

CFS Voluntary Guidelines on Food Systems and Nutrition

Comments by Norway to Draft One

Part 1 and 2

Conceptual Framework

- Norway supports the Food System approach to nutrition, however the document lacks a clear vision. This is evident in the section 1.2 "Objectives and Purpose" and in particular para.19. The terms of reference adopted at CFS in 2018 should be built on, in particular we find paragraph 4 as useful: "CFS work is expected to identify policy changes needed for reshaping food systems to improve nutrition and enable healthy diets. The purpose is to address the key causes of vulnerability to all forms of malnutrition in different types of food systems in both rural and urban areas with special attention to the poorest and the most nutritionally vulnerable."
- The document would benefit from a more elaborated conceptual framework, which in turn would make the recommendations more precise and relevant.

- **Food Systems:** The definition and understanding of Food Systems is a key concept. As the HLPE report 2017 states, "Food systems can be considered at different scales (from global to local levels), and even from a household perspective. Multiple food systems co- exist simultaneously within any given country". The guidelines should address the diversity and co-existence of different food systems.

- **Food supply chains:** is used to describe the activities that take food into and from production to consumption. However, the concept is not included under Part 2 "key concepts", and is not well reflected in the document. Norway would suggest a holistic approach along the entire food value chain, from primary food production to consumption, paying attention to all the elements of food security (access to sufficient, safe, nutritious foods that meets dietary needs and food preferences).

Food production systems- in the agriculture and fishery sector- affect food availability and affordability, and therefore the quality and diversity of diets. The different types of foods available, as well as how they are produced, matters for nutrition outcomes. It should be considered how this aspect could be better reflected in the document.

- **Healthy and Sustainable Diets:** As underlined in the HLPE report 2017, a key element of healthy and sustainable diets is the diversity of foods of high nutritional quality, (in addition to being safe to consume, affordable, accessible, culturally acceptable etc.) Diets consist of a variety of basic food groups, although the types and amounts of foods within these groups will vary depending on geographic location and cultural context. The ICN2 Rome Declaration also emphasizes "diversified diets" as key.

Structure

- The content of Part 1 and 2 seems to be overlapping, as many points are reiterated. As an example, section 1.2 "Objectives and Purpose" and 2.2 "Guiding principles" seem to be making the similar points in para. 20 and 34 a). We suggest a more stringent structure, that would make the main points more clear to the reader.
- Guiding documents for the VGSSyN should be highlighted in the structure. (We are not sure if the heading in 1.3 accurately describes this section.) The last sentence of para 25 reads "CFS guidance should build on and integrate existing instruments and frameworks for action adopted in the context of the UN system (...). This sentence could be highlighted in a separate paragraph, and more consideration should be given to relevant documents for the guidelines on food systems and nutrition. Among those that should be reflected are the recent publications of IPCC and IPBES (see comment below). The role of GSF as an overarching framework and reference point for food security and nutrition strategies, policies and actions, could be made clearer.

General comments to part 1 and 2

- **Sustainable Development Goals** The guidelines are relevant to all of the Sustainable Development Goals, not just some. (ref. para 17). In particular we would like to underline the relevance of SDG17 on partnerships, SDG13 (climate), SDG14 (life below water) and SDG15 (life on land) are mentioned. In addition, energy is essential to ensure working food systems (SDG7) and innovation/infrastructure are key to help food systems function better (SDG9).
- **Overweight and obesity** The consequences of overweight and obesity include more aspects than addressed, e.g. overweight and obesity during pregnancy may have negative consequences for foetal development, increases the risk of adverse pregnancy outcomes and has impact beyond intrauterine and neonatal life to childhood, adolescence and adulthood.
- **Fisheries and aquaculture and GSF:** This guideline should follow the recommendation in the CFS GSF, and make fish a visible, integral element. An important step is to use an inclusive language (e.g. food production instead of agriculture) and include reference to the GSF policy recommendations on sustainable fisheries and aquaculture for food security and nutrition (<http://www.fao.org/3/a-av032e.pdf>). *Please find specific suggestions at the end of the document.

Moreover, scientific reports shows positive effects, both from a nutritional and climate perspective, of an increased seafood consumption. E.g. the recent blue paper from the High Level Panel for a Sustainable Ocean Economy (2019), which concludes that food from the ocean has the potential to supply over six times more food than it does today. It can help combat hunger, malnutrition, supply workplaces and cut carbon emissions.

- **GSF:** GSF already contains several advice on policy, management and enforcement challenges in order to maintain and enhance the contribution of various types of sustainable food production to nutrition and food security. GSF should be referred to both in part 1,2 and 3.
- **IPPC and IPBES** We wish to highlight, also within the guidelines, that the IPCC and IPBES produced extensive knowledge in 2019 showing that more sustainable food systems are instrumental to addressing climate change, biodiversity loss and mitigation. These issues are interlinked.
 - Paragraph 12 addresses the issue of unsustainable consumption, waste and inefficient resource utilization within current global food systems. It should be considered if the link between agriculture and deforestation should be made explicit in this paragraph.
 - Food waste should be included in section 1.1, para. 12: "Current global dietary trends *and food waste* are negatively impacting (...)"
 - "Loss of biodiversity" should be included in 1.1. paragraph 10.
 - It should be considered if the role of forests for nutrition should be included. For example, forests and wild biodiversity provide nutritionally important foods (including fruits, vegetables, bush meat, fish and insects) that contribute to the diversity and nutritional quality of diets. Forests and trees provide fuelwoods.

Part 3

Structure

- Climate adaptation and mitigation is addressed in a separate section 3.2.6, but it should be considered how recommendations on these topics could be integrated and related more to other sections, such as 3.2.1 "ensuring sustainable use and management of natural resources". It should also be considered how this section could be linked to recommendations under 3.6.3 "making food systems resilient", such as early warning systems, disaster risk reduction etc.
- A separate section is dedicated to Gender equity and women's empowerment under 3.5, however it should be considered if recommendations related to gender equity and women's empowerment could be integrated in other relevant sections.

Recommendations

- Section 3.2.6 on "climate adaptation and mitigation" should also address mitigation, by highlighting the need to reduce emissions throughout the value chain.
- The Global Strategic Framework for Food Security and Nutrition (GSF): GSF already contains policy recommendations in many relevant areas, such as agriculture, livestock, forestry. The CFS GSF recommendations on Sustainable Fisheries and Aquaculture for Food Security and Nutrition, <http://www.fao.org/3/a-av032e.pdf>, contains several advice on policy, management and enforcement challenges in order to maintain and enhance the contribution of sustainable fisheries and aquaculture to nutrition and food security. Several of these recommendations could be included in chapter 3. They are on the same level as those who are included in draft one. Many of the examples included in draft one refers to actions in land based production. We encourage the drafting group to go through the recommendations on fisheries and aquaculture, and include/ refer to the relevant paragraphs. These are highly relevant to the guideline on food systems and nutrition.
- Sustainability should be more clearly reflected in some recommendations, such as in 3.1.1.c, 3.1.2 b "Promoting policy coherence by integrating nutrition and *sustainable food* into national development".
- Recommendations on Adaptation and resilience should be included. 3.6.3 b: States should develop plans and implement measures to reduce risk to food systems in the medium to long- term. Sustainable resource management such as water use, soil health and crop diversity can be instrumental in periods of extreme weather
- The recommendations are in general directed to what states should do, but users of the guidelines are expected to be different actors in the food system. It could be made clearer which roles and responsibilities the governments have towards the other actors in a food systems. Some of the recommendations should be clearer directed to governments.
- It is mentioned that the guidelines should provide policy entry points also related to consumer behavior (mentioned in para 36), however the actual recommendations could benefit from being more specific on the linkages between marketing efforts and consumer behavior.
- Marketing and guiding principles of responsible marketing is also a part of the food systems.
- The many recommendations are sort of a shopping list of efforts which governments can look at. There is no mention in the document that the development of national action plans or strategies on sustainable food systems should be encouraged. This is one of the recommendations which will come out of the Nutrition for Growth summit taking place in December in Tokyo. There should be some reflection and similarity between the recommendations in the voluntary guidelines and the ones coming from other international meetings.

- Establishing sustainable value chains and ensuring local value creation of agricultural products are not adequately reflected in the recommendations. Processing food is barely mentioned. Seems that the recommendations are mostly referring to fresh food reaching markets. Strange as processed food items are mainly sold in Western markets/supermarkets.
- The issue of rapid urbanization which dominates the demographic changes in many low- and middle income countries is not sufficiently reflected among the recommendations. The need for urban and peri-urban food production are mentioned, but this will only be a partial solution to the big challenge of securing healthy food in the urban markets. Policy recommendations to underpin the challenges of bringing healthy, less processed food from rural to growing urban areas in big quantities, that can compete with ultra-processed food in the growing urban markets should be included.
- Some of the recommendations will need strong institutions for the recommended policy to be implemented. Example are food control authorities to secure regulations for safe food and responsible marketing of food. The need for institutional, organizational and capacity building is immense in some countries, and it should be stated that this is the national government's responsibilities.

*Suggestions for making the fishery sector more visible:

Page 3, no 10

"Climate change, **agriculture food production**, and nutrition are interconnected. 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 food production**, with the"

Page 4, no 14

"... sectors such as health, **agriculture food production** and food systems, education, environment, water, sanitation,"

Page 5, no 20

"... across sectors such as health, **agriculture food production**, education, environment, water, sanitation, gender, social protection, trade, employment, and finance – all of which impact nutrition outcomes.

Page 5, no 17.

The achievement will also assist to achieve **SDG 13, 14, 15** (climate action, life below water and on land). We suggest to include these.

Page 6, no 24 c)

"... regulatory frameworks, land, **oceans and inland waters** tenure, conflicts, and humanitarian crises...."

Page 7, no 26 should include

- CFS Policy Recommendations on Sustainable Fisheries and Aquaculture for Food Security and Nutrition (2014)

Page 7, no 27

- i) Farmer and fisheries organizations.

Page 11, 3.1.3 b)

"... nutrition, food and agriculture, fisheries and aquaculture, national policies and favour the transition..."

Page 12, 3.2.2

Promoting nutrition within agriculture and food production

- a) "States should promote nutrition-sensitive agriculture and diversified food production through the integration of nutrition objectives into national food and agriculture food production policies".
- b) "...while enhancing farmers' and fisher folks income and livelihood