



CFS POLICY PROCESS ON THE DEVELOPMENT OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS AND NUTRITION

TEMPLATE FOR SUBMISSIONS

- 1. Does Chapter 1 adequately reflect the current situation of malnutrition and its related causes and impacts, particularly in line with the goals and targets of the 2030 Agenda? What are the underlying problems that currently hinder food systems to deliver healthy diets?**

- The introductory chapter should clearly contextualize the Guidelines in a human rights framework and particularly the Right to Adequate Food. It's progressive realization is in the mandate of the CFS and should be the final aim of a transition towards healthy and sustainable food systems.
- Chapter 1 should also locate the Guidelines in the context of other CFS policy instruments, such as the VGGT and RAI, the recommendations on Connecting Smallholders to Markets, and on the Roles for Livestock for Sustainable Agricultural Development for Food Security and Nutrition. Reference should also be made to relevant UN instruments such as the UN Declaration on the *Rights of Peasants* and Other People Working in Rural Areas and The *United Nations Declaration on the Rights of Indigenous Peoples*.
- The Guidelines should put equal emphasis on health, sustainability and social equity as requirements that should be met by food systems.
- Regarding the causes of the current situation of malnutrition, particularly its basic causes (para 6), chapter 1 is still rather weak. Explicit reference should be made to inequality in various forms and to power asymmetries. Food systems dysfunctionalities rooted in inequalities and power asymmetries between actors in the food system and their negative impacts on human and planetary health should be addressed and backed by latest evidence (e.g. the [IPCC report on Climate Change and Land](#), the [Lancet report on the Global Syndemic of Obesity, Undernutrition, and Climate Change](#) etc.)

- 2. What should be the guiding principles to promote sustainable food systems that improve nutrition and enable healthy diets? What are your comments about the principles outlined in Chapter 2? Are they the most appropriate for your national/regional contexts?**

- Stronger reference should be made to the Human Rights as guiding principles and particularly the realization of the right to adequate food (the full definition should be provided as to [General Comment No. 12](#) of the United Nations Committee on Economic, Social and Cultural Rights). The interrelatedness and indivisibility of human rights needs to be considered, e.g. the right to health can't be realized in isolation from the realization of women's rights or the right to food. Human rights principles such as non-discrimination, participation and accountability to equally be included as guiding principles.
- Social equity should be included as a guiding principle. Any policy measure towards the transition of food system should be effective for the most vulnerable groups.
- Under an evidenced-based approach, evidence that has been co-created between researchers and local communities should be explicitly mentioned.
- Diets should not be defined with regard to health, but with equal weight with regard to their sustainability. The following definition proposed by the CSM should be used *"Healthy and sustainable diets are diets that are balanced and varied, and provide the nutrients required to live a healthy and active life for both present and future generations. They are composed of locally produced fresh and seasonal food, wherever possible, and contain a high proportion of foods that are not or only minimally processed. Healthy and sustainable diets are based on production modes that function in harmony with nature and its species, preserve and promote biodiversity, consciously use limited natural resources, respect peasants' and workers' rights and guarantee their livelihoods, while contributing to overall social justice. They are diets adjusted to the personal needs of individuals (personal characteristics and circumstances), the local context, and cultural and other preferences. Beyond the combination and nutritional content of food, the way food is prepared and consumed are key determinants for a diet to be healthy. A healthy diet also presumes the safety of food in a sense that such must be free from substances potentially harmful to those who produce and consume it. Breastfeeding is an essential component of health and sustainable diets."*

3. In consideration of the policy areas identified in Chapter 3 and the enabling factors suggested in paragraph 41 of the Zero Draft, what policy entry points should be covered in Chapter 3, taking into account the need to foster policy coherence and address policy fragmentation?

- The policy entry points should make reference to the requirements to food systems to contribute to health and wellbeing, to planetary health/sustainability and to social equity.
- "Governance" needs to be added as an essential pillar of food systems and entry point. In chapter 1, reference is made to the different policy fields relevant for a transformation of food systems towards healthy, sustainable and socially just diets as well as to policy fragmentation and policy incoherence. However, tensions and contradictions in food systems (e.g. between agricultural practices, trade rules and nutrition) should be spelled out. Only then could policy entry points and decisions that need to be taken be identified.
- Another dimension left out in Chapter 3 is "culture". The production, sharing, consumption of food is deeply rooted in culture and collective processes are crucial for the transformation of food systems.

4. Can you provide specific examples of new policies, interventions, initiatives, alliances and institutional arrangements which should be considered, as well as challenges, constraints, and trade-



offs relevant to the three constituent elements of food systems presented in Chapter 3? In your view, what would the “ideal” food system look like, and what targets/metrics can help guide policy-making?

- The “ideal” food system is a food system that promotes people’s health and well-being, preserves and contributes to the regeneration of nature and biodiversity, is socially and economically just, appreciates and builds on diversity of cultures and knowledge systems, and contributes to the progressive realization of the RtF and related human rights.
- With regard to targets and metric that should guide policy-making, the Guidelines should recommend to acknowledge the externalities of our food systems or ‘real costs’ of our food. They should suggest a holistic set of new indicators for healthy, sustainable, and socially just food systems. This includes moving away from yield/hectare and productivity/worker and income as main indicators for food systems towards their contribution to nutrient production and availability, resource efficiency, ecosystem services, resilient livelihoods and social equity. Reports such as [“The Economics of Ecosystems and Biodiversity \(TEEB\) \(2018\). Measuring what matters in agriculture and food systems”](#), and the [reports by IPES food](#) provide guidance on new indicators.

4. How would these Voluntary Guidelines be most useful for different stakeholders, especially at national and regional levels, once endorsed by CFS?

- The guidelines should show pathways on how they can be put into practice.
- The Guidelines should suggest clear mechanisms for monitoring its implementation and accountability a) at country level and b) at international level.
- Implementation and monitoring of the guidelines should put people at the center, particularly those most vulnerable to food and nutrition insecurity. The effectiveness of food system transformations need to be assessed in positive changes for these populations and planetary health.
- As part of the monitoring and accountability mechanism, the guideline should recommend the realization of human rights assessment of policies prior to its implementation and to measure their impacts.
- The guidelines should clearly distinguish between different actors and their roles and responsibilities. States have the primary responsibility for implementing the Guidelines and leading the transition towards healthy and sustainable food systems. States should put in place the necessary frameworks to facilitate meaningful participation of rights holders (particularly those groups most affected by hunger and malnutrition) in defining the priorities of public policies regarding food systems transformation.
- In this regard, the Guidelines should recommend the adoption of robust safeguards against conflict of interest to ensure that public policies serve the public interests of health and sustainable future and are oriented towards the fulfillment of human rights.
- The Guidelines should clearly stipulate policy incoherences and blockages in the process of transformation towards healthy and sustainable food systems. They should contribute to a better understanding on who potential winners and losers from policy changes are.
- Measures to strengthen cross-sectoral collaboration and policy coherence should be suggested. Examples should be provided for a systemic approach to the transition of food systems (e.g. information and education campaigns need to be assisted by changes in policies, regulations, standards to achieve sustainable change).