

Civil Society's Comments on the Foresight Paper for the Mid-Term Review process

Civil Society Nutrition Group's inputs for the Foresight Paper on the Mid-Term Review process conveys the collective efforts by different groups/alliances of civil society organizations and social movements that have actively engaged in the preparatory process for the Second International Conference on Nutrition (ICN2) and continue to advance its follow-up and the development of the Decade of Action on Nutrition (DoA). Members of these groups and alliances overlap and cross-fertilize to ensure increased coordination of efforts and the continued sharing of knowledge and experiences.

In its Manifesto¹, the Civil Society (CS) Nutrition Group expressed its vision and key expectations for the Decade. Six years later and half-way through the Decade, the Group would like to emphasize that, so far, the Decade has failed to keep the centrality on the realisation of the right to adequate food for all, and must strive to do so in the remaining years within the broader framework of human rights as indivisible, interdependent and inalienable. In this sense, the Sustainable Development Goals (SDGs) and Agenda 2030 cannot take precedence over other international law references, in particular the UN Declaration of Human Rights and the Convention on ESCR. Only this will ultimately contribute to making the DoA relevant even after 2030. The root causes of hunger and malnutrition in all its forms need to be addressed by going beyond traditional fragmented actions, reaffirming the interrelatedness and indivisibility of human rights, such as the right to food and nutrition, the right to health, the right to water and sanitation, women's and children's human rights, decent work, as well as the right to the access to and control over land and natural resources.

The world is confronted with a health, food and ecological crisis of inestimable proportions that imposes its heaviest toll on the marginalized and most vulnerable, and which has been exacerbated by the COVID-19 pandemic. The pandemic has also dramatically exposed the structural inequalities that shape unhealthy, unaffordable and unsustainable food systems, not only within countries but also across them. The pandemic has exposed the fragility and inadequacy of global value chains in addressing the already-increasing numbers of malnutrition in all forms and the ecological crisis and has magnified the urgent need for locally rooted food systems. Time is of essence, and the DoA, must therefore step in with a commensurate plan of action to address systematic failures within food systems, drastically exposed during the pandemic.

A food systems approach exposes the systemic interconnections between health, food, environment, culture and social relations. Nutrition, therefore, does not stand on its own but is deeply grounded in its social determinants. With this understanding comes the concept of sustainable healthy diets² as pivotal to underpin the systemic interconnections that exist between the individual level, the collective and the ecosystem level. Advancing the agenda on sustainable healthy diets is essential to ensure the public interest of food by recognizing that human health is indivisible from the sound ecological foundations for a healthy planet. However, we are witnessing an asynchrony between the public discourse, which has already recognized the crucial role of sustainable healthy diets, and the normative decisions being made even within the DoA so far. In particular, due to the political economies at stake in decision-making processes, there is a profound gap where no provisions are made for sustainable healthy diets. The normative processes' failure to incorporate this concept is often reflected and accompanied by the strong orientation to maintain the status quo in defending economic interests of the industrialized food system and its global value-chains. We, however, believe that the DoA has now the potential of becoming a central space to, not only advance the discussions on **sustainable healthy diets as a guiding principle for all Action Areas**, rather than referring to "healthy diets, sustainably delivered" as the Foresight Paper does at the moment. The Mid-Term

¹ [Civil Society "Manifesto" on Decade of Action on Nutrition](#)

² FAO and WHO. 2019. *Sustainable healthy diets – Guiding principles*. Rome. <http://www.fao.org/3/ca6640en/ca6640en.pdf>

Review as an opportunity to reflect on the multiple dimensions of hunger and malnutrition, must therefore take this urgent need into account to ensure all different Areas focus on such a systemic approach.

Comments on the proposed Action Areas of the Foresight Paper

Action Area 1. Sustainable, resilient food systems for healthy diets

The COVID-19 pandemic has also shown that diet is also linked to worse health outcomes of COVID-19 given that diet-related non-communicable diseases (NCDs) increase the probability of severe COVID-19 outcomes. There are also emerging links between overweight and obesity and worse health outcomes of COVID-19. Unless healthy, affordable and sustainable foods for sustainable healthy diets are prioritised, poor diets risk amplifying the pandemic and those at risk. This is an area that needs to be more sufficiently addressed in the Foresight paper.

The CS Nutrition Group appreciates the step taken to recognize agroecology within the area of resilient food systems. Under a food systems approach, sustainable healthy diets directly imply that agroecology, grounded in human rights, is the true pathway to transform our food systems if any significant progress is to be made in nutrition. The pandemic has put further stress on already fragile food systems, while those food systems rooted in agroecology have proven to be resilient while addressing dimensions from health to livelihoods, from ecology to cultural heritage, from society to knowledge systems. Action Area 1 still demonstrates a gap in terms of (1) bridging food systems as the key framework for an adequate nutrition for all, (2) recognizing agroecology as pivotal for such a framework and for sustainable healthy diets.

Agroecology re-grounds food in nature – as opposed to pushing highly processed and fortified food products to artificially improve their nutritional values - is of paramount importance for people's health and well-being while at the same time ensuring a regenerative use of natural resources and ecosystems. From a nutrition perspective, agroecology is founded in biodiversity, and is therefore capable to provide diverse food with high nutritional value due to regenerated and rich soils (which are key objectives and consequences of agroecological practices that do not depend on chemical external inputs). Studies show that as the use of chemical fertilizers increases, the proportion of water in the food also increases decreasing the concentration of nutrients (Raigón 2020), highlighting the need to move towards the elimination of dependence on chemical external inputs for food production for an adequate nutrition. This is just one of many examples proving how agroecology is a true transformational pathway towards encompassing food, equity, human and planetary health. As CS we had already expressed in Pillar 3 of our CS' Manifesto the need to move towards sovereign local food systems based on biodiversity, as the latter constitutes the foundation of a healthy and diversified diet that responds to a biological and social co-evolution of natural and cultural processes. **We, therefore, call once again for the remaining years of the Decade to strengthen agroecology in its overall programme of work and coordination with the national contexts.**

In addition, further recognition needs to be given to the need for natural resources to be managed at the community level, through ensuring the right to access and control over land and other natural resources. In this sense, territorial markets become fundamental as they are the ones who can re-connect consumers with local producers who can decide how, when and what food to produce. Local small-scale food producers ensure that seasonal and fresh food is produced and distributed accordingly to the local socio-cultural and environmental context, while consumers participate in such production through the act of preparing such food to feed themselves, their families and communities hence promoting further production by those small-scale food producers. **Synergic social, economic**

and cultural links of co-production are therefore established between consumers and producers within territorial markets, ensuring human and planetary health.

While these elements need to be strengthened within Action Area 1, further articulation is needed between Action Areas 1 and 4, to ensure that investment is re-directed to agroecology and local markets, while underpinning the negative impacts that global trade has on such models.

Action Area 2. Aligned health systems providing universal coverage of essential nutrition actions

COVID-19 has highlighted the crucial role of national public health systems and Universal Health Coverage (UHC) plans. Healthy systems should strive to be public and universal while importantly ensuring the right to adequate access to water and sanitation.

However, we believe that the Foresight paper places Health Systems as another distinct space for nutrition interventions, rather than building linkages from the food perspective as being the primary source of well-being. In this sense, acknowledging that food is one of the main determinants of human health also draws attention upon the interdependency of human and planetary health. Good and adequate health and nutrition must go beyond mere medicalized interventions, as food goes well beyond that. Daily eating practices, including the social and cultural aspects of it, need to be considered as the ones also determining our health and well-being. It is therefore crucial to move beyond a medicalized understanding of health and nutrition to a social, holistic and lifecycle approach that considers the varied and diverse connections of it with income distribution, food insecurity, poverty, marginalization, dignity, preventable ill-health and ultimately population wellbeing.

Nutrition programmes “delivered” through health systems alone will not be sufficient and are ultimately the result of a linear vision which does not encompass the need to address hunger and malnutrition from a food systems approach. Longer term solutions are needed to ensure the resilience of food systems in being able to fulfil the right to adequate food for all, in particular the ones highlighted in our comments for Action Area 1. Public measures to protect and promote nutrition and health must be grounded in and contribute to the realization of all human rights, in particular the right to water and the right to health, in recognition of their indivisibility and interrelatedness. Based on the emerging evidence, governments should ensure obesity as well as other diet-related NCDs are recognised and integrated in their nutrition responses, alongside work to tackle potential spikes in undernutrition and risk of famines.

Furthermore, measures to promote health and well-being need to be sensitive and adjusted not only to specific phases of life but also to the circumstances and needs of particular population groups (life-cycle approach). Participation of these groups is crucial in the analysis of the challenges they face, and the identification of measures required for addressing. Measures adopted to enhance the nutritional and health status of people need to be respectful of identities and foster autonomy and self-determination. The foresight paper must particularly articulate this understanding with Action Area 5, in particular for reasserting that sustainable healthy diets start with exclusive breastfeeding for the first six months and with the complementary foods until two years and beyond.

Governments must adopt systemic and multi-sectoral approaches to addressing the underlying causes of malnutrition in all its forms, including undernutrition, overweight and obesity, and the profound social, environmental, economic and political determinants of this situation, so that existing product-based approaches (e.g., vitamin capsules, ready-to-use therapeutic foods) are limited and exclusively targeted to emergency situations and those who actually require such treatment, and are implemented in full coherence with broader holistic human rights-based approaches. This needs to be emphasized for the coming years.

In emergencies of acute malnutrition must be addressed through a twin-track approach, by ensuring availability and access to treatment of severe acute malnutrition, but also by establishing proper systemic frameworks that ensure the realization of people's right to accessible, affordable, adequate and healthy food and nutrition and related rights.

Last but not least, the Foresight Paper severely lacks references to Antimicrobial Resistance (AMR) and the One Health approach, both cutting across Action Areas 1 and 2. **AMR needs to be urgently recognized as an emerging pandemic, therefore, requiring an ambitious agenda for a systemic response to tackle its multidimensional sources of emergencies.** Primarily, AMR responses should consist of stringent regulations in food production, starting with the phase-out of routine antibiotic use in livestock for prevention or treatment of disease outbreaks and for growth promotion. Such regulations should be accompanied by the recognition of the shortcomings of industrial and intensive livestock, as (1) critical driver for the increase of antibiotic use³ and as (2) contributor rise in the spread of resistant bacteria⁴, through food derived directly from intensive livestock, but also through soil, water, and crops (due to their irrigation with contaminated water). Finally, guidance must focus on the importance to protect ecosystems as biodiversity provides resilience which helps limit the spread of disease. Ecosystems are likely to suffer further damage if the global expansion of intensive livestock farming and agriculture continues.

Action Area 3. Social protection and nutrition education

It is of utmost importance to move beyond the concept of nutrition-sensitive approaches. Social protection plans and education must instead be key instruments to build the autonomy and self-determination of people, by enabling the access to affordable, healthy and adequate food for all. Social protection policies should take up nutrition as the space of convergence for multiple public objectives (health, social, environmental, economic) to support the transition towards resilient and sustainable food systems. Rather than looking at nutrition from the linear perspective of "problem-solution" to address malnutrition in all its forms, social protection should look into enabling food systems with cross-sectorial approaches to be the ones to truly address malnutrition in all forms.

We appreciate the mention of schools as platforms for food and nutrition education. However, these must not fall into the traditional top-down approach of education but look into a curricula reform which encompasses experiential learning (reconnecting children with local food markets and local small-scale food producers, school gardening, culinary education to promote traditional and local knowledge and culinary cultures,...). This reform should be framed under a deconstruction of cultural norms, emphasizing that men and boys have a great responsibility in the re-distribution of care work, which today unequally burdens women and girls. This is of importance to address the gender inequalities in terms of hunger and malnutrition while putting care work at the centre of our food and health, while building the agency of the youth to guarantee their ability of choice towards sustainable healthy diets.

Public procurement policies to promote sourcing of day-care and school food from local agroecological small-scale producers should accompany the curricula reforms in order to strengthen the nutrition education exposed above. This Action Area goes hand in hand with Action Area 5, as healthy food environments must be promoted within schools by restricting the offer and marketing of ultra-processed products in and around day-care centres and schools.

³ Use of antibiotics for livestock growth promotion is primarily due to suboptimum growth caused by unsanitary conditions

⁴ Due to the high concentration of animals and unsanitary conditions

The importance of traditional knowledge and of local territorial markets is not sufficiently emphasized as this is essential in considering local solutions for both social protection programmes and food education.

Action Area 4. Trade and investment for improved nutrition

We acknowledge the intentions of having a balanced approach towards trade. However, the emphasis ought to be placed in local markets not only as the drivers for sustainable healthy diets, but also as central to resilient and sustainable food systems. In this sense, guidance on how trade policies and international markets mechanisms ought not to undermine local and territorial markets (rather than “complement investments in domestic agriculture and safety nets” as stated in the Foresight Paper) must be given.

Emphasis is further needed on designing investments and regulations to support local and territorial markets. In line with our comments for Action Area 1, these markets are an important component of resilient food systems, and more in particular agroecology. Policy instruments that promote local and territorial markets have to be prioritized accordingly, such as for example:

- More investment in infrastructure for local and territorial markets, such as roads, public spaces to host these markets
- Adapting food safety regulations for them to be suitable for agroecological small-scale producers and cooperatives and that address the actual risks of short-circuit chains

Action Area 5. Safe and supportive environments for nutrition at all ages

We believe that this Action Area is merely focused on a certain context, namely the urban one, while the gap existing within the rural-urban interface is not and must be addressed. Small-scale food producers ought to be fully supported to shape healthy and sustainable environments where production is not possible. Measures to promote and guarantee adequacy, access, availability and affordability of foods and diets which are unprocessed and/or minimally processed through policy, investment and subsidies.

In this sense, COVID-19 has exposed the crucial and essential role played by small-scale food producers and agricultural workers in the provision of healthy and fresh food. More focus must be placed on these groups as they are key to the transition towards more resilient and sustainable food systems that will be able to comprehensively address malnutrition in all its forms.

As mentioned in Action Area 3, this needs to go hand in hand with measures that discourage the production, marketing and consumption of ultra- and highly processed products, through regulations and fiscal policies. The pandemic and its related lockdown measures have resulted in worsened impacts on food adequacy with the increased promotion of ultra-processed food.

Ultra-processed products are rich in fat, sugar, and salt, and depleted in dietary fibre and various micronutrients and other bioactive compounds. They are often high in saturated fats and/or trans-fats. Further, the safety of various specific additives, and classes or combinations of additives used in their formulation, is unknown or disputed. Their ingredients and formulation make all of them hyper-palatable and some habit-forming and even quasi-addictive.

Ultra-processed products (UPP) including breastmilk substitutes, are rapidly displacing breast feeding and unprocessed or minimally processed foods and freshly prepared dishes and meals made from these foods. They have a huge impact on the quality of diets and are a key factor in the rise in

overweight and obesity and related non-communicable diseases such as diabetes, cardiovascular diseases and cancer, as well as premature death resulting from such. Given the detrimental impacts of UPEP on people's health the DoA must focus on the level of processing of food as a long-term strategy for nutrition, rather than the reformulation of food products (which does not address the centre of the problem), and give guidance on measures that discourage the production, marketing and consumption of such products through policy, price, and other interventions. These ought to be combined with measures to promote and guarantee access, availability and affordability of unprocessed and minimally processed foods (real food) and diets based on such through policy, investment and subsidies. More concretely, they should:

- Curb direct and indirect subsidies for sugar, salt, trans-fat rich foods and additives; redirect these subsidies to agro-biodiverse local food production (see section 5);
- Introduce tariffs on imported UPP and beverages that contain high levels of sugar or other sweeteners;
- Restrict food and beverage marketing targeted or attractive to children and adolescents (under the age of 18), including the prohibition of the use of all marketing tools (freebies, contests, use of celebrities and cartoon characters, etc.) in all media channels, (including internet, social networks, in schools and marketing on the product package);
- Mandate interpretive front package labelling that warns consumers of the levels of critical nutrients in their foods (added sugars, salts and saturated fats), utilizing an evidence-based nutrient profiling system;
- Implement a minimum 20% tax on sugar-sweetened beverages and on HSSF foods and utilize tax revenue for programs to prevent all forms of malnutrition and/or to subsidize unprocessed and minimally processed foods;
- Promote healthy food environments and restrict the offer of ultra- processed foods and beverages in and around daycare and schools, as well as in health and community centers, and promote sourcing of daycare and school food from local agroecological small-scale producers.
- Develop public procurement policies to promote those public institutions (daycares, schools, hospitals and prisons) receive local, healthy foods from small-scale food producers (this is also a measure to promote such production models and the rights of peasants).

As mentioned in our comments in Action Area 2, supportive environments for nutrition at all ages should protect, promote and support breastfeeding, through implementation of the Global Strategy for Infant and Young Child Feeding, for the first six months and continued breastfeeding until two years and beyond along with appropriate complementary food after six months of age. The DoA must consider taking serious efforts to integrate the International Code of Marketing of Breastmilk Substitutes and subsequent resolutions into intergovernmental discussions at the global level and revert any attempt to undermine these international instruments (as was evidenced in the final outcome of the CFS Voluntary Guidelines for Food Systems and Nutrition). The DoA must also advance efforts to integrate the Code into national legislation and monitor its implementation. Breastfeeding policies should be accompanied by ensuring paid maternity and paternity leave as well as nursing rooms in public spaces and offices as well as time for nursing/pumping during work hours.

We would like to raise our concerns regarding food fortification as it may interfere with strategies based on the promotion of diversified, small-scale food producers-based food systems and diets. Food fortification measures often contribute to an overreliance on a few staple crops and processed foods (leading to a narrowing of diets) and, therefore, promote the industrial food system. Policies should thus avoid resorting to such measures, especially in light of viable alternatives based on the diversification of local food systems and diets, also as longer term strategies.

Finally, the mention of the Committee on World Food Security is not fully comprehensible within this Action Area. We consider it would be best to move it to Action Area 6, to have a better framing on governance and key intergovernmental mechanisms already in place at global level.

Action Area 6. Strengthened governance and accountability for nutrition

The Civil Society's Manifesto for the Decade of Action on Nutrition included "Democratic governance and global regulatory framework" as one of its four main pillars. This crucial pillar is in line with a call for putting public interest at the heart of food systems and while addressing malnutrition in all forms in all its forms. An alignment with the progressive realization of the right to adequate food thus remains central with the indivisibility of all human rights. In this sense, we believe that the Action Area 6 of the Foresight Paper must be strengthened when addressing the role of private sector. Adequate and robust safeguards must be put in place to protect the public policy space from undue influence by powerful economic actors and avoid conflicts of interests. Furthermore, a central pillar of nutrition and food governance must be the regulation of private corporations to mitigate conflict of interest and prevent their actions from negatively impacting on nutrition policy development processes and human rights more broadly.

On the other hand, when talking about nutrition networks and the need for further representation from some sectors, we believe that the effective participation of rights-holders, in particular groups most affected by hunger and malnutrition in all its forms, in the elaboration, implementation, and monitoring of policies that concern them is key. In this sense, we believe that the Committee on World Food Security provides a benchmark of a participatory, inclusive and intergovernmental platform for food security and nutrition decision-making.

As Civil Society, we have provided a collective report (CS ICN2 Group, SUN and ICAN) of our engagement with the Decade of Action on Nutrition⁵ and are committed to continue engaging to ensure the participation of the groups most affected by hunger and malnutrition in all its forms in the second half of the Decade for Action on Nutrition.

⁵ United Nations. 2020. *Implementation of the United Nations Decade of Action on Nutrition (2016–2025)*. Report of the Secretary-General. New York. (also available at <https://digitallibrary.un.org/record/3857038?ln=en>)