



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

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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?

Chapter 1 provides a comprehensive overview on the situation. However, among the causes of malnutrition **the reference to the root causes is still missing: poverty and inequalities**. It is a rather complex issue and would require a holistic approach and would also necessitate structural changes in our current food systems.

One of the basic problems with our food system is the misconception of low food price policy. The impacts of low food prices on the consumers' behaviour are significant, including their buying preferences. The situation of “low food prices” appears to be the result of competition among retailers and as such they seem to be positive and useful, favouring the poor people. In reality, all people, including the poor, suffer the consequences of this low food price policy, because low food prices regularly linked to low quality of food. These low quality, ultra-processed food (frequently with high fat, sugar and salt content, the so-called junk food) have serious consequences on the nutrition status of the poor populations, many times leading to obesity and overweight. Food prices are frequently kept artificially low; they do not reflect the real costs of production, ignoring the positive and negative impacts (externalities) of the various food systems on the environment and on the human health.

For the decisions to transform our current food systems, true cost accounting is essential, giving due consideration to all environmental and human health externalities. This could help shape the Voluntary Guidelines, recommend appropriate measures, policy incentives in support of sustainable solutions. There are ample scientific evidences related to the true costs of food and there are several studies available on this topic, for example <http://www.fao.org/family-farming/detail/en/c/436356/>; or <http://teebweb.org/agrifood/measuring-what-matters-in-agriculture-and-food-systems/>.

In addition, artificially distorted, low food prices have a strong impact on the food waste as well. If food is cheap, it conveys the message that it does not represent a real value. Therefore, consumers will care much less about it, they are throwing away food more easily. Higher food prices (reflecting the true costs of food) would discourage consumers to buy more than they effectively need. Realistic prices (reflecting the true costs) of food do not imply generally high food prices. Only the prices of those (ultraprocessed, junk) food would go up which do not internalize the environmental and public health externalities. Studies show that as a result of true cost accounting, prices of locally produced, fresh, healthy, unprocessed (whole) food would become more competitive. For the benefit of those who produce them, and in particular, the consumers and the whole society. Obviously, there would be the need for measures to provide decent wages as well, but these are necessary anyway to combat extreme poverty. In addition, the costs of these measures are much lower than the benefits of saving great amounts of public health care expenditure.

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?

Guiding principle a) Systemic and holistic and evidence-based approach. This is essential and it should include scientific evidence of true cost accounting. Respecting the principles of sustainability is indispensable, paying due attention to the (so far neglected) environmental and social dimensions. Obviously, the economic dimension should also be considered. However, it should be kept in mind that **economic sustainability is nothing else but the result of the national and international "economic environment", in particular the financial policy incentives or subsidies**, promoting one or another type of food systems. In this regard, national legislators have enormous responsibility in providing the appropriate policy incentives to those food systems which are really sustainable.

Guiding principle b) Coherent and context-specific policies. Appropriate policies should include targeted measures to create an enabling economic environment for all stakeholders, with positive and negative financial incentives. These measures should be based on the above mentioned scientific evidence of true cost accounting and should address the power imbalances along the food supply chain.

Guiding principle e) Nutrition knowledge and awareness. This should include nutrition education starting with the youngest children at school.

Guiding principle f) Realization of the Right to Food. Reference to the root causes of hunger and malnutrition is missing: poverty and inequalities. Realization of the Right to Food is possible only if poverty and inequalities are adequately addressed.

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 Chapter dedicated to shaping the Voluntary Guidelines, in particular paragraph 41 rightly provides a list of the cross-cutting factors and specific operational fields. As agreed earlier, the objective is to provide recommendations applicable and usable in practice, providing real help to Member States in their efforts to improve the nutritional status of their population. Therefore, it is important that **policy decisions to provide incentives to transform our current food systems, improve nutrition and enable healthy diets, should be based on scientific evidence. In this regard, it is indispensable to apply the true cost accounting concept**, giving due consideration to all environmental and human health externalities. See more reference above, under Section 1.

It appears evident again the lack of reference (in paragraph 43.) to the root causes of malnutrition: poverty and inequalities. In this regard, the first sentence of this paragraph should refer to economic affordability, in addition to food availability.

Several times in the document, including in sub-paragraph h) food fortification is mentioned. **Fortification can constitute a short/middle term solution against micronutrient or other deficiencies but should not be presented in the Voluntary Guidelines as a global solution for nutritious, healthy diet and sustainable food systems.** Fortification has an important role in emergency situation, but it should be considered only as a temporary solution in specific, fragile contexts and not as a final goal. The real, longer

term solution should be the consumption of diverse, locally produced, nutritious food for a healthier diet, benefitting also the local communities who produce these food products. These products contain all nutrients, minerals, vitamins for a healthy diet; therefore, on the longer run there is no need for fortification. This should be made clear while shaping the Voluntary Guidelines.

In the same paragraph 43, a whole sub-paragraph (i) is dedicated to Climate change adaptation and mitigation. This area is extremely important but adaptation and mitigation measures alone are able to provide solutions only to some of the overall problems. **It is the concept of sustainability that fully includes the climate change adaptation and mitigation concerns and goes well beyond**, provides adequate responses to a number of other environmental challenges (biodiversity loss, soil degradation) and to social issues as well, like rural employment.

In **sub-paragraph j) Antimicrobial resistance** it would be appropriate to specify and add at the end of the sub-paragraph the need for **phasing out of use of antibiotics for animal growth promotion**.

In paragraph 44 sub-paragraph a) Food losses and waste: This paragraph should be complemented. The **main drivers of Food losses and waste (including low food prices and the policies of retail chains) are to be identified** and appropriate measures **should be** recommended.

Paragraph 46 refers to local markets. The Voluntary Guidelines should explicitly recommend establishment and promotion of local farmers' markets. Short supply chains have a number of advantages like the supply of fresh, diverse food for a healthy diet to consumers. This paragraph also refers to the challenge of lower prices in supermarkets. The situation of "low food prices" is rather complex and therefore should be elaborated in more details. For further references, see above my responses related to low food prices, under section 1.

Under a) and b) of paragraph 46 the issue of true cost accounting could provide relevant inputs for the Voluntary Guidelines. Regarding food products high in fat, sugar and salt, the Voluntary Guidelines should recommend serious restrictions on the advertising and marketing.

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

The Voluntary Guidelines would be useful for governments and parliaments preparing/adopting appropriate legislation. It would be important to follow these guidelines by the other stakeholders (private sector, civil society, etc.) as well.

FAO has a crucial role to give due consideration to these Voluntary Guidelines while providing policy advice to countries. (This would be important for all the other, previous CFS policy recommendations, guidelines and principles...)