (OIE) that sets standards relating to animal health and zoonoses. The OIE publishes standard setting documents which have become the principle reference for WTO members, including: the Terrestrial Animal Health Code and Aquatic Animal Health Code respectively aim to assure the sanitary safety of international trade in terrestrial animals and aquatic animals, and their products. • In terms of mitigation measures in the livestock sector some of the ones that have been promoted by FAO include the use of better quality feed and feed balancing to lower enteric and manure emissions; improvement of breeding and animal health to reduce herd overheads and related emissions; manure
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	<p>management practices that ensure the recovery and recycling of nutrients and energy contained in manure; improvements in energy use efficiency along supply chains; sourcing low emission intensity inputs (feed and energy in particular); grassland carbon sequestration etc.</p> <ul style="list-style-type: none"> • Where these do not exist states should adopt laws or regulations that assign mitigation targets for farmers/sectors, as well as consider the use of more prescriptive approaches i.e. mandating the use of specific mitigation technologies and practices. • Where these do not exist states should consider the enactment of laws on Animal health that could integrate regulatory issues such as the maximum concentration of animals in a given space, requirements for animal housing, which could include sequestration of enteric fermentation emissions, also requirements on feed materials and practices. • States could consider the use of market based instruments (for example labelling schemes), including to increase the flow of information about for example the emissions associated with different livestock commodities which can help consumers and producers to better align their consumption and production preferences with the emission profiles of these commodities. <p>With reference to c) “livestock”:</p> <ul style="list-style-type: none"> • How about aquaculture? Change livestock to animals and fish is included. <p>With reference to d) “diversify agricultural investment based on ecological suitability”:</p> <ul style="list-style-type: none"> • It is not clear sentence. May be some more elaboration will be of help. <p>With reference to d) “should include dietary quality indices”:</p> <ul style="list-style-type: none"> • This is a very important (general) point. However, it seems to be ill-placed in this subsection on climate adaptation and mitigation. This should apply to all policy responses to address malnutrition. <p>With reference to f):</p> <ul style="list-style-type: none"> • Filling the ‘missing middle’ knowledge gap would be important.
<p>3.2.7. General comments</p>	<ul style="list-style-type: none"> • Suggest that recommendations are also made for elderly farmers in agriculture who are often more vulnerable than young people. • We suggest adding a dedicated point on job creation (see below c))as well as on child labour and under-age youth (see below e).
<p>3.2.8. General comments</p>	<ul style="list-style-type: none"> • It would be important to consider a recommendations for governments to consider, when it is the case, for small-scale production and traditional system production specific rules (regulations, guidelines, etc.) that are appropriate to specific local conditions, ensuring the safety of the product while allowing small-scale or traditional producers to comply with. <p>With reference to a) “handling”:</p> <ul style="list-style-type: none"> • Would it also include production (pesticides and antibiotics, etc.). <p>With reference to d):</p> <ul style="list-style-type: none"> • The regulation of veterinary drugs to stem against non-therapeutic uses could be explicitly mentioned. • Alternative bullet point: “Sound legal frameworks in the areas relevant for AMR promote the appropriate use of antimicrobials and eliminate their misuse and overuse, including reducing the non-therapeutic use of antimicrobials and

	<p>phasing out the use of antimicrobials as growth promoters in the absence of risk analysis as described in the Codex Code of Practice CAC/RCP-2005. Further, comprehensive frameworks contribute towards minimizing the contamination of food and the environment with antimicrobial residues and resistant microorganisms, and promote better animal and environmental health to reduce the need to use antimicrobials.”</p> <p>With reference to d) “prudent use”:</p> <ul style="list-style-type: none"> • This appears to be narrowly focused on guidelines on the prudent use of antimicrobials in food producing animals. Beyond the term “prudent use”, national frameworks need to be sufficient to cover also the issue of contaminant/residue of AMs in food (the main food safety specific issue). As the focus of the section is on food safety, the focus of the point on AMR should be to “..develop and implement the appropriate national legal frameworks that contribute towards preventing the development and spread of AMR, based on the relevant international reference standards and good practices. <p>With reference to d) “non-therapeutic use of antimicrobials”:</p> <ul style="list-style-type: none"> • This indicates the purpose of such measures is to reduce the non-therapeutic use of antimicrobials and to phase out the use of antimicrobials as growth promoters in the absence of risk analysis – while these are two important goals, it is perhaps too narrow to encompass the need to eliminate misuse and overuse, to promote the appropriate use of antimicrobials, and to minimize the contamination of food and the environment with AM residues and resistant microorganisms.
<p>Paragraph 39 Suggested edits</p>	<p>Food <u>supply</u> chains operate at assorted scales and levels, from the shortest supply chains, to long, highly complex and globalized chains, <u>making use of the limited natural resources to produce, process, distribute and consume food</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 healthy diet. Climate change and other environmental constraints are also making food supply more challenging. An adequate governance for food supply chains is crucial in the context of environmental degradation and climate change, as the food systems must ensure the sustainable use and preservation of natural resources and biodiversity.</p> <p>3.2.1 Ensuring sustainable use and management of natural resources</p> <p>a) <u>States should promote an ecosystem approach for the integrated and adaptive management of terrestrial, freshwater, marine and living resources that promotes conservation and sustainable use in an equitable way. Natural resources, biodiversity and ecosystem services play a key role in ensuring food diversity and security, and good nutrition for all. It is therefore crucial that the governance of food systems and food supply chains guarantees the sustainable use and management of natural resources as well as the preservation of biodiversity.</u></p> <p>a)b) States, farmers and other food producers should ensure that soil fertility is addressed as central to agriculture production systems, because <u>healthy</u> nutrient-rich soils are critical to the <u>sustainable</u> production of food necessary for <u>sustainable</u> healthy diets. States should encourage the use of ecosystem services, which maintain soil biodiversity and nutrient balance, and promote carbon</p>

	<p>storage, <u>and take appropriate regulatory measures to prevent loss of soil fertility and soil pollution.</u></p> <p>b)c) States should ensure the management, control and sustainable use of water resources for agriculture and food production through regulation and community participatory approaches. These approaches should <u>ensure the equitable, reliable and sustained access to, and use and control of water,</u> 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 <u>other</u> food producers to grow sufficient, <u>safe and</u> nutritious food.</p> <p>d) States should foster the protection of <u>areas with high biodiversity value, endangered species,</u> biodiverse landscapes and food and agriculture production systems including crops, livestock, forestry and plantations, fisheries and sustainable aquaculture. <u>Through the promotion of Green Jobs, they</u>They should encourage the adoption of practices, including agroecological approaches, that ensure that the biodiversity of landscapes, including forests, waters and coastal seas, other agro-ecosystems, and sylvo-pastoral systems, is conserved and sustainably used.</p> <p>e)e) <u>In line with FAO Strategy on Biodiversity Mainstreaming²³, States should ensure that the agricultural production systems make all necessary efforts to limit their negative impact on biodiversity; especially knowing that those same food production systems rely heavily on a wide range of ecosystem services derived from the biodiversity present in landscapes and seascapes.</u></p> <p>e)f) <u>In line with FAO Strategy on Biodiversity Mainstreaming²⁴, States and private-sector food actors should protect ensure the sustainable use, the conservation and the restoration of</u> the biodiversity of forests and fisheries that are currently over-sourced, over-exploited, and endangered, by implementing the <u>VGGT, the CFS-RAI, VGGT</u> and other relevant international agreements.</p> <p>e)g) States should promote the diversification of crops and animals including neglected and underutilized traditional crops <u>and local breeds,</u> fruits, vegetables, legumes, nuts, and seeds, and animal-source food, applying sustainable food production and natural resource management practices.</p> <p>h) States should protect the rights <u>over land and territories</u> of indigenous peoples and other communities with customary tenure systems²⁵ that exercise self-governance of land, fisheries and forests, to land, territories and resources they have traditionally owned, occupied or otherwise used or acquired. <u>This should be</u></p>
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²³ For references, see Goal 1 of FAO Strategy for Biodiversity Mainstreaming across Agricultural Sectors. <http://www.fao.org/3/nb349en/nb349en.pdf>

²⁴ For references, see Goal 2 of FAO Strategy for Biodiversity Mainstreaming across Agricultural Sectors. <http://www.fao.org/3/nb349en/nb349en.pdf>

²⁵ Refer to the Chapter 9 on Indigenous peoples and other communities with customary tenure systems of the CFS Voluntary Guidelines on the responsible governance of tenure of land, fisheries and forests in the context of national food security – VGGT (2012).

done in application of the VGGT and other relevant international agreements.

They should be provided with equitable and sustainable rights to those resources, their livelihoods should be maintained, their indigenous knowledge and practices should be valued and protected, their access to traditional and wild foods and edible insects should be protected, and their diets, nutrition and wellbeing should be prioritized. States should actively engage with indigenous people by taking their concerns and resources, needs into account at all stages of policy-making, for example by implementing mechanisms to facilitate the involvement of indigenous people in particular neglected and underutilized traditional seeds and planting material should be guaranteed decision-making processes.

f)i) States should promote efficiencies of food systems encouraging any action towards the reduction of post-harvest and quality losses as well as food waste, in order to support sustainable use and management of natural resources especially for fruits and vegetables.

3.2.2 Promoting nutrition within agriculture and food production

- a) States should promote sustainable nutrition-sensitive agriculture and diversified integrated food production through the integration of nutrition objectives and biodiversity mainstreaming into national food and agriculture policies and the establishment of incentives schemes accordingly.
- b) States, private sector food actors and development partners should support and incentivize smallholders producers, (including women and youth), particularly within developing countries, to adopt maintain and adopt sustainable production practices and to produce diverse crops integrated with trees, livestock and/or fish or adopt alternative source of income that will contribute to the availability, affordability and accessibility of safe and nutritious food, while enhancing farmers' income and livelihood, including by supporting and conserving local genetic resources and safeguarding the health of the planet.
- c) States, private sector food actors and development partners should support sustainable livestock, small animal and fishery systems (including artisanal fish and other aquatic systems) and other traditional food systems because they contribute to the protection and development of livelihoods, provide income, and supply key nutrients for health and wellbeing.
- d) States and private sector food actors should ensure farmers and other food producers , with their free, prior and informed consent, have access to seeds, modern and sustainable technologies, as well as skill training and capacity development to be able to use those technologies that could improve the production and quality of crops and animals. These include, among others, biofortified crops, through on-farm conventional breeding, and sustainable agriculture technologies including better management of pollination, water and nutrient cycling, as well as new technologies.
- e) States should integrate urban and peri-urban agriculture and urban land use into national and local agricultural development strategies, food and nutrition

programmes, and urban planning, as a viable input into healthy diets for growing urban populations and social cohesion of communities.

- f) States should invest in research and innovation for ~~commercial~~ development of nutritious crops, such as fruit, vegetables, healthy oils, nuts and seeds, legumes, biofortified crops, and diverse animal-sourced food, which are developed through conventional ~~on~~ farm breeding and are sustainable for smallholders and in respect of the rights and intellectual property of indigenous peoples over their seeds and food.
- g) States should assist farmers in investing in sustainable technologies, by assisting them with access to credit, insurance and markets that reward them for choosing nutritional and sustainable options.
- h) States should encourage the diversity of diets and reduce the risks of homogenization of traditional diets with highly-processed food.

3.2.3 Improving food storage, processing, transformation and reformulation

- a) States and private sector food actors should collaborate to identify investments to ~~foster the~~ development and foster the uptake of adapted and affordable storage facilities, ~~or invest in adequate storage~~, including cold storage, to allow for smallholders and food actors to improve food safety and have greater flexibility to when they can sell their products, and to allow consumers to buy such products at adequate prices. States should also invest in transportation and road infrastructure to ensure the production of smallholders ~~farmers~~ are able to reach markets. These supply chain investments should be complemented with improved and accessible information technology, financial opportunities, training and capacity development ~~building~~ to increase ~~farmers' producers'~~ opportunities to deliver diverse, perishable, safe and nutritious food to market and for consumers to access those markets.
- b) States and private sector food actors, including ~~farmers~~ agricultural producers and their associations, should facilitate minimizing food and nutrient loss on farms, during post-harvest storage and throughout processing and transportation, particularly of perishable foods ~~such as fruits, vegetables, dairy, and animal source foods~~. Facilitation includes training and capacity development, investment, management practices and fostering the adoption of appropriate processing technologies, such as cold chambers storage units, solar walk-ins, refrigerators and dry storage, storage ~~drums~~ and drying facilities and other climate-smart technologies aimed at preserving food quality and shelf life.
- c) States should incentivize private sector food actors to invest in innovations that work towards more sustainable and safe packaging of products such as nanotechnology, waxing, plant-based wrapping, and biodegradable plastics.
- d) States should establish guidance for the use and scale-up of processing technologies that can improve the ~~nutritional~~ nutrient content of food (fortification/biofortification), minimize nutrient post-harvest losses, and promote longer-term storage of food, particularly during periods of drought and poor production. Such technologies could include flash and solar drying,

converting food to pastes and spreads, and fortification through conventional on farming breeding of staples and oils. States should set guidelines and monitor the level of processing as highly-processed food often energy-dense foods high in fat, sugar and/or salt, have associations found to be associated- with unhealthy diets, overweight and obesity.

- e) States should institute regulatory instruments to promote reformulation, complemented with nutritional warning labels and taxes on less nutritious food products that do not adhere to national food-based dietary guidelines.
- f) ~~States and Private~~ Private sector food and beverage actors should collaborate to strive to meet public health goals by investing in the reformulation of processed reformulating food products to ensure the reduction of less nutritious ingredients – such as sugars, salt/sodium and unhealthy saturated fats – and the elimination of such as trans fats – are minimized or eliminated in food and beverage products ~~and nutritious ingredients such as fibre, fortificants, and other health promoting ingredients are increased.~~
- a) States and food processors, including their associations, should invest in research, innovations and capacity building to identify preservation, packaging and food processing techniques that retain or reduce the nutritional depletion of packaged and processed foods.

3.2.4 Making markets work for nutrition

- a) To reduce food price volatility of diverse, 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, food prices monitoring systems and future prices.
- b) 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. These investments should respect the CFS Principles for Responsible Investment in Agriculture and Food Systems (CFS-RAI).
- c) States and private sector actors should support smallholders to meet safety and quality standards of diverse, nutritious food from traditional and agroecological systems to ensure healthy diets-that enable them to fulfill demand for the local consumption whilst reaching broader markets and getting higher profits for their products. Small local food producers are custodians for local biological diversity.
- e)d) States, private sector and civil society should support short supply chains such as territorial markets and public procurement programmes where smallholder farmers and small and medium enterprises have a better access to market and are better remunerated. They should promote inclusive markets that provide opportunities to all, including small-scale farmers and most vulnerable groups, thus creating wellness, jobs and affordable goods and services.
- e)e) States should work with food market boards, food research and development bodies, and consumer associations to carry out consumer intelligence studies and

develop marketing strategies for the creation of markets for foods that contribute to healthy diets.

e)f) States should ensure that schools, hospitals and all other public spaces serve local, diverse, seasonal and nutritious food.

f)g) States should promote trade in nutritious commodities such as fruits, legumes and vegetables to facilitate a greater variety of food supplies, to help absorb domestic supply and demand shocks that could otherwise result in excess domestic food price volatility, and to support the balancing of surpluses and deficits in the availability of nutrients across countries.

g)h) States should introduce policies that address potential negative effects of greater openness to international markets on domestic farmers, producers and processors, in particular those who produce or handle nutritious products, to ensure food and nutrition security in rural and agricultural areas.

h)i) States should promote and stimulate investments by private sector actors in the production, processing and distribution of nutritious foods. These investments should respect the CFS Principles for Responsible Investment in Agriculture and Food Systems.

i) States should improve their tracking of food availability and access to food to incorporate information on food composition; the availability of nutrients; and access to and consumption of food and nutrients by different socio-economic strata, age brackets and gender.

3.2.5 Improving nutrition and health of farm and food system workers

a) States and private sector actors should ensure that those who grow the world's food, have sufficient livelihoods to ensure they too can access healthy diets for their own optimal nutritional status. This means ensuring food producers, processors, traders and transporters and other workers are food secure, have decent wages and conditions at work, have access to social protection and can access health services, with special attention to women who face specific constraints due to gender-based discrimination.

b) States should ensure that the rights to social protection and decent work ~~is~~are respected, protected and fulfilled, that farmers and other food producers and workers are protected and safe, that freedom of association and the right to collective bargaining is respected, that no child is involved in harmful work or hazardous tasks, that no forced labor practices exist, that there is no discrimination at work, and there is no unnecessary burden or undue labour (particularly for women) which could negatively impact their health and caregiving roles.

3.2.6 Prioritizing climate change adaptation and mitigation

a) States should integrate climate change considerations into agrifood systems policies, strategies and programmes and support and assist farmers and other food producers to lower the environmental impact of food systems. This could be done by reservation of traditional/agroecological methods that contribute to sustainable food systems and fostering appropriate investment, technology and

	<p>changes in management to improve crop yields <u>adaptation and resilience</u> and reduce non-organic fertilizer and pesticide usage. States could promote optimization of agricultural outputs per unit of water, energy, and land, and manage the carbon footprint of agriculture activities as well as inclusion of more agrobiodiversity in the form of intra-crop and inter-crop diverse systems. <u>States should also support and assist food producers in ensuring the sustainable use and the preservation of biodiversity as well as the conservation of the related ecosystem services in landscapes and seascapes.</u></p> <p>b) Development States, development partners and Non-Governmental Organizations (NGOs) should provide technical assistance to farmers and other food producers to help them adapt to, and ensure food supply chains are resilient to, climatic shocks and humanitarian crises. Interventions could include access to finance, insurance, better forecasting data, and productive-asset creation initiatives (e.g. rehabilitating degraded land and infrastructure building).</p> <p>c) States should assist farmers and other food producers to protect crops and livestock and their production systems from the anticipated impacts of climate change in the form of pests, diseases, weather-related shocks, extreme price volatility through cover crops, no-till farming, <u>well integrated crop-tree-livestock-fish production</u>, crop and weather insurance, and renewable energy technologies.</p> <p>d) States should support investment in diverse and nutritious crops and animal production systems, enhanced storage and marketing, reduced food loss and resilience-focused adaptations. Donors and investors should diversify agricultural investment based on ecological suitability, such that a greater diversity of production systems are supported, varied and at scale to meet the needs of both large and small farmers <u>and other food producers</u>.</p> <p>e) States should include dietary quality indices and other food system metrics including agrobiodiversity indicators and GHG emissions, as part of climate-related target-setting agendas and in related surveillance systems (including early warning systems) to monitor changing conditions and the effectiveness of policy responses.</p> <p>f) Researchers should promote the generation and use of rigorous evidence on investment along food supply chains that are resilient to climate change while also delivering positive dietary outcomes. Research should focus on potential interventions and policy entry points to ensure agricultural production, processing and packaging, retail and markets, and consumer demand are adaptable to climate change and disruption.</p> <p>g) States together with indigenous peoples representatives and their UN mechanisms, should develop climate change mitigation and adaptation strategies that are based on indigenous and traditional food systems and their ancestral knowledge, and can contribute to broadening the food base and overcoming the</p>
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homogenization of diets, while overcoming the combined challenges of climate change, food insecurity, loss of biodiversity, and land degradation.²⁶

3.2.7 Empowering youth in food systems

- a) States should engage and empower youth by enhancing their access to productive and customary owned land, natural resources, inputs, productive tools, extension, advisory service, and financial services, education, training, markets, information, and inclusion in decision-making.
- b) States and private sector food actors should provide appropriate and intercultural training, education, apprenticeship and mentorship programmes for youth as well as social protection to increase their capacity and access to decent work and entrepreneurship opportunities to stimulate their contribution to reshaping food systems.
- c) States and private sector food actors should prioritize the creation of decent jobs for youth in public work programmes, and public and private investments respectively, especially those linked to agri-food systems' development.
- d) States and private sector food actors should promote development and access to innovation and new technologies, combined with traditional knowledge, along food supply chains that enhance nutrition, especially to attract and enable youth to be drivers of improvement in food systems.
- e) States should acknowledge the significant time and work burden many children and under-age youth shoulder in rural areas because of food insecurity, which leads to undernutrition and wasting. States should respond appropriately to protect children and under-age youth, for example thanks to measures of people-centered nutrition knowledge, education and information.

3.2.8 Supporting food safety across food supply chains

- a) States should prioritize food safety within their food systems and consider actions concerning production, handling, preparation, storage, and distribution of food in ways that prevent food-borne illnesses, transmission or contamination of naturally occurring toxins, pesticides, antibiotics and heavy metals. Investments should be made to train food handlers and adopt scientific, risk-based practices that can provide safe food while retaining their nutritional value.
- b) States should develop, establish, enforce and strengthen, as appropriate, food control systems, including reviewing and modernizing national food safety legislation and regulations to ensure that food producers and suppliers throughout the food chain operate responsibly. Considering the centrality of the *Codex Alimentarius Commission* on nutrition and food safety, States should implement, as appropriate, internationally adopted standards at the national level.
- c) States should participate in, and contribute to, international networks to exchange food safety information, including the management of emergencies to

²⁶ The Intergovernmental Panel on Climate Change (IPCC) Special Report on Climate Change and Land
<https://www.ipcc.ch/srccl-report-download-page/>

	<p>improve the safety of food across a range of issues such as pesticide residues, antimicrobial residues, endocrine disrupters, chemical and unsafe food additives, pathogenic bacteria, viruses, and parasites.</p> <p>d) To address global antimicrobial resistance (AMR), States should develop and implement national guidelines on the prudent use <u>implement the appropriate national legal frameworks that contribute towards preventing the development and spread of AMR, based on the relevant international reference standards and good practices of antimicrobials in food-producing animals according to internationally recognized standards adopted by competent international organizations</u>. This is to reduce the non-therapeutic use of antimicrobials and to phase out the use of antimicrobials as growth promoters in the absence of risk analysis as described in the <i>Codex Code of Practice CAC/RCP61-2005</i>.</p>
<p>3.3. heading Suggested edits</p>	<p>EQUITABLE ACCESS TO SUSTAINABLE AND HEALTHY DIETS</p>
<p>Paragraph 40 General comments</p>	<ul style="list-style-type: none"> • Due to rising cost of nutritious foods (such as fruits and vegetables in Asia for example) and persistence of extreme poverty and increasing number of near poor, suggested some edits regards “affordable”.
<p>3.3.1. General comments</p>	<ul style="list-style-type: none"> • Bullet points should go from macro level, national level to specific groups. • It is felt that this section also addresses economic access to some extent by highlighting well access in low income areas. It is understood that Part 3.3.3 is intended to refer to economic access, but affordability of food is just one aspect of economic access (i.e. this is a mistake in the HLPE depiction of food access in the conceptual framework). Maybe the best solution is to change the sub-title of 3.3.3 to Economic access and include some paragraphs about promoting living wages, greater economic equality, and robust social safety nets. • This section is too slanted to physical access and ignores the millions that have issues of economic access. • The section in the new b) “by creating robust zoning laws that restrict food retail outlets which sell an overabundance of less nutritious food” and in the new c) “reduce the density of fast-food vendors that sell less nutritious food” overlap slightly. <p>With reference to new c) “encourage”:</p> <ul style="list-style-type: none"> • It is understood why there are zones without such nutritious foods, to be able to design the appropriate policies. If the zones are characterized by low income households that are being bombarded by messages of processed cheap food high in fat, sugar and/or salt and limited by lack of income. <p>With reference to new d) “equity lens”:</p> <ul style="list-style-type: none"> • States and international organizations should study the access of the poor and extreme poor to nutritious foods, understanding the barriers that they face (physical, financial and knowledge). This should also include the competing priorities existing in these households (consumption, basic services, debt repayment, productive investment, etc.). This analysis should also include the growing class of near-poor households that is making up a greater proportion of

	<p>the population that easily falls into poverty due to idiosyncratic and covariate (climate-related disasters) shocks.</p> <p>With reference to e):</p> <ul style="list-style-type: none"> States should enact laws to ensure that beneficiaries have secure and enforceable legal entitlements to the benefits in question and to enhance their governance. <p>With reference to e) “poor households”:</p> <ul style="list-style-type: none"> Many poor households are food producing households and require capacity development and access to information and resources.
<p>3.3.2. General comments</p>	<ul style="list-style-type: none"> This section could be combined with sub-section 3.3.1. It might be useful to highlight the role of trade in ensuring the availability of food and nutrients in this section, too. See suggested edits. It might further be useful to highlight the need for regulation of global food value chains. See added paragraph. The guidelines should send a stronger message about the need to restrict the availability of processed energy-dense foods, i.e. foods that are high in fat, sugar and/or salt, for example through the regulation of imports and production, and banning these processed foods from hospitals, and public offices. The private sector and its regulation/participation is almost completely missing from here-- ensuring that nutritious foods can be available could be promoted ensuring the infrastructure exists to store/serve these foods. Moreover they can utilize data more efficiently by partnering with private sector to ensure better understanding of the spatial distribution of healthy food consumption patterns, and understand the gaps in food delivery. Policies should be implemented, particularly in the aforementioned food swamps/deserts to work on availability of healthy foods and informing the citizens. <p>With reference to a) “local farmers’ markets”:</p> <ul style="list-style-type: none"> The emphasis on local farmers’ markets is appreciated. Unfortunately, the sanitation in local farmers’ markets in many developing countries are sub-standard. Therefore, more people are moving to supermarkets for purchase of their local foods. This is not good for local farmers. <p>With reference to c):</p> <ul style="list-style-type: none"> Institutional procurement should serve as an instrument for ensuring both purposes: nutrition and sustainable development. Inclusiveness is key. Also, there are food safety considerations.
<p>3.3.3. General comments</p>	<ul style="list-style-type: none"> As abovementioned, affordability of food is just one aspect of economic access. Maybe the best solution is to change the sub-title of 3.3.3 to Economic access and include some paragraphs about promoting living wages, greater economic equality, and robust social safety nets or social assistance. Some of the interventions mentioned below could result in severe market distortions, many of which would rather impede production. All market interventions need to be carefully assessed to avoid unintended outcomes. Another important point is to make highly-processed foods less affordable by removing agricultural subsidies of crops used to obtain some of the key ingredients used in their preparation.

	<ul style="list-style-type: none"> • This paragraph could recommend laws that mandate discounting (rather than throwing out) food that is safe but past its best or close to expiry. • Review can also be made to policies that subsidize cheap energy-dense foods high in fat, sugar and/or salt and facilitate unhealthy food environments. • One additional recommendation about support better recognition and informed choice and preference for nutrition coming from agroecological/traditional food systems through food education including taste education, and revalorization of all local food cultures against globalized energy-dense food high in fat, sugar and/or salt. <p>With reference to b) “reduce their production costs”:</p> <ul style="list-style-type: none"> • Farmers produce the primary product that is also input to all higher-processed foods. At the level of primary production, what would be nutritious and less nutritious products? Assuming fruit and vegetable production were incentivized, what would be the implications for land use/biodiversity/pesticide use/competitiveness/food loss and waste, etc.? • With reference to c) “nutritious food”: • Could perhaps add in this sentence from a and agroecological or traditional food systems. <p>With reference to d) “incentives to reduce the price of nutritious food”:</p> <ul style="list-style-type: none"> • Can we also include environment friendly packaging?
<p>3.3.4. General comments</p>	<ul style="list-style-type: none"> • Technologies could also be useful to manage stocks and limit food waste by retail and consumers. <p>With reference to a):</p> <ul style="list-style-type: none"> • Unclear what is meant with “addressing the digital divide among different demographics through the use of portable tools to minimize disparities in access to food”. <p>With reference to a):</p> <ul style="list-style-type: none"> • Perhaps mention positive apps such as those used to give away or share food before it goes to waste. <p>With reference to a) “online shopping”:</p> <ul style="list-style-type: none"> • What does this mean? Is this referring to online food delivery? <p>With reference to b):</p> <ul style="list-style-type: none"> • What about street food which accounts for a very important part of food consumption and is widely informal and unregulated in many contexts? <p>With reference to b) “restaurants”:</p> <ul style="list-style-type: none"> • Can a more general term be found that includes street vendors? e.g. restaurants and other vendors of prepared foods? <p>With reference to c) “scrutinize”:</p> <ul style="list-style-type: none"> • States can also scrutinize new trends in food consumption and designing spaces that encourage healthy diets/healthy consumption.
<p>Paragraph 40 Suggested edits</p>	<p>Policies, <u>legislation and regulatory frameworks</u>, and programmes aimed at improving food environments to ensure <u>sustainable</u> healthy diets are available, accessible, affordable, culturally acceptable<u>appropriate</u>, and safe, should be prioritized by States in the interest of their citizens. For many people, physical access to nutritious food can be problematic as it may not be available in local markets or <u>other</u> the markets. Nutritious</p>

food ~~may not~~ ~~can also~~ be unaffordable, particularly food that is perishable, ~~or comes from~~ ~~travels~~ a longer distance, ~~or for instance organic food produce.~~

3.3.1 Improving physical and economic access to nutritious food

a) States should improve the availability and access of the food supply through appropriate trade and investment agreements and policies and ensure that such agreements and policies do not have a negative impact on the realization of the right to adequate food in other countries.

b) States should ensure people’s physical barriers are minimized to produce, purchase or order diverse types of nutritious food in a given food environment. This can be done by instituting policies that encourage healthy outlets to populate “food deserts²⁷” with markets that sell affordable nutritious, ~~affordable~~ food, and stop the spread of “food swamps²⁸” by creating robust zoning laws that restrict food retail outlets which sell an overabundance of less nutritious food.

c) States should ~~encourage enact~~ zoning laws and provide tax incentives for farmers’ markets and mobile food retailers that sell diverse and nutritious food in low-income areas, and reduce the density of fast-food vendors that sell less nutritious food.

a)d) States should take into consideration an equity lens when examining access to food environments and ensure members of historically marginalized and vulnerable communities, residents of low-income communities, indigenous peoples, and those living in rural areas have sufficient access to diversified food markets.

~~b)a) States should improve the availability and access of the food supply through appropriate trade and investment agreements and policies and ensure that such agreements and policies do not have a negative impact on the realization of the right to adequate food in other countries.~~

e)e) States should facilitate access to diverse and nutritious food for poor households through national social protection programmes, such as vouchers, cash or food supplement programmes that ensure that all households have access to basic needs including nutritious foods. These programmes could substitute basic staple food (such as rice or wheat flour) with more nutritious food in the food basket provided to poor households.

3.3.2 Improving the availability of nutritious food

a) States should promote the provision of diverse and nutritious food through conducive international trade agreements as well as the provision of economic inclusion programmes, the support of local ~~farmers-producer~~ markets, community cooperatives and other community building efforts that engage citizens, indigenous peoples and other communities around local food culture.

b) States should encourage small and medium enterprises to competitively participate in wet markets, local, domestic and informal markets, and incentivize

²⁷ “Food deserts” are geographic areas where access to food is restricted or non-existent due to low density of “food entry points” within a practical travelling distance. HLPE 2017b

²⁸ The term “food swamps” describes areas where there is an overabundance of less nutritious food but little access to nutritious food. HLPE 2017b.

street vendors to improve the safety and health-nutritional composition of prepared food through financial incentives and certifications.

c) States should ensure inclusive public procurement systems for safe, nutritious and culturally appropriate food in institutions such as schools, hospitals, food banks, and prisons to achieve both nutritional outcomes and socioeconomic goals through improved access of smallholder farmers to public markets. States should consider promoting home-grown school feeding programs, where the food served in schools is procured from local and/or family farmers, creating multiple food system benefits including children’s access to fresh, diverse and healthy foods while establishing stable markets for producers. States should support the linkages between school demand for food and local smallholder production by an adequate food safety and quality control system and regulatory frameworks, which not only monitors smallholders’ compliance with food safety and quality standards but also has provisions to build their capacity to do so. States should strengthen public procurement systems by ensuring nutritious and culturally appropriate food is more accessible and convenient in institutions such as schools, hospitals, foodbanks, and prisons. States should consider promoting home-grown school meals, where food served in schools is procured from local and/or family farmers, which can have multiple food system benefits by establishing stable markets for producers while serving more recommended, healthy diets to children.

e)d) States should promote the optimization of global food value chains to facilitate positive nutrition outcomes through a higher availability of nutritious food products and a more equitable distribution of incomes along the value chain (supply and demand-side factors). To this end, they should promote responsible business conduct and due diligence in global food supply chains through supporting the application of the OECD-FAO Guidance for Responsible Agricultural Supply Chains and related instruments such as the UN Guiding Principles for Business and Human Rights, the CFS-RAI and the VGGT.

3.3.3 Making diverse nutritious food more affordable

- a) States should consider pricing policies of perishable fruits and vegetables, whole grains, legumes, nuts and seeds, and animal source food to ensure they are affordable, preferred and competitive compared with highly energy-dense processed food (which can be inexpensive but often high in added sugars, sodium, and trans-fats or unhealthy-saturated fats). This can be done through input subsidies, incentives for infrastructure upgrading for e.g. cold chain developments, incentives to agro ecological practices, access to credit, and tax.
- b) States can be instrumental in reducing the prices of nutritious food by helping farmers and other food producers reduce their production costs, including the negative impacts – externalities – stemming from biodiversity loss or damage. This can be accomplished through grants, subsidies and non-financial support services to reduce inefficiencies and promote value of nutritious food in the supply chain.

	<p>c) States and local governments, in collaboration with consumers’ associations, can institute regulations and incentives to help existing food retailers increase the number and variety of nutritious food products they sell. This can be done by creating local food policy councils to give residents a voice in how best to improve access to healthy diets in their communities.</p> <p>d) States should institute tax incentives, <u>legislation</u> and other fiscal policies to promote more nutritious food in the food industry. This can be done by creating disincentives including excise or sales taxes on less nutritious food, such as sugar sweetened beverages and less nutritious highly-processed food, or removing industry tax benefits for the development and marketing of less nutritious food. Tax revenues can also be used for health promotion strategies including retail, manufacturing, or agricultural incentives to reduce the price of nutritious food <u>and increase the variety of food being commercialized</u>.</p> <p>3.3.4 Monitoring new technologies and trends for healthy diets</p> <p>a) States and researchers should <u>understand-research and document</u> the influential roles of the internet, social media and online shopping on the access to healthy diets, addressing the digital divide among different demographics through the use of portable tools to minimize disparities in access to food.</p> <p>b) States and private sector food actors should ensure that with the emerging trend of increased consumption of food consumed away from home, restaurants are incentivized to promote nutritious food options, display information about food on menus (i.e. calories, and other nutritional content), and adhere to food safety regulations.</p> <p>c) With regard to environmental <u>dimension of</u> sustainability, States should understand, scrutinize and govern <u>new-novel</u> food technologies (e.g. lab grown meats, gene editing, biofortified crops, etc.) through CODEX standards <u>as any new food-product does in international regulatory frameworks</u>.</p>
<p>3.4. General comments</p>	<ul style="list-style-type: none"> • Here we are shifting the irresistibility away from private sector actor and on the consumer. Perhaps this could be a place also to talk about empowerment of consumers to demand better service from the private sector and to influence regulations.
<p>Paragraph 41 General comments</p>	<ul style="list-style-type: none"> • The heading reads somewhat unusual, as it does not come out clearly what is to be people centered: food systems, nutrition, or the processes of knowledge generation and education. At a first glance it reads as if education was currently not targeted to people. It is probably not meant like this. • Private sector actors, from producers to retailers are actually at the centre of the food system, although the health and nutrition of people should be at the centre of efforts by duty bearers and third parties. • This section needs heavy revision, as it is mixing concepts, target audiences and strategies, and is not really addressing the purpose. Some overarching comments: The terms knowledge, education and information are used almost interchangeably, when they are not. It’s know clear what is meant by “knowledge”, for example, in comparison to “information”. Suggest using the terms “nutrition education” and “nutritional literacy”.

	<ul style="list-style-type: none"> • The sentence “This prioritization could be done by utilizing available and effective tools, key actors across food systems, and the places in which people access food in their daily lives” seems very generic and could be applied to anything. What is it exactly referring to?
<p>3.4.1. General comments</p>	<ul style="list-style-type: none"> • The section does not really address how to place people at the centre of their own dietary changes: how to involve them in efforts to recognize their nutritional needs, improve their diets considering the foods available and their food cultures, identify issues in their food environments and take action to demand healthier and cheaper foods. This would be a way of making individuals active and not passive actors of the food system. <p>With reference to heading:</p> <ul style="list-style-type: none"> • What is meant here by information, knowledge and education? These are very different concepts and they seem to be used interchangeably. <p>With reference to a):</p> <ul style="list-style-type: none"> • This is a very important point but it’s misplaced here. It should have been made earlier on. Shouldn’t this be an overarching consideration? • It would be good to launch a campaign of one visit to a doctor-nutritionist (free of charge) funded from the state budget for vulnerable groups of people mentioned here. <p>With reference to a) “people living with HIV and tuberculosis” and “people with disabilities:</p> <ul style="list-style-type: none"> • They are not really part as such of the lifecycle. <p>With reference to b):</p> <ul style="list-style-type: none"> • There is a great need of more research from developing countries on determinants of food choice, particularly in the context of the nutrition transition. This is key to put people at the centre of their change. • It is about educating individuals (not just passing on knowledge), in the true sense of “education”: to train, to provide skills, to increase motivation, to persuade to feel, believe, or act in a desired way, etc. <p>With reference to c) “health professionals”:</p> <ul style="list-style-type: none"> • What about educators? Teachers? Community workers? <p>With reference to c) “promote food culture”:</p> <ul style="list-style-type: none"> • Not sure what is meant with this. <p>With reference to c) “nutrition literacy”:</p> <ul style="list-style-type: none"> • This term has not been used before. Either the goal is promotion of sustainable healthy diets or the development of capacities for supporting that goal (e.g. food literacy). <p>With reference to e) “private sector actors”:</p> <ul style="list-style-type: none"> • This section is more related to supply side actions, and not really fitting for this section, unless consumers are directly and explicitly involved in the process. • The private sector responds to consumer demands and tastes (particularly smaller companies). As such consumer associations are needed to support the creation of demand for more nutritious food or healthier food product options.

<p>3.4.2. General comments</p>	<ul style="list-style-type: none"> • It is important to harmonize the terminology and the concepts that are being proposed. So far there is mention of nutrition education, SBCC, media campaigns, etc. • The points listed in this section are only aimed at advocating for nutrition should also focus on food systems efficiency (sustainable production and consumption, quality and safety of food, food waste reduction, etc.). <p>With reference to a):</p> <ul style="list-style-type: none"> • National food based dietary guidelines are amply published and shared within schools, media, etc. Development of FBDGs should also be followed-up by use of FBDGs by multiple actors and sectors and integration in policies and programs. They need to come alive! There are too many cases of having developed FBDGs only to be left on the bookshelves of ministries of health. <p>With reference to b):</p> <ul style="list-style-type: none"> • Unless these efforts are coupled with educational interventions, these actions are not fitting well in this section. • This issue goes well beyond the heading of knowledge, education and information. Is this the right place for it. <p>With reference to c):</p> <ul style="list-style-type: none"> • A separate point on ensuring that enforcement measures are in place and fines sufficiently heights to provide real deterrents are in place. There is ample evidence of failures re marketing of breast milk substitutes. <p>With reference to c) “labelling”:</p> <ul style="list-style-type: none"> • These should be always supported by an effective nutrition education component, to foster better behavioral outcomes. • This paragraph should be strengthened to encourage marketing of such food even mor, recognizing that everyone is vulnerable to marketing and advertising, not just children. Rules similar to best practices in marketing of tobacco should be established. <p>With reference to c) “warning signs”:</p> <ul style="list-style-type: none"> • These regulatory efforts are critical, but they mostly restrict the offer rather than increase knowledge. <p>With reference to d):</p> <ul style="list-style-type: none"> • Again this is extremely important, but it does not seem to fit in the section. <p>With reference to d) “legislative enforcement”:</p> <ul style="list-style-type: none"> • Not clear what international legislative enforcement is. Even multinationals operate within countries, and enforcement measures need to bite, including fines, profit forfeit and stock forfeit measures. <p>With reference to e) “decision making”:</p> <ul style="list-style-type: none"> • Is this referring to nudging? <p>With reference to f):</p> <ul style="list-style-type: none"> • This paragraph is vague and confusing. It would be better to list the responsibilities/actions of each sector/actor separately. In contrast, the formal education sector (from primary to tertiary school) has a much larger role to play but it’s barely mentioned in this section.
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	<ul style="list-style-type: none"> • It seems like a random set of actors. Why not teachers and educators? Chefs are only reaching a limited part of the population. Dietitians are not often trained in pedagogy, and private sector can often lead to conflict of interest. <p>With reference to f) “information interventions”:</p> <ul style="list-style-type: none"> • Information intervention seldom lead to changes in behaviours, practices or in development of capacities. <p>With reference to g) “nutrition information”:</p> <ul style="list-style-type: none"> • It is not only about nutrition information. This has been extensively proven by evidence. Information is not effective to enact changes. <p>With reference to h) “chefs”:</p> <ul style="list-style-type: none"> • It’s unclear what is the role chefs can play in coupling Nut Ed and maternal and child nutrition programmes. <p>With reference to i):</p> <ul style="list-style-type: none"> • SBCC is a form of nutrition education, but the way it’s used in this sentence is confusing, as if the aims of SBCC were not achievable with nutrition education. • And why not social marketing? These are various strategies for behavior change. The way they are used here are not serving the purpose but rather confusing potential adopters. <p>With reference to j) “ food waste”:</p> <ul style="list-style-type: none"> • Food waste reduction is extremely important, but it is a complex behavior that depends on many determinants (e.g. cooking skills, interpreting labels, motivations, etc). A more coherent and logical thinking needs to be applied to this section if specific practices are to be singled out. • Consider regulatory measure to work against food waste. E.g. change liability for donations, amend date labelling regulations, penalize food waste or require donations. <p>With reference to j) “awareness campaigns”:</p> <ul style="list-style-type: none"> • These are seldom about effective education. <p>With reference to j) “updating FBDGs to align...”:</p> <ul style="list-style-type: none"> • This does not make sense. Food-based dietary guidelines are evidence-based dietary (and lifestyle) messages aimed at promoting optimal health. Their recommendations do not need to be aligned with policies or programmes to tackle food waste. That’s a separate issue, that could be brought in a FBDG booklet as part of advice for the population; but food-based recommendations are never developed considering food waste. <p>With reference to k):</p> <ul style="list-style-type: none"> • This is more aligned with section 3.4.1. • In reality one of the main principles of nutrition education interventions is that they are based on formative research and on people’s baseline experience, and more often, the co-design of interventions is being done with participants. More importantly, changes in food practices and behaviours will only be maintained when the learning processes and the resulting changes are owned by people. • It’s not about the “promotion of nutrition education” but about “educating individuals on good nutrition”. There is a subtle but important difference.
3.4.3.	With reference to a) “ nutrition education curriculum”:

<p>General comments</p>	<ul style="list-style-type: none"> • Not only on nutrition, but on nutrition education and behavior change approaches: for health professionals to understand the psychosocial determinants of dietary choices and to better assist individuals in making dietary changes. Training on “nutrition” in health professions typically means teaching about nutrients and human digestion and metabolism, but this knowledge alone is by far not enough for them to be good agents of behavior change. • What about integration of nutrition in non-health curricular programs? <p>With reference to b) “culinary skills”:</p> <ul style="list-style-type: none"> • Culinary or cooking skills are just a part of the broader set of skills that are needed to practice and maintain a healthy and sustainable diet. • Given the relevance of promoting good eating habits in the first years of life, there should be a separate point about inserting high quality hands-on nutrition education modules (that include practice in school gardens, and cooking, etc.) in primary schools. <p>With reference to c):</p> <ul style="list-style-type: none"> • Again this is really a mix of concepts and interventions. In many countries where school meal programmes are not national or non-existing, the national school curriculum should still include food and nutrition education. <p>With reference to c) “policymakers”:</p> <ul style="list-style-type: none"> • Usually this is done by curriculum developers. <p>With reference to c) “culinary lessons”:</p> <ul style="list-style-type: none"> • Is this realistic in all contexts?
<p>3.4. heading Suggested edits</p>	<p>PEOPLE-CENTERED <u>FOOD SYSTEMS, AWARENESS RAISING, INFORMATION AND KNOWLEDGE SHARING, FOOD AND NUTRITION KNOWLEDGE, EDUCATION AND INFORMATION</u></p>
<p>Paragraph 41 Suggested edits</p>	<p>People, both individuals (rights-holders) and members of institutions (duty-bearers), are at the centre of food systems, acting as drivers and experiencing outcomes. Access to <u>quality information and effective knowledge</u>, education and the quality of information available to people on <u>production methods, nutritious</u> food, <u>sustainable</u> healthy diets and nutrition should become a priority. This prioritization could be done by utilizing available and effective tools, key actors across food systems, and the places in which people access food in their daily lives. It is also important to consider the range and diversity of food cultures, social norms and traditions that influence healthy diets.</p> <p>3.4.1 Putting people at the centre of <u>food system and</u> nutrition knowledge, education and information</p> <p>a) States should pay particular attention to dietary and nutritional needs across the entire lifecycle including pregnant and lactating women, women of reproductive age and adolescent girls, infants, children under five, <u>schoolchildren, adolescents, people living with HIV and tuberculosis, and</u> the elderly and people with disabilities. States should ensure food systems are delivering healthy diets for these all populations and mitigating against all forms of malnutrition.</p> <p>b) States should use the best scientific evidence <u>evidence-based, context-specific and people-centred food and nutrition education and other behavior-change</u></p>

~~strategies to promote education and knowledge of educate on sustainable~~ healthy diets, ~~food taste,~~ physical activity, food waste ~~reduction~~ and ~~food~~ safety, adequate breastfeeding and complementary feeding, taking into consideration cultural and social norms, ~~transforming discriminatory practices,~~ and adapting to different audiences and contexts. ~~To be effective such strategies require a prioritized behavior focus, appropriate duration of interventions, combination with food environment, food security, health and social protection programmes, and broader policy support.~~

- c) States, civil society, community leaders, and health professionals should promote food culture amongst communities, including access to culinary skills and stressing the importance of food within cultural heritage ~~with approaches such as Geographical Indications and GIAHS (Globally Important Agriculture Heritage Systems),~~ as a vehicle to promote nutrition literacy. This can be done through community participation, associations and educational institutions ~~targeting women and men.~~
- d) States should protect and promote the knowledge that ~~traditional and~~ indigenous peoples have with regard to methods of ~~generating producing,~~ preparing and preserving food through ~~their territorial management ancestral practices~~ that imparts nutritional and environmental benefits. ~~This can be done through the adoption and development of intercultural education into national education curricula, taking into consideration their food systems and its nutritional and medicinal values, indigenous languages and food culture, and by strengthening indigenous community learning centers.~~
- e) Private sector actors should increase the acceptability of nutritious food by producing and marketing packaged food of this kind in a way that is convenient for people to prepare, cook and eat, ~~while also considering to minimize the impact on the nutritional composition of the food and on the environment.~~
- e)f) ~~Food systems actors should ensure efficiency towards sustainable healthy diets is recognized and dedicated awareness raising campaign, trainings, and dissemination of information promoted.~~

3.4.2 Utilizing policies and tools ~~for food and nutrition education to increase knowledge, education and information~~

- a) States should develop national food-based dietary guidelines that define context-specific, sustainable and healthy diets by taking into account social, cultural, economic, ecological and environmental drivers.
- b) States should develop nutrition standards and regulations for the marketing of foods and beverages, ~~in particular~~ to children, and ban advertising of ~~less-nutritious-energy-dense~~ food to children, as they are particularly susceptible to the influence of food marketing.
- c) States should ~~work with food marketing and regulatory boards and food industry representatives to institute establish~~ easy-to-read front-of-pack labelling of ~~evidence informed metrics~~ food composition/~~nutritional~~ warnings such as overall fat quality (e.g. unsaturated to saturated fat ratio), trans-fats, carbohydrate

	<p>quality (e.g., carbohydrate to fiber ratio), added sugars, and sodium. Food with warning signs should be regulated – i.e. not sold in or near schools and not advertised to children.</p> <p>d) States should regulate the marketing of commercial infant formula and other breast-milk substitutes and implement the full set of WHO recommendations on the marketing of breast-milk substitutes and of food and non-alcoholic beverages to children. The International Code of Marketing of Breast-milk Substitutes²⁹ needs to be enforced through accountability mechanisms and international legislative enforcement.</p> <p>e) Private sector food actors should consider the design of food markets, restaurants and other places where food is sold or served <u>and information on food preparation and nutritional composition</u> to shape-encourage nutritious food choices and decision making. Incentives, sales and discounts should be put into place that encourage the placement and promotion of nutritious food products in retail spaces.</p> <p>f) States, chefs, dietitians, private sector food actors and NGOs and <u>practitioners (e.g. teachers, nutritionists, dieticians, nurses, medical doctors and other health and community workers,)</u> should implement <u>effective food and</u> nutrition education and information interventions based on Food-Based Dietary Guidelines, <u>when available</u>, and other policies related to food and diets, through improved school curricula, <u>school food and nutrition education programmes</u>, nutrition education in the health, agriculture and social protection services, and community interventions. <u>Formal state-led farming schools or farming training programs could serve as platforms for educating the next generations of farmers to more sustainable nutrition education and information interventions, which should be culturally appropriate.— and nutrition-oriented practices.</u></p> <p>g) States should consider the inclusion of nutrition information within agriculture <u>and other</u> extension technical packages as a way to support producers in increasing the production of high nutrient density crops, and crop diversification <u>and appropriate integration with tree-livestock-fish production.</u></p> <p>h) <u>The health sector, social protection, NGOs, dieticians, and chefs and community services, NGOs</u> should consider coupling <u>food and</u> nutrition education and counselling with <u>States'</u> maternal and child nutrition programmes (e.g. food supplements, micronutrient supplements, or conditional cash transfers) to double down impacts on dietary and nutritional outcomes.</p> <p>i) States, UN and NGOs should promote social and behavior change communication (SBCC) and social support interventions as a way to improve nutrition. SBCC can be used by different actors as a way to influence behaviour change by positively influencing knowledge, attitudes and social norms, coordinating messaging across a variety of communication channels to reach multiple levels of society.</p>
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²⁹ [International Code of Marketing of Breast-Milk Substitutes](#). WHO, 1981. Geneva. [International Code of Marketing of Breast-Milk Substitutes](#). WHO, 1981. Geneva. [International Code of Marketing of Breast-Milk Substitutes](#). WHO, 1981. Geneva.

- j) States, the educational sector, chefs and private sector food actors should ~~educate~~ raise awareness and train all food system stakeholders to prioritize the reduction of post-harvest losses and food waste. Actions could include awareness campaigns at national, regional and global levels, labelling schemes and technological innovation, ~~and updating Food-Based Dietary Guidelines to align recommendations with policies and programmes to tackle food waste.~~
- k) States should draw on the knowledge, experience and insights of individuals who are not usually regarded as members of the nutrition community - e.g. community and indigenous peoples' representatives ~~leaders~~, school and university teachers, chefs, supermarket buyers ~~consumers~~, influencers on social media, youth leaders, young entrepreneurs, mayors and local communities - in the development of multi-component, community-based ~~media campaigns promoting nutrition education and the benefits of healthy diets~~ programmes that integrate food and nutrition education, following national dietary guidelines. FAO Biodiversity Mainstreaming Platform³⁰ could be used as a neutral forum for multi-stakeholders dialogue to produce those guidelines and programmes, and facilitate the sharing of information between stakeholders and policy-makers.

3.4.3 Promoting “hubs” for sustainable healthy diets and nutrition knowledge, education and information

- a) Universities and schools should institute a food and nutrition education curriculum, including behavior change approaches, for all medical and nursing students during training and public health professionals.
- b) States should support school and worksites to serve nutritious food to school-aged children and workers and promote culinary skills among school age children, adolescents and in adults regardless of their sex, to promote communal meal times, socializing around food, the consumption of sustainable healthier-healthy diets and the need to reduce food waste.
- c) States should link the provision of healthy school meals with clear nutritional objectives and be adapted to the needs of different age-groups, with special attention to the needs of adolescent girls. Policymakers should review education-national school curricula to ~~incorporate nutrition education principles~~ integrate competency-based and holistic food and nutrition education, while adopting practical teaching tools such as school gardens and culinary lessons, and providing technical support and capacity development to help schools implement changes.
- e)d) States should support the Global Hub on Indigenous Food Systems bringing together indigenous representatives, universities, research centers and local communities to undertake a dialogue of scientific and indigenous peoples knowledge that can bring evidence for sustainable food systems for healthy diets.

³⁰ For references, see the FAO Biodiversity Mainstreaming Platform brochure.
<http://www.fao.org/3/CA2403EN/ca2403en.pdf>

<p>New text</p>	<p><u>3.5 TRADITIONAL AND INDIGENOUS FOOD SYSTEMS FOR SUSTAINABLE AND HEALTHY DIETS</u></p> <p><u>a) States and non-state actors should acknowledge indigenous peoples’ and traditional knowledge about sustainable territorial management, ecosystem and natural resource management, and nutrition and medicinal value of foods generated by their traditional and indigenous food systems.</u></p> <p><u>b) States should promote dedicated research and awareness raising on traditional and indigenous food systems in order to benefit from their capacity to broaden the existing narrow world’s food base and improve nutrition.</u></p> <p><u>c) States should develop policies, regulations, governance and monitoring mechanisms to enhance the recognition of the collective rights of indigenous peoples and other communities over their lands and territories. States in collaboration with indigenous peoples and other communities should adopt legislation and policies protecting the landscape and territorial management practices of indigenous peoples and other communities in recognition and respect of their distinct livelihoods, natural resources and management role.</u></p> <p><u>d) States should develop policies, regulations and governance mechanisms to ensure that the property rights of indigenous peoples over their seeds, planting material and natural resources are guaranteed.</u></p> <p><u>e) States and indigenous peoples should support the commercialization of indigenous peoples foods respecting: their the principle to free, prior and informed content; interculturality; traditional knowledge; and territorial management practices. This could be done through (i) building capacity of indigenous peoples and other communities to add value to their products through certification of their products and (ii) utilize the whole production chain (production, packing, labeling, certification, etc.) to commercialize indigenous foods through registered Indigenous Peoples’ customary institutions and federations at local and national levels.</u></p> <p><u>a)f) FAO Biodiversity Mainstreaming Platform³¹ should be used as a neutral forum for multi-stakeholders dialogue and facilitate the sharing of information between stakeholders and policy-makers.</u></p>
<p>Paragraph 42 General comments</p>	<ul style="list-style-type: none"> • There should be a strong statement about gender equality, more generally as a factor that would have positive impact on nutrition and food systems, and refer to the full range of rights in CEDAW, and in particular articles 12 and 14, as well as CEDAW committee general comment on rural women. CEDAW puts an obligation on states not only not to discriminate but to work on changing discriminatory social norms. <p>With reference to “the household’s diet”:</p> <ul style="list-style-type: none"> • Also about agricultural production systems and methods! That’s why those need better nutrition education. This needs to be included. <p>With reference to “family’s nutritional status”:</p>

³¹ For references, see the [FAO Biodiversity Mainstreaming Platform brochure](http://www.fao.org/3/CA2403EN/ca2403en.pdf).
<http://www.fao.org/3/CA2403EN/ca2403en.pdf>

	<ul style="list-style-type: none"> Women's role along the food value chain has also relevance and importance for managing availability access, and stability of food security. <p>With reference to “women and girl’s empowerment”:</p> <ul style="list-style-type: none"> It would be extremely difficult to promote putting all the burden of caring for the family's nutritional status on women. This means manifesting their role at home and impeding their economic empowerment. Why not empower men to take a more active role in nutrition?
3.5.1. General comments	<p>With reference to a) “prioritization”:</p> <ul style="list-style-type: none"> Prioritize over what? Isn't it discriminatory to prioritize the nutritional wellbeing of adolescent girls and women over children and/or men? <p>With reference to b) “recognize and value”:</p> <ul style="list-style-type: none"> How should this be done? How can this be reconciled with promoting gender equality and women's economic empowerment? <p>With reference to c) “labour laws”:</p> <ul style="list-style-type: none"> Unsure as to whether this includes paid maternity leave. Regardless, it should probably be spelled out so that it’s clear.
3.5.2. General comments	<p>With reference to a): “in line with the VGGT”:</p> <ul style="list-style-type: none"> Note that there is a lot of issues here, such as education, training markets and information not covered in the VGGT and SDG 5.a.2. <p>With reference to b) “crops”</p> <ul style="list-style-type: none"> Crops exclude perennials. <p>With reference to c):</p> <ul style="list-style-type: none"> Here food preservation and processing at household level are promoted as labour and time saving technologies for women. How can this be reconciled with the call above for less food preservation and processing in general (by the industry)? An increased female labour force participation is often cited as one of the drivers for changing diets globally (because of a greater reliance on convenience food due to time constraints). Is it suggest here to revert this?
3.5.3. General comments	<p>With reference to a):</p> <ul style="list-style-type: none"> The edits suggested comes from Principle 3 of the CFS-RAI, on which this paragraph is based.
3.5. heading Suggested edits	GENDER EQUITY, <u>GENDER EQUALITY, NON-DISCRIMINATION</u> AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS
Paragraph 42 Suggested edits	<p>Gender relationships and <u>cultural</u> norms are among the most significant drivers of <u>efficient food systems and</u> healthy diets. In many countries, women make decisions about <u>agricultural production systems and methods</u>, the household’s diet and, as primary caregivers, they have an influence on the family’s nutritional status. Therefore, women’s and girl’s empowerment through education, information and access to resources and services is key to <u>enhancing food systems’ efficiency and</u> improving nutrition. Improving women’s wellbeing, ensuring access to financial, technical and biophysical resources, improving agency, voice and status, and challenging the power relationships that limit</p>

choices, are promising policy entry points to empower women and ultimately, improve food security and nutrition.

3.5.1 Recognizing women’s nutritional status and deprivation

- a) States, UN agencies and NGOs should prioritize the nutritional wellbeing of adolescent girls and women and provide health and nutritional care and services through various sectors. This can be done by ensuring they are central to national development strategies, and the recipients of social protection policies and benefits, which can break the inter-generational cycle of malnutrition.
- b) Acknowledging the significant time and work burden of women in the preparation of nutritious food at the household level, and their roles in agriculture and food production, States should recognize and value the importance of unpaid care work at household level through protective laws, social protection programmes, and redistribution of workload at household level, and other benefits.
- c) States should create an enabling environment to promote breastfeeding, ensuring that decisions to breastfeed do not result in women losing their economic security or any of their rights. This would include removing workplace-related barriers to breastfeeding (breaks, facilities, and services) and labour laws to protect women who chose to breastfeed.

3.5.2 Promoting and acknowledging women as food system entrepreneurs

- a) States should advance women’s equal tenure rights, and their equal access to and control over productive land, natural resources, inputs, productive tools, and ~~promote~~ing access to education, training, markets, and information in line with the *VGGT*, *CFS-RAI* and *SDG indicator 5.a.2. on women’s equal right to land in the law*. This can be done by strengthening women’s access to natural, physical, financial, human, and social capital, so they can effectively contribute to sustainable food systems that promote nutrition.
- b) States, UN agencies and other International Organizations, the private sector, and NGOs should enhance women’s roles in agriculture and all along the value chains (also as food processors and traders) by ~~giving~~ enhancing women’s decision-making power over what is produced, why, and how. Women should be offered social protection to guarantee their access to basic needs as well as extension and advisory services for ~~crops-plant~~ and animal products that they produce or process, capacity-~~development~~ building to engage with traders, financial services (credit and savings mechanisms), and innovative entrepreneurial opportunities across food systems.
- c) States and the private sector should promote labour and time saving technologies for women such as food harvesting, preservation and processing equipment, cold storage, heat and thermal processing, grinding/blending devices, energy saving stoves, and ~~modern-appropriate~~ farm equipment for ploughing, cultivating and harvesting nutritious food as well as for feed preparation, feeding, milking, sheering.

	<p>d) States should facilitate women’s access to opportunities to generate income and increase their participation in decisions on the use of household income. This would include activities such as household and business budget training, and tools to help men and women strengthen their intra-household communication and decision-making skills.</p> <p>3.5.3 Empowering women across food systems</p> <p>a) States should <u>adopt innovative and/or proactive approaches, measures, and processes to</u> enhance women’s meaningful participation in partnerships, decision-making, leadership roles, and the equitable sharing of benefits. A priority should be to strengthen rural <u>and indigenous</u> women’s participation and representation at all levels of policymaking for food security and nutrition, to ensure their perspectives are equally taken into account.</p> <p>b) States should increase women’s human capital by ensuring that women and girls have access to <u>culturally appropriate</u> education and literacy, health care services and social services, as a way to increase household nutritional status.</p> <p>c) States should enshrine-adopt <u>laws and policies</u> that give women and men shared participation in political decision-making and equality, supporting 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.</p>
<p>3.6. General comments</p>	<ul style="list-style-type: none"> It is not clear why this section should be on the same level as the others. It seems more like an annex.
<p>3.6.1. General comments</p>	<p>With reference to a) “should ensure that food security and nutrition assessments are undertaken throughout a crisis”:</p> <ul style="list-style-type: none"> This could perhaps not always be a priority in a crisis – it depends. <p>With reference to a “well-coordinated with governments”:</p> <ul style="list-style-type: none"> This is not actually done the governments themselves, or? <p>With reference to d) “ensure micronutrient fortified food”:</p> <ul style="list-style-type: none"> This should not be a general guideline – in fact micronutrient fortified foods may NOT be recommended in many contexts.
<p>3.6.3. General comments</p>	<p>With reference to “making food systems resilient”:</p> <ul style="list-style-type: none"> This is also closely linked to well integrated diverse production systems! Addressing the root causes of risks and increasing the resilience of livelihoods and food systems to lessen the impacts of natural and man-made disasters can also introduce effective adaptation measures with co-benefits for climate change mitigation.
<p>Paragraph 43 Suggested edits</p>	<p>This part build upon the 11 principles in the FFA. In situations of humanitarian crises, there is a critical need for nutrition interventions that link humanitarian responses with longer-term strategies to strengthen the resilience of food systems and improve food security and nutrition. For populations with optimal nutritional status at the onset of a humanitarian crisis, their status needs to be protected so that it does not worsen. <u>For</u></p>

those who are already dealing with a malnutrition, emergencies can be a tipping point which can exacerbate malnutrition issues.

3.6.1 Improving the nutritional quality of food and nutrition assistance

- a) States, all parties involved in conflicts, natural disasters and food assistance, including humanitarian organizations, should ensure that food security and nutrition assessments are undertaken throughout a crisis. These assessments should adhere to internationally accepted methods, and be impartial, representative and well-coordinated with governments.
- b) States, parties involved in conflict and natural disasters and humanitarian organizations should provide timely, safe, and sufficient assistance in response to humanitarian crises in a flexible manner, conforming with the beliefs, culture, traditions, dietary habits and preferences of individuals, in coordination with all stakeholders. The assistance should promote survival, uphold dignity and build resilience.
- c) States should ensure the basic nutritional needs of those people affected by a humanitarian crisis, including the most nutritionally vulnerable. The food items provided should be of appropriate safety, quality, acceptable, and can be used efficiently and effectively. Food must conform to the food standards of the host country's government as well as to the Codex Alimentarius standards about quality, packaging, labelling and fitness for purpose.
- d) States and humanitarian assistance organizations should explore partnerships with industry to ensure micronutrient-fortified food is available through social protection mechanisms and acute malnutrition management programmes, with improved coverage during times of crisis. States, UN agencies and NGOs should work to ensure infant and young child feeding practices are 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.

3.6.2 Protecting nutritionally vulnerable groups

- a) States and humanitarian organizations should pay particular attention, protection, and facilitate access to nutritious food and nutritional support to pregnant and lactating women, women of reproductive age and adolescent girls, infants, children under five, people living with HIV and tuberculosis, the elderly and people with disabilities.
- b) States 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. The design and delivery of food assistance should minimize the risk to recipients and contribute to preventing and ending gender-based violence.

	<p>c) States, 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.</p> <p>3.6.3 Making food systems resilient</p> <p><u>a) As biodiversity plays a central role in improving the diversity and resilience of food systems, States should avert devastating, costly famines by strengthening local food systems and long-term development support, and by ensuring crop diversification.</u></p> <p>a)b) States should develop early warning systems and food and agriculture information systems that are able to detect and monitor threats to livelihoods. These early warning systems should integrate with broader food analysis systems including the monitoring of available and affordable nutritious food at the local level.</p> <p>b)c) States should invest in disaster risk reduction measures that benefit those most at risk or most in need. In particular, productive assets should be protected from severe weather and climate impacts in a way that strengthen the resilience of affected populations and their ability to cope with shocks from conflicts, climate change or natural disasters. 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.</p> <p>c)d) States should encourage local procurement and the use of local organizations in the implementation of humanitarian food assistance and livelihood programmes to support economic recovery and development, to strengthen sustainable local food systems and to foster the ability of smallholders to access productive resources and markets.</p>
<p>Part 4 General comments</p>	<ul style="list-style-type: none"> • There is little to no mention on monitoring. This section should address the monitoring of the use and application of the guidelines. • It addresses only how it is expected they will be used. However, the VG on Land Tenure Governance are equally vague about actual monitoring. A one-size-fits-all monitoring framework is not ideal, but it would be immensely helpful to users to include some examples (e.g. Brazil). Policy priorities and indicators should be defined by countries – ideally by national intersectoral FSN bodies. The process of defining them builds shared understandings and buy-in among the different sectors. • What about the sustainability and the food systems approach? Suddenly they seem to have disappeared from the picture in this section (rather focused on the nutrition Decade and WHA targets). What about the other SDGs? • Is it possible to leave a space for revision and concretion of the guidelines following the UN Food Systems Summit in 2021? • It is expected that the Voluntary Guidelines will also be used by States for identifying policy opportunities or enabling sustainable healthy diets through the

	food system and assess the political economy to bring about policy change and assist food systems analyses at national or subnational level.
Paragraph 44 General comments	With reference to “national policies, programmes and investment plans”: <ul style="list-style-type: none"> The language should emphasize an integrated cross-sectoral strategy.
Paragraph 44 Suggested edits	All CFS stakeholders are encouraged to promote at all levels within their constituencies, and in collaboration with other relevant initiatives and platforms <u>such as the UN governance bodies for indigenous peoples</u> , the dissemination, use and application of the VGFSyN to support the development and implementation of national policies, programmes and investment plans <u>across all sectors that compose an integrated cross-sectoral strategy</u> . States are invited to promote the use and implementation of the VGFSyN through coordinated and multi-sectoral policies and interventions, ensuring that activities of different ministries converge toward the promotion of sustainable food systems that enable sustainable and healthy diets and improve nutrition.
Paragraph 45 Suggested edits	The VGFSyN should be used to foster dialogue <u>and coordination</u> between different actors across sectors, ensuring that all relevant stakeholders, including representatives of the most nutritionally-vulnerable groups, are involved and engaged, and promoting policy coherence while avoiding duplication of efforts.
Paragraph 47 General comments	With reference to “evidence-based”: <ul style="list-style-type: none"> What do we mean by evidence-based? This is an easily abused concept, with a history of abuse and distortion in favor of corporate rather than nutrition friendly interventions.
Paragraph 48 Suggested edits	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 right holders and duty bearers’ endeavors. The VGFSyN should contribute to the design of <u>sustainable food systems and</u> nutrition-sensitive investment that aims 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.
Paragraph 50 General comments	With reference to “SMART”: <ul style="list-style-type: none"> The “measurable and achievable” aspects are related to defining indicators which are in turn related to monitoring.
Paragraph 50 Suggested edits	The intention is The VGFSyN should to support countries in <u>making defining priority actions and formulating</u> “SMART” commitments ³² and that will enable achieving <u>food system and</u> nutrition objectives as well as the creation of informal coalitions of countries as a way to accelerate and align efforts around specific topics linked to one or more action areas of the Nutrition Decade <u>as well as SDGs</u> . This can be done through advocating for the establishment of policies and legislation, allowing the exchange of

³² In the context of the UN Decade of Action on Nutrition and ICN2 follow-up process, the next step is to translate the recommended policy options and strategies into country-specific commitments for action. These commitments should be specific, measurable, achievable, relevant and time-bound. www.un.org/nutrition/commitments
<https://www.who.int/nutrition/decade-of-action/smart-commitments/en/>
<https://www.who.int/nutrition/decade-of-action/smart-commitments/en/>

	practices and experiences, highlighting successes and lessons learnt, and providing mutual support to accelerate its implementation.
Paragraph 51 General comments	<ul style="list-style-type: none"> • A number of countries have established food and nutrition security councils and other coordination mechanisms. These should be promoted here. See FAO 2009 Guide on legislating for the right to adequate food. We are mixing the national with the global. Countries establish coordination mechanism, which the SUN movement can support, and SCN can also support coherence in how the UN supports countries in this. • Attention to power dynamics in multi-stakeholder mechanisms is needed – i.e. the inclusion of civil society groups and restrictions on participation/power and undue influence of private sector. • Why specific reference to the SUN movement? Particular emphasis should be given to country-level initiatives – enabling and empowering governments, supporting them to define their own agendas, independent of donor agendas.
Paragraph 51 Suggested edits	Multistakeholder platforms, partnerships, <u>processes</u> and frameworks at local, national, and regional levels, and across multiple sectors, have to be established or <u>existing ones</u> strengthened as a key element contributing to reshaping and promoting sustainable food systems for <u>healthy diets and</u> improved nutrition. Particular attention should be paid to those partnerships and platforms that are already promoting multistakeholder efforts for improved nutrition at country level, such as the Scaling Up Nutrition (SUN) Movement. <u>In line with recommendations from the HLPE Report on “Multi-Stakeholder partnerships to finance and improve food security and nutrition in the framework of the 2030 Agenda” (www.fao.org/3/CA0156EN/CA0156en.pdf), a</u> Actions should be taken to improve partners’ capacity to design, manage and participate in these partnerships, to ensure transparency and accountability and promote good governance as a way to ensure effective results. Moreover, actions and synergies should be implemented through the United Nations <u>System</u> Standing Committee on Nutrition (UNSCN), which is responsible for promoting policy coherence and advocacy for nutrition throughout the UN system.
Paragraph 52 General comments	Contextualizing and adapting to local contexts are more than important, without this the guidelines will not be able to be implemented.
Paragraph 52 Suggested edits	Efforts should be made to increase the human and institutional capacity of countries to implement the VGFSyN and to identify priorities toward their operationalization at national level <u>as well as monitoring</u> . The organization of multistakeholder workshops and training, as well as the development of user-friendly and technical guides, are important to contextualize and adapt the agreed global policy guidance to local contexts.
Paragraph 53 General comments	<ul style="list-style-type: none"> • Law making is the primary role of parliamentarians, policy making of governments. However, governments sometimes submit policies to parliament as well, and very often initiate legislation by submitting bills to parliament. Parliamentarians do not design policies, but they can advocate for changes and adopt resolutions to require government action - depending on the national legal system.
Paragraph 53	Parliamentarians and their regional and sub-regional alliances have a key role in <u>designing adopting legislation and</u> policies <u>(depending on national context)</u> , raising awareness and

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Suggested edits	promoting dialogue among relevant stakeholders, and allocating resources for the implementation of laws and programmes dealing with food systems and nutrition.
Paragraph 54 Suggested edits	The dissemination and uptake of the VGFSyN should be facilitated through the identification of “champions” that could raise awareness across sectors, and the organization of advocacy campaigns at different levels. CFS provides a forum where all relevant stakeholders can learn from the experiences of others in applying the VGFSyN and assess their continued relevance, effectiveness and impact on food security and nutrition. <u>Private sector food actors should also be involved and should commit in the implementation of the VGFSyN individually and through their organizations such as the World Business Forum and others as the main actors in the food systems.</u>