



GLOBAL DAIRY PLATFORM

Global Dairy Platform, comments to Committee on World Food Security High Level Panel of Experts report on Nutrition and food systems Draft V0

General comments:

Thank you for this opportunity to provide comments to the recently released CFS-HLPE Draft V0, *Nutrition and food systems*. GDP would like to commend the HLPE project team for tackling such an important issue and for the content of the report which is a good starting point.

Understanding the complexity of food systems and the role they play in nutritional security will be one of the defining issues of our time. GDP believes that everyone should have access to safe, healthy, affordable, tasty food that is respectful of tradition, the environment, animals and the farming families that produce it.

To deliver nutritious, healthy food, the food system needs to be cognizant of issues from both a supply and demand perspective. As such the system needs to consider a vast array of interconnected issues and trade-offs while taking into account areas where there is a lack of, or conflicting, scientific evidence. The study of food systems by its very nature needs to be inter-disciplinary and those engaged need to be aware of the potential for the unintended consequences of implementing change in one dimension without full consideration of the follow on effects in other parts of the system.

Policy makers and regulators need to temper the desire for action with the need for understanding of such consequences. The “best available” evidence is at times inadequate and we caution the CFS about drawing recommendations when such inadequacies are, or should be, evident.

Our understanding is that the aim of the HLPE process is to improve the robustness of policy making by providing independent, evidence-based analysis and advice at the request of CFS. With that aim in mind, we would draw attention to what appears to be ideology/opinion which is evident in areas throughout the report.

For example,

- Page 9 starting on line 43;

When discussing pathways forward for emerging countries: “They do not have to follow the long and damaging path that many high-income countries have taken, involving the creation of food systems that maximize profits without an adequate focus on the nutrition consequences.”

An alternative view is that food systems respond to stimulus created by regulatory environments, for example food products that were formulated in response to requirements for low-fat or fat-free regulations.



- Page 9, starting at line 31
“Global food systems, from industrial scale production through excessive consumption and waste, are not sustainable...”

There is no similar comment or analysis of the environmental impact of inefficient small-scale farming, with high carbon footprints for individual foods.

We encourage the HLPE to take care to consider the unintended consequences of any recommendations that are made.

The current report is missing some crucial sections; including:

- Typology of food systems
- Conflicts of interest
- Recommendations

Therefore, we request that a second round of consultation be held to allow for comments on the complete report once these sections are completed.

Comments on some of the specific questions raised in the covering letter

Question:

1. *The purpose of this report is to analyse the ways in which food systems influence dietary patterns and hence nutritional outcomes. The objective is to focus on consumers and consider sustainability issues. The report aims to be solution oriented and to highlight efficient policies and programs. Are those major objective(s) clearly reflected in the V0 draft?*

Response:

GDP expected that this report would focus on the study of nutrition taken from the perspective of the *food system* and that this perspective would distinguish this report from others recently produced. However the draft report does not meet that expectation.

With respect to emphasizing solutions, with the exception of some areas in Section 4, the majority of the report is descriptive in nature and does not contain recommended solutions. We expect that as the next version of the report forms there will be more emphasis on the solution aspects and therefore we would like to reiterate our request for a second round of consultation so that we are able to provide comment to the solutions being considered.

2. *Do you think that the overall structure of the draft is comprehensive enough, and adequately considered and articulated? Does the draft strike the right balance of coverage across the various chapters? Are there important aspects that are missing? Does the report correctly focus on the links between nutrition and food systems without straying beyond that?*

Response:



The report covers a lot of ground on the topic of nutrition, but does not really address the complex topic of food systems.

Food Systems incorporate supply and demand by integrating food production, processing and distribution with food consumption, disposal and waste. The topic is extremely rich and challenging. Few scientific studies have crossed disciplines and attempted to complete a systems perspective looking at the cause and effect of changes in different parts of the system. Unfortunately the recognition of these challenges and acknowledgement of the lack of scientific evidence is missing in this draft of the report – what happens when we make changes to recommended dietary patterns? To food supply dynamics? To health? To the environment? To the economic well-being of farming families? To agricultural and ecosystem resilience? To rural communities? Little of this is discussed in the current draft of the report.

3. *Does the conceptual framework need to be edited? Simplified? Should “the food environment” as defined in the draft be central to the framework?*

Response:

We believe that the report adequately addresses issues of nutrition, however these issues are already well covered in reports such as the Global Nutrition Report. Perhaps reference to existing reports on nutrition would allow for a more succinct final report.

With respect to the treatment of *food systems*, we find the emphasis in the conceptual framework on “the food environment” has tended to narrow the definition of food systems in a way that reduces the apparent importance of the production issues. Despite the earlier definition on Page 11, the report itself then adopts a narrow view of these production related food systems issues with a primary focus on environmental aspects, and does not adequately address production issues from either a social or economic dimension.

For example;

Page 9, starting line 46;

“To be sustainable, food system policy choices have to focus on the environmental as well as nutritional consequences. Different foods require different amounts of energy, water and fertilizers to grow, harvest, process, store, transport, trade, market and retail. Their value chains also generate different levels of greenhouse gas (GHG) emissions. As far as the evidence allows, decision-makers need to know the nutrition and environment consequences of the food system decisions they take.”

Page 10 starting line 21;

“In addition, the UN decade of Action for Nutrition, launched in April 2016, is heavily focused on food systems and a plethora of reports from a wide range of bodies has made the case for food systems that are more nutrition focused and environment friendly.”

However, even in environmental areas the report tends to focus on a limited range of criteria. The FAO definition of sustainable diets stressed the need to protect and respect ecosystems and biodiversity while optimizing human and natural resources. Environmental factors represented only one of the four domains which need to be considered.



Comment of Figure 1, in addition to the emphasis of consumption over production, some relationships in figure 1 are not clear, in particular the diagram seems to indicate that diets are the cause of environmental impacts, in fact we would suggest that the issues of food production and diets are much more complexly linked than would appear in the figure.

4. *Are production systems and their role in shaping diets and nutritional outcomes adequately addressed?*

Response:

As mentioned elsewhere, GDP believes that the report is more concerned with issues of consumption and does not provide a balanced perspective on the role of food production and the attendant socio-economic issues.

5. *Does this draft cover adequately the main controversies in the field of Nutrition and food systems? Are there any remaining gaps?*

Response:

The report does cover many of the controversies on specific nutrients such as sugar, sodium and fat. However we contend that the report should focus on diets/dietary patterns and the impacts on food systems. It should avoid focus on individual nutrients and terms such as healthy or unhealthy food should be avoided.

For example, there is a lack of consistency about how animal source foods are represented in the report in terms of the nutrients they provide. In section 3.1.3, authors note that adolescent girls have inadequate intakes of iron, zinc, calcium, vitamin D, folate, thiamin and riboflavin. However, red meat and processed meats, sources of iron and zinc, are identified as “unhealthy” foods in 3.1.1

We also note that the report provides a strong focus for systems that promote healthy food options with fruits and vegetables only. We feel that other food groups including whole grains and dairy also play an essential role and this should be highlighted in the report.

6. *The project team is working on a categorization of food systems. Are you aware of specific approaches of use in that perspective, and particularly of quantitative indicators that could be used?*

Response:

GDP would welcome the opportunity to understand and comment on this section of the report once it becomes available.

7. *Does the draft adequately show the multiplicity and complexity of diets and nutrition issues across different food systems and specific contexts with a good regional balance?*

8. *What areas of the document are in need of strengthening or shortening?*

Response:



Throughout the report data is given to support points, however the quality and/or certainty/uncertainty of the data is not made clear. Is the data strong, is there consensus on the point or is the available evidence weak, emerging or conflicting? Does the data cover all of the topic or is it limited in in scope? Is the data global, regional or local?

Additionally Chapter 4 of the draft lists a wide range of examples but many of them have not yet produced any tangible outcomes and as such should be removed from the report as they confuse and detract from the examples where data is evident.

9. *Chapter 4, Section 4.1 contains case studies/examples of effective policies and actions in different contexts/countries across the food system for diets and nutrition. Could you offer other practical, well-documented and significant examples to enrich the report and provide better balance to the variety of cases and the lessons learned, including the trade-offs or win-win outcomes in terms of addressing the different dimensions of diets for FSN?*

Response:

With respect to the specific case studies cited in the draft, GDP has the following observation:

- Page 85, Box 29 The public distribution system in India
One of the references cited, to illustrate the benefit of subsidies has a different conclusion than what is presented in Box 29.

From Chakrabarti 2016 (IFPRI): “Overall, we find no evidence that the consumer price subsidy in pulses introduced in different states resulted in improved nutrition in terms of household protein intake.” Further “Whereas the subsidies do appear to have affected pulse consumption in a statistically significant way, the size of the effect is not large enough to make much difference.”

https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2779302

10. *Section 4.2.2 on “Institutional Changes and Governance Across the Food System Movements for Nutrition” requires more work, and more inclusion of evidence and of the various players. Any inputs on this section are most welcome.*

Response:

GDP would welcome the opportunity to understand and comment on this section of the report once it becomes available.

Also in Section 4.2.2 are several examples of *Economic Drivers*, GDP would like to draw attention to the fact that interventions such as taxes and subsidies often do not result in the outcomes as desired by those planning the interventions.

There are few rigorous examples of successful health outcomes due to taxing unhealthy foods/ingredients or subsidizing healthy foods such as fruits or vegetables, and unforeseen and



unintended consequences can result. The tax-generated income is not always used for health purposes.

- A fat tax introduced in Denmark in 2011 had little impact on consumer purchase behavior and put an economic burden on the public. After 15 months the tax was abandoned. Economic effects were negative; the tax was blamed for rising inflation, Danes purchased cheaper brands or went across the border to shop. At least 10% of the revenues were used for administration costs along with an estimated 1300 jobs lost.
Source: IEA Current Controversies Paper No. 42. The Proof of the Pudding. Denmark's fat tax fiasco. By Christopher Snowden. May 2013.
- The Healthy Food program in South Africa, funded by a private health insurance company, provided discounts up to 25% for healthy food purchases. Despite improved dietary behaviors such as greater consumption of fruits/vegetables and whole grains, and reduced consumption of high sugar/salt foods, fried and fast foods, there was no evidence of health outcomes such as lower BMI or obesity prevention.
Source: Ruopeng An, MPP, MPhila,*, Deepak Patel, MD, MPhilb, Darren Segal, BSc, and Roland Sturm, PhD. Eating Better for Less: A National Discount Program for Healthy Food Purchases in South Africa. Am J Health Behav. 2013 January; 37(1): 56–61.
doi:10.5993/AJHB.37.1.6.

11. Is the report too technical or too simplistic? Are all the concepts clearly defined?

Response:

GDP would caution the HLPE from promoting a view that there is sufficient evidence to make decisions in all areas.

For example, Page 10 line 1:

- “As far as the evidence allows, decision-makers need to know the nutrition and environment consequences of the food systems decisions they take.”
GDP contends that insufficient evidence exists today in many cross functional areas of food systems and that rather than “educated guesses” the HLPE’s emphasis should be on identifying areas where there is a lack of evidence and promoting the need for research.

In addition there is a lack of consistency in terms and terminology throughout the report and this creates confusion when trying to make sense of some of the topics.

12. Are there any major omissions or gaps in the report? Are topics under-or over-represented in relation to their importance?

Response:

As covered elsewhere in our response, GDP would like to see a more complete analysis of the role of food systems balancing the issue of production with consumption. There is little or no attention given to the role of farmers, or the rural communities whose livelihoods depend on those farms.