Thank you for the invitation to add to the discussion on the Issues’ Note on Nutrition and Food Systems. I have the following comments for consideration by the HLPE in this report:

1. The large and very influential role of corporate concentration, commercial marketing and processed food development must be analyzed head on. There may in fact be unavoidable trade-offs between current systems and profits and improved nutrition (see note on Smith et al. 2013). The literature on these issues is extensive. See Hendrickson (2015); Howard (2016); Lang et al. (2009); Moss (2013); Nestle (2013); and Smith et al. (2013). The power of commercials and corporate influence (for instance, on what is served in schools) are obviously important influences on how diets change, yet is rarely addressed directly in many analyses and scenario projections.
   1. Smith et al.’s conclusions are of especial note, particularly with regards to profit and regulatory capture (albeit in a US context): “[…]We ask whether the current state of affairs represents a market failure, and—if so—what might be done about it. We argue that while today’s industrial food system has its advantages, the asymmetric information problems inherent to this system have resulted in a “lemons-style” breakdown in the market for processed foods. The appropriate policy response to such situations (namely, verifiable quality standards) is well known, but such policies are likely (in the short run) to reduce profits for existing large industrial producers of food. In light of the food industry’s long history of success at regulatory capture, we propose the formation of a new independent food standards agency devoted to protecting the interests of the American consumer.”
2. The fact of persistent and large negative externalities—particularly health externalities, both direct and indirect—must be taken into account when evaluating current and alternative food systems. It makes no sense, for example, to refer to current systems as “efficient” in the presence of large, uninternalized externalities. (FAO 2015; Pretty et al. 2001). Further, the possibility of raising food prices to send appropriate signals about the costs of different foods and production systems, while politically unpopular, should be considered. It is, in fact, one way that “diets change,” and the many projections of future demand for, for example, meat from ruminants appears to me to be economically and ecologically incoherent and untenable without envisioning the internalization of *known* costs and risks into prices. See also point 8 on possible effects of (higher) food prices.
3. The fact that, with few exceptions, plant breeding has not focused on nutrition, and there is some evidence of nutritional losses in cultivars over time, should be addressed. (e.g. Davis 2009)
4. As acknowledged in multiple sources, gender equality and women’s rights should be a central feature of the analysis on nutrition, e.g. Agarwal (2015); Bezner Kerr et al. (2007); Bezner Kerr et al. (2011); Bezner Kerr et al. (2013); Jones et al. (2014); Smith et al. (2003); and Smith and Haddad (2015); see also the FAO *Key recommendations for improving nutrition through agriculture and food systems,* which includes the point for programs and investments “Empower women” and the point for policies “Include measures that protect and empower the poor and women.”
5. The constraints placed on many countries with regards to providing food and nutrition security for their own populations must be addressed, and in fact, prioritized above simple economic returns and trade considerations for corporations—which was *not* done during the formation of the FAO, as McKeon (2014) elaborates. See also Weis (2007) for a discussion of the impacts of the Agreement on Agriculture.
6. The growing literature on connections between crop diversity and dietary diversity should be amply explored; e.g. Burlingame and Dernini (2012); with the contexts of food sovereignty and autonomy considered alongside.
7. The growing realization of the importance of dietary diversity *per se* should be addressed, e.g. Smith and Haddad 2015; Heady and Ecker (2013).
8. A sophisticated analysis of nutrition, production, productivity, and *prices* must be undertaken. While there has long been an assumption that increasing productivity for farmers will increase their well-being, nutrition, and income, the possibility that higher prices is equally or more important or effective is seldom seriously addressed. But contemporary analyses and re-analyses of earlier data have solidly (though arguably not yet conclusivelyl) shown that higher food prices may in fact be better for farmers, and indeed, may drive up urban and rural wages (and therefore improve the possibilities for food and nutrition security); Headey (2014); Ivanic and Will (2014). Therefore, the typical assumption of productivity 🡪 increased farmer income 🡪 lower food prices 🡪 improved nutrition outcomes should be interrogated, questioned, and likely revised in the face of current evidence.
9. The significant contribution to dietary diversity and food security from urban agriculture should be acknowledged and carefully examined; Thebo et al. 2014; Zezza and Tasciotti 2014.
10. Cultural and ethical values, and their interaction with nutrition, food sovereignty, and autonomy (not autarky) should also be explicitly considered and their significance allowed due weight. This includes, but is not limited to, the importance of participation and empowerment, as recognized in the *Key recommendations for improving nutrition through agriculture and food systems*, which is based on a consensus process among nutritionists and related experts.

Thank you again for the opportunity to submit comments towards this important work.

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