



## CFS VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION

### MATRIX WITH INPUTS PROVIDED BY CFS STAKEHOLDERS ON THE DRAFT FOR NEGOTIATIONS

The matrix below incorporates text proposals that were shared by CFS stakeholders on the draft for negotiations of the CFS Voluntary Guidelines on Food Systems for Nutrition (VGFSyN), negotiations on which are expected to commence later this year. The objective of this informal document is to help members of the Open-ended Working Group to have a clear picture of the various proposals of, and positions among, the membership concerning the document in view of the need to find compromise solutions during negotiations.

The large majority of member proposals have been included in tracked change format into the text itself, while asterisks are used in a number of cases to improve the readability of the matrix where it was not possible to integrate the proposal into the text itself. For example, asterisks were used in the following instances:

- a) When alternative text proposals for the entire paragraph (or large parts of it) were presented;
- b) When general suggestions/comments were provided, with no specific or concrete text proposals;
- c) In cases where new paragraphs were proposed or suggestions to move a paragraph to another section were made;
- d) In cases where text for an additional footnote was suggested;

Furthermore, in order to facilitate the work of OEWG members, brackets were inserted in the text in the following cases:

- a) Where different - and sometimes divergent - text proposals were proposed on the same point/sentence (brackets help understand the presence of alternative proposals);
- b) Where there is a proposal to delete a sentence (or part of it), and, at the same time, other stakeholders have suggested additional text on that sentence (in this case, the sentence includes the proposed amendments in tracked changes, while the sentence is bracketed to show that there is also a proposal to delete it).

Lastly, an annex to this matrix includes a number of comments submitted by the Civil Society Mechanism (CSM) that were not incorporated into the main body of the matrix due to their length.

Of course, all the paragraphs and proposals must be negotiated in the Open-Ended Working Group under the assumption that “nothing is agreed till everything is agreed. In this way”, the whole text should be seen as “in brackets.

PARAGRAPH	TEXT PROPOSAL	PROPONENT
TITLE	<b>CFS VOLUNTARY GUIDELINES ON <u>SUSTAINABLE</u> FOOD SYSTEMS [FOR] [AND] NUTRITION</b>  <i>*Request to keep original title: Voluntary Guidelines on Food Systems and Nutrition (CSM)</i>	Norway, Costa Rica, EU, CSM
<b>PART 1 - INTRODUCTION</b>		
<b>1.1 BACKGROUND AND RATIONALE</b>		
Para 1	<p><b>Malnutrition in all its forms</b> – undernutrition, micronutrient deficiencies, overweight, and obesity – is one of the major challenges that countries face and is a <u>potential</u> result of food insecurity <u>and inadequate diets</u> along with many other factors and causes. Malnutrition, in at least one of its forms, affects every country in the world and most countries are affected by multiple forms. The impacts of malnutrition have profound consequences on people’s health and wellbeing, physical and cognitive development, and livelihoods throughout their lifetime and across generations. Malnutrition is a <u>major impediment to key indicator of gaps in</u> the progressive realization of the right to adequate food in the context of national food security <u>and as well as</u> the implementation of the 2030 Agenda for Sustainable Development.</p> <p><i>* alternative text for the last sentence: “The progressive realization of the right to adequate food is a cornerstone in the combat against malnutrition in all its forms. Food security and nutrition are closely linked under Goal 2 of the 2030 Agenda for Sustainable Development “End hunger, achieve food security and improved nutrition and promote sustainable agriculture” (FAO)</i></p> <p><i>*request to replace “undernutrition” with wasting and chronic malnutrition” (USA)</i></p> <p><i>* request to mention economic impact of malnutrition (USA) – consider that this matter is already addressed in paragraph 5</i></p> <p><i>* request to add figures on hunger, and not to refer only to malnutrition (CSM) + suggested text with figures related to malnutrition (EU) - it was decided not to include any figure in the document that might be outdated in a year time</i></p>	FAO, EU, USA, CSM
Para 2	Malnutrition in all its forms is associated with various forms of ill health and increased mortality. <b>Undernutrition</b> is a major cause of death among children under the age of five years, <u>and a source of increased</u> <del>the</del> susceptibility to infectious diseases and risk of non-communicable diseases (NCDs) in adulthood. Wasting, also known as acute malnutrition, poses a significant risk of increased morbidity and mortality in children. Stunting, [also known as] [ <u>largely a result of</u> ] chronic malnutrition, is associated with delays in both physical growth and cognitive development. <u>Both stunting and wasting</u>	USA, EU, Norway, CSM

	<p>continue to represent significant challenges to achieve the 2030 goals and targets.</p> <p>* request to add figures on number of undernourished globally (Norway) - it was decided not to include any figure in the document that might be outdated in a year time</p> <p>* request to add reference to the impact on health of use of pesticides across food systems (CSM)</p>	
Para 3	<p><b>Micronutrient deficiencies</b> related to the inadequate intake of food rich in iron, vitamin A, iodine, folate, vitamin D, and zinc, <del>among and</del> other <u>essential nutrients</u>, affect a large proportion of the global population with serious consequences on health, well-being, and development. <u>Nutritional needs vary across the lifecycle.</u> Children under the age of five years, adolescent girls, women of childbearing age, and pregnant and lactating women <del>have specific nutritional requirements across their lifecycle and</del> are <u>particularly vulnerable to micronutrient deficiencies, including among others, susceptible to a higher risk of anaemia, in particular iron deficiency anaemia, which is one of the most prevalent micronutrient deficiencies in the world.</u> Also referred to as “hidden hunger,” micronutrient deficiencies increase a person’s vulnerability to infection, birth defects, impaired development, and lower life expectancy.</p> <p>* request to broaden the focus to other micronutrient deficiencies, rather than only iron-deficiency anaemia (Canada)</p> <p>*request for a holistic approach to consider that diverse diets composed of fresh, seasonal and unprocessed/minimally processed food should be the ones providing for the nutrients to live an healthy and active life (CSM)</p>	USA, WFP, WHO, FAO, Canada, CSM
Para 4	<p><b>Overweight and obesity</b> <del>paired with lack of physical activity</del> represent major <u>and increasing</u> risk factors globally for diet-related NCDs such as some forms of cancer, cardiovascular disease, <u>chronic respiratory diseases</u> and diabetes <u>type II.</u> <del>While undernutrition and micronutrient deficiencies are still the main forms of malnutrition among children under the age of five years globally, o</del>Overweight and obesity are increasingly prevalent among young and school-aged children, adolescents and adults, <u>and increasing in every region, with rural areas catching up to urban settings. In addition, as with undernutrition, optimum growth in the first 1,000 days is essential to the prevention of overweight; children who suffered from undernutrition are more susceptible to become overweight or obese later in life.</u></p> <p>*request to consider that obesity also affects children including under 5’s, school aged children and adolescents; especially those in low- and middle-income countries where the disease is rising fastest (CSM)</p>	EU, Norway, Switzerland, Russia, WFP, CSM
Para 5	<p>The heavy <u>health, social and economic impacts of malnutrition in all its forms</u> are transmitted across generations. <del>[Undernourished] [Malnourished]</del> mothers are more likely to have low-birth-weight babies <del>putting them who are</del> at an increased risk of becoming <del>[undernourished] [malnourished]</del> as children – <del>[and into adulthood]</del> - as well as overweight</p>	FAO, USA, WFP, Switzerland, EU, Russia, CSM

	<p><del>and-or</del> obese as adults. Maternal obesity poses short- and long-term risks for maternal and child health <u>and wellbeing</u> including poor cognition and increased risk of neurodevelopment disorders early in life, <del>as well as</del> <u>and</u> an increased susceptibility <u>to overweight in school-age children and to</u> obesity and NCDs in adult life. Malnutrition in children <u>may</u> results in reduced stature, diminished physical and mental health, <u>and</u> poor school performance <u>in childhood</u>, reduced economic productivity <del>and opportunities</del>, and increased vulnerability to NCDs and other chronic diseases <u>in adulthood</u>. These diseases <u>may</u> lead to early death and increased <del>morbidity and</del> disability, <del>and which</del> require higher spending on health care, <u>and</u> <del>placeing</del> <u>placing</u> significant burdens on national health care systems and economies.</p> <p><u>* If there is an intention to modify original text by making special focus on school-age children, it is proposed to consider also categories of pre-school age children and adolescents (Russian Federation)</u></p> <p><u>* request to link this para to paras 7, 8, 9 and 10 by mentioning need for evaluation on impact on health of current food systems (CSM)</u></p> <p><u>* request to move this para after para 7 (EU)</u></p>	
Para 6	<p>Malnutrition in all its forms has many <b>interrelated and underlying causes</b> that need to be addressed simultaneously. <u>They manifest differently and affect people in different ways depending on their gender, age, wealth, and other social markers.</u> Among <del>them</del> <u>these causes</u>, the lack of stable access to safe, <u>sufficient and nutritious</u> food and healthy diets, <u>lack of information concerning dietary recommendations</u>, inadequate infant and young child-caring and feeding practices, poor sanitation, <u>and</u> hygiene and <u>insufficient access to</u> safe drinking water, <u>antimicrobial resistance</u>, insufficient access to quality education and health services, low socioeconomic status, <u>gender inequality</u>, and marginalization. Basic causes of poor nutrition <u>[encompass include the economic and societal structures and processes that]</u> <u>[slow down the realization of human rights,]</u> <u>and</u> perpetuate <del>poverty</del> <u>inequalities, and fail to make healthy diets readily accessible</u>, limiting or denying the access of <del>vulnerable populations</del> <u>all</u> to essential resources <u>and services</u> for achieving optimal nutrition and health. <u>Lifestyle changes have developed rapidly, such as convenience foods with lower nutritional values.</u></p> <p><u>* request to recognize that malnutrition is essentially the result of an imbalance between ecosystems and human-led forced (CSM)</u></p>	EU, FAO, USA, UNN4SUN, CSM
Para 7	<p><b>Poverty and inequality</b> are important underlying causes of hunger and malnutrition in all its forms. Low <u>and</u> <u>under</u>employment <del>rates</del>, <u>low</u> wages <u>and</u>, incomes, and <u>decreased</u> purchasing power have negative consequences on nutrition and health outcomes. Negative economic trends limit the capacity of national governments to deliver essential social services and health care to their citizens. In this context, inequality in income and asset distribution as well as in access to nutrition-relevant services contributes to marginalization and social exclusion, and further increases</p>	USA

	<p>vulnerability to malnutrition.</p> <p><i>* alternative second sentence: “Under-resourced food assistance programmes, nutrition-relevant services, nutrition-related services, social services, and health care further contribute to poor nutrition and health outcomes as well as to marginalization and social exclusion, which further increases vulnerability to malnutrition” (USA)</i></p>	
<p>Para 8</p>	<p><b>Those most affected by malnutrition in all its forms</b> typically include people with increased nutrient requirements and those who have less control over their dietary choices. <i>This includes including</i> young and school-aged children, adolescents, pregnant and lactating women, the elderly, and people with disabilities. In addition, Indigenous Peoples, <i>subsistence farmers</i>, peasants, urban and rural poor, agriculture workers, upland and remote communities, migrants, refugees and displaced people are particularly vulnerable to malnutrition because of their persistent or temporary poverty <i>and marginalization</i>.</p> <p><i>* request to refer to all workers of the value chain, not only agricultural workers (CSM)</i></p> <p><i>* alternative last sentence: “In addition, those who live in impoverished conditions are particularly vulnerable to malnutrition” (USA)</i></p>	<p>FAO, Switzerland, Norway, CSM, USA</p>
<p>Para 9</p>	<p><b>Complex and protracted crises</b> also have short, medium and long-term adverse consequences on the nutritional status of impacted populations, particularly pregnant and lactating women <i>and girls</i>, and children under five. Conflicts, fragility, and susceptibility to <i>natural</i> climate <i>change</i>-related disasters pose <del>a</del> major threats to the ability of food systems to deliver healthy diets and to the <i>successful</i> implementation of the 2030 Agenda for Sustainable Development <del>as a whole</del>. <i>At the same time, malnutrition and food insecurity might be important drivers of social unrests, conflicts and migration</i></p> <p><i>* request to expand this paragraph by adding text on COVID-19/pandemics (Japan, PSM, EU, Russian Federation, Costa Rica)</i></p> <p><i>* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</i></p> <p><i>*additional paragraph is suggested: “No healthy balanced and sustainable diets because of dependence on few crops - as of 2014, fewer than 200 species had significant production levels globally, with only 8 crop species (barley, beans, groundnut, maize, potatoes, rice, sorghum and wheat) providing 53 percent of average daily calories consumed, and 5 animal species (cattle, sheep, goats, pigs and chickens) providing 31 percent of average daily protein consumed, and 3 crop species (wheat, rice and maize) representing 48 percent of average daily calories consumed” (FAO)</i></p>	<p>WFP, Switzerland, USA, IPES-FOOD, Japan, PSM, Thailand, EU, Russia, Costa Rica, FAO</p>

<p>Para 10</p>	<p><b>Climate change, agriculture, food and nutrition are interconnected.</b> Climate change affects temperature and precipitation, as well as the frequency and severity of extreme weather events. Increases in temperature, heat waves, <del>and</del> droughts <u>and floods, land degradation</u> impact agriculture, with the largest effects being decreased crop yields and livestock productivity, as well as declines in <u>aquaculture</u>, fisheries and <del>agro</del>forestry <u>production</u> in areas already vulnerable to food insecurity. Climate change also <del>impacts</del> <u>affects all the dimensions of food security, as well as</u> food quantity, quality, safety and ultimately food prices, with significant implications for <u>[the availability of healthy diets] [food security]</u>. <u>Climate change can also contribute to changing nutrient composition of major staple crops (decreasing protein and mineral concentration and B vitamins)</u>. At the same time, <u>current un</u>sustainable agriculture and food production <u>practices along with unsustainable diets and food waste are major contributors</u> contribute to greenhouse gas emissions, <u>biodiversity loss, loss of natural pest control</u>, and account for large portions of the planet’s land, <u>soil</u>, and fresh-water use. <u>Enhancing the sustainability of food systems and their resilience is thus a precondition for sustainable and healthy diets. In this regard, consumption patterns play a role, as carbon- and other environmental impacts differ across food products and production methods</u></p> <p><u>* Suggestion to amend last sentence to acknowledge that not all types of agrifood production contribute to GHG emissions (Argentina)</u></p> <p><u>*request to add footnote to HLPE report on climate change after “fresh-water use” (EU)</u></p> <p><u>* Alternative text for the last sentence: “At the same time, food production is the largest cause of global environmental change. Agriculture occupies about 40% of global land, and food production is responsible for 30% of global greenhouse gas emissions and account for 70% of freshwater use” (WFP)</u></p> <p><u>* request to refer to impact of climate change on biosecurity with an increase of pests and diseases affecting food production (New Zealand)</u></p> <p><u>* request to refer to impact of climate change on nutritional value of food (Thailand) – see EU suggestion in the text</u></p> <p><u>* request to refer to how to build food systems that are resilient not just to climate change, but also to pandemics, economic and financial crises (CSM)</u></p> <p><u>* request to make reference to “sustainable and healthy diets” (Switzerland)</u></p>	<p>Switzerland, Russia, USA, Canada, FAO, EU, Brazil, Argentina, WFP, New Zealand, Thailand, CSM, Switzerland</p>
<p>Para 11</p>	<p><b>Unhealthy diets</b> have become a major risk factor of multiple forms of malnutrition and <u>poor</u> health outcomes globally.</p>	<p>USA, CSM, FAO, Switzerland, CSM,</p>

~~Global-D~~ietary patterns have been changing globally, [~~affecting people across all parts of~~over the world] [~~leading to an unhealthy unified pattern~~]. In many regions of the world, dietary changes are shifting towards the consumption of [~~convenient~~] and highly processed [~~ready to eat or easy to prepare~~] food and beverages with [~~high~~] [~~excessive~~] content in free sugar and/or in saturated fat, salt ~~as well as low consumption of vegetables, fruits and whole grains~~. Diets based on ~~these foods which~~ are associated with an increased prevalence of overweight, obesity and NCDs. Profound dietary changes, ~~both positive and positive~~, are occurring ~~for several reasons, including~~ due to consumer choices, which have been impacted by the movement of people to urban places, ~~the increase purchasing power and preferences of newly middle-class consumers~~, the influence of globalization and trade within the food system, ~~changing food environments, the continued loss of access to~~ movement away from healthy aspects of traditional diets, and changing lifestyles.

\* alternative text for second sentence: *“Diets are moving away from local and well balanced healthy consumption patterns, with basic and non-staple food products such as wholegrains, legumes, nuts and seeds, fruits and vegetables towards more unhealthy ones, often including products containing high levels of saturated fat, sugar or salt”* + add footnote to SOFA 2017 (EU)

\* positive role of trade to be acknowledged here and throughout the document (Argentina, Australia, New Zealand, PSM, WTO) – possible compromise solution (addition of “both positive and negative” after “Profund dietary changes” and keep it as a separate paragraph) suggested by USA

\* suggested additions at the end of the paragraph:

a) *“An individual’s food choices have impacts that resonate far beyond themselves: diets reflect larger systemic issues that impact population, health, sustainability, and justice. At the same time individuals have limited control over their food choices as it is to large degree influenced by the societal and food system environment”* (Switzerland)

b) *“Dietary changes have become a major risk factor of multiple forms of malnutrition, health and environmental outcomes globally”* (EU)

c) *“Food production at both domesitic and international levels has diversified and there has been a proliferation of production of foods that have lower nutritional value”* (New Zealand)

\* request to mention that food systems have become more interconnected from global to local levels, with longer and more complex food supply chains (CSM)

Japan, Mexico, Canada, PSM, Argentina, EU, New Zealand, Australia, NZ, WTO, WFP

	<p>*Suggestion to provide definition of traditional diets in a footnote: <i>“Traditional diets are those diets that result from the wisdom and knowledge of communities’ ancestors and the cultural essence passed down through generations. Traditional diets are often based on foods, cultivation and cooking methods and skills able to maximize community health and well-being. Based on the local availability of foods, traditional diets are generally based on regular intake of fresh vegetables, fruits, whole grains, legumes and moderate to regular intake of animal proteins (meat, fish and eggs). Traditional diets respect communities’ cultures, promote health, environmental sustainability, biodiversity conservation, and women empowerment.”</i> (WFP)</p>	
<p>Para 12</p>	<p><b>Food systems</b> <del>shape people’s dietary patterns and nutritional status.</del> Food systems are complex webs of activities, <del>resources</del> and actors involving the production, processing, handling, preparation, storage, distribution, <del>marketing, access, purchase, consumption</del> and <del>ultimately [even loss and waste of food].</del> They are constantly being shaped by different forces, drivers and decisions by many different <del>individuals</del> stakeholders – when these external factors are in favor, food systems are enabled to produce healthy diets needed for optimal nutrition. <del>[Some of the current global food systems, characterized by excessive consumption and waste patterns, are unsustainable: some of the current global dietary trends are negatively impacting the world’s natural resources (such as land and fresh water), biodiversity, and ecosystems in the context of population growth and pressure.]</del> It is essential to transform <del>Every</del> food system <del>has to have</del> the capacity to be equitable and to produce healthy diets needed for optimal nutrition. <del>Systems that do not meet the needs of their population due to</del> <del>But,</del> <del>they can also be shaped by</del> power concentration, <del>and</del> imbalances and other factors should be transformed appropriately to serve those needs and <del>made,</del> <del>which may not be</del> inclusive, and equitable and resilient. Some food systems [are sustainable] [can operate in a sustainable way] while others should be improved to be sustainable <del>show their limits in terms of sustainability and inefficiency in their use of natural resources utilization, and in the use of labour and energy, leading to to avoid environmental, natural resource and soil degradation, disease emergence, water, soil and air pollution, and loss of ecosystems and biodiversity as well as to excessive food consumption unhealthy diets and food loss and waste patterns.</del> [Over the years international trade has contributed to expanding the human diet, contributing to nutritional diversity. However, international and regional trade must take place within an appropriate regulatory framework.] [Changes are needed within and across food systems, with the aim to generate positive outcomes along the three dimensions of sustainability – social, economic and environmental.]</p> <p><i>*alternative proposal for second and third sentences: “They are constantly being shaped by different forces, drivers and decisions by many different individuals – when these external factors are in favor, food systems are enabled to produce healthy diets needed for optimal nutrition Although every food system has this capacity, food systems are constantly being shaped by power concentration and imbalances, which may not be inclusive and equitable”</i> (WFP)</p>	<p>Norway, FTA, EU, Switzerland, FAO, WFP, PSM, Argentina, New Zealand, CSM, CGIAR, Canada, Mexico, USA, WTO, CSM, Indonesia</p>

	<p><u>*alternative proposal regarding the second part of the paragraph, from “But they can also be shaped by...” until the end: “The sustainability of food systems – including environmental, social and economic sustainability – determines the ability of food systems to provide healthy diets for current and future generations. This indicates that in order to improve nutrition, context-specific changes are needed not only in agriculture and food policies, but also across multiple sectors and policy areas that address the sustainability of food systems” (USA)</u></p> <p><u>*suggestion to use HLPE definition of sustainable food systems to replace the last sentence which focuses only on the environmental component of sustainability (FTA)</u></p> <p><u>* request to make food systems definition more prominent, not just as a footnote + to move beyond linear perspective of production-consumption of food but rather to underpin multiple objectives food systems can serve + to recognize that globalization an trade are major drivers of unhealthy diets + to mention that current global food systems, with their excessive consumption and waste patterns are unsustainable + to prioritize systems that are environmentally sustainanle but also culturally appropriate, equitable and contribute to Right to Food, such as agroecology (CSM)</u></p> <p><u>* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</u></p> <p><u>* request to move this paragraph to section 1.2 Key Concepts (Indonesia)</u></p>	
Para 13	<p>The <b>functionality of food systems</b> and their ability to deliver healthy diets is influenced by a number of drivers which indicate that, in order to improve nutrition, context specific changes are needed not only in agriculture and food policies, but also across multiple sectors and policy areas that address, for example, national development priorities, economic policies, <u>natural resource management</u> and social norms. <u>Context specific changes may require tailoring approaches to address the different drivers of inequities for women and men across different intersecting social markers of age, wealth, religion etc.</u></p> <p><u>* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</u></p> <p><u>* request to make right to food as a core element of this paragraph (CSM)</u></p> <p><u>* proposed deletion of the paragraph (USA)</u></p>	FAO, Switzerland, CSM, EU, USA
Para 14	<p><u>[Transforming <b>unsustainable</b> food systems and promoting sustainable food systems] [Ensuring and promoting sustainable food systems] that meet the dietary needs of populations require <b>policy, institutional and behavioural changes which are context-specific</b> among all food system actors <b>and based on the results of assessments of all direct and indirects</b></u></p>	EU, Switzerland, Canada, FAO, Argentina, USA,

	<p><u>environmental and social impacts of various food systems</u>. [Food system-related policies need to <del>focus-consider on</del> their economic, social, environmental, cultural, nutritional, and health consequences, paying special attention to the poorest and most vulnerable to malnutrition and addressing barriers they face in <u>producing and</u> accessing <u>safe, diverse and nutritious</u> food <del>for that contributes to</del> healthy diets].</p> <p><u>*suggestion to make reference to “Trasformation to more sustainable food systems” (USA)</u></p> <p><u>* request to differentiate between “transforming food systems” and “promoting sustainable food systems” (CSM)</u></p> <p><u>*suggested deletion of last sentence of the paragraph (USA)</u></p> <p><u>* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</u></p> <p><u>* additional paragraph was suggested on the importance to address food losses and waste as one of the key issue in the achievement of sustainable food system (Indonesia)</u></p>	EU, CSM, Switzerland, Indonesia
Para 15	<p><b>Changes in governance</b> are needed within and across food systems, and its constituent elements, namely food supply chains, food environments, consumer behaviour to generate positive outcomes along the three dimensions of <u>sustainability sustainable development</u> – social, economic, and environmental. <u>Hence, initiatives like the SUN Movement speak to the renewed interest and increased attention that nutrition is receiving from the global community, including UN and Member States.</u></p> <p><u>* in case the reference to governance is retained, it is suggested to make reference also to governance of land and natural resources (FAO)</u></p> <p><u>* suggestion to merge this paragraph with paragraoh 16 (EU)</u></p>	USA, Argentina, UNN4SUN, FAO, EU
Para 16	<p><b>Coordination processes</b> are required <b>to address policy fragmentation and its subsequent negative impact on sustainable food systems and nutrition</b> across sectors such as health, agriculture, education, environment, water, sanitation, gender, social protection, trade, employment, and finance – all of which <u>impact-can influence</u> nutrition and food system outcomes. <u>Addressing specific components of food systems through targeted guidance: for example, developing guidance in the context of Frameworks for Managing Food Safety Challenges through Enhanced Process and Procedures</u>, are essential to showcase for national governments and their decision makers how to assess, define and implement specific areas of food system transformations, such as food safety that cuts across and must be</p>	Switzerland, USA, EU, UNICEF, PSM

	<p><u>coordinated across all aspects from pre-production to consumption.</u></p> <p><i>* Alternative text for the paragraph: “Changes in governance are needed within and across food systems, and its constituent elements, namely food supply chains, food environments), consumer behavior, to generate positive outcomes along the three dimensions of sustainability – social, economic, and environmental. To this end policy makers should endeavor to ensure that food prices shall reflect the true social, economic and environmental costs of present food systems. New policies are required to enhance policy coherence, through being designed and coordinated across sectors such as health, agriculture and food systems, education, environment, water, sanitation, gender, social protection, trade, employment, and finance – all of which impact nutrition outcomes”. (EU)</i></p>	
Para 17	<p>The Committee on World Food Security (CFS) <del>has undertaken a policy process to produce</del> <u>agreed to develop the <b>Voluntary Guidelines on Food Systems for Nutrition (VGFSyN)</b></u>. The preparation of the VGFSyN is informed by the findings and scientific evidence provided in the <a href="#">High Level Panel of Experts on Food Security and Nutrition’s (HLPE) Report on Nutrition and Food Systems</a>, additional literature as well as a consultation process that took place between May and November 2019 which involved the participation of CFS stakeholders in <u>global meetings in Italy, and in regional consultations in Ethiopia, Thailand, Hungary, Egypt, Panama, and the United States of America, as well as through an electronic consultation.</u></p>	USA, GAIN, Switzerland, Canada
Para 18	<p><del>This policy process is taking place at the same time as a variety of organizations from different sectors are addressing malnutrition.</del> Food systems and nutrition <del>have are</del> <u>receiving</u> <b>increased attention from the global community</b>, including the United Nations (UN) and its Member States, and are recognized as essential co-determinants for achieving the goals of the 2030 Agenda for Sustainable Development. In 2014, at the Second International Conference on Nutrition (ICN2), members of the Food and Agriculture Organization (FAO) and the World Health Organization (WHO) committed to ending hunger and malnutrition in all its forms. In 2016, the General Assembly of the UN (UNGA) proclaimed the UN Decade of Action on Nutrition (2016-2025) and called upon FAO and WHO to lead its implementation, in collaboration with the World Food Programme (WFP), the International Fund for Agricultural Development (IFAD), and the United Nations Children’s Fund (UNICEF), using <u>coordination mechanisms such as the Standing Committee on Nutrition and multistakeholder platforms such as the CFS.</u> In 2017, the UNGA proclaimed the United Nations Decade of Family Farming (2019-2028). Specific attention to nutrition has been given by a number of UNGA Resolutions, the UN Economic and Social Council (ECOSOC), the UN Environment Assembly, the World Health Assembly (WHA), <u>the Codex Strategic Plan 2020-2025,</u> and the UN Special Rapporteur on the Right to Food.</p> <p><i>* request to add reference to Nutrition for Growth and Food System Summits (Japan, Canada) + request to refer to FSS (EU)</i>  <i>* request to add reference to WHO REPLACE initiative and to the Global Action Plan for the Prevention of Non-Communicable Diseases 2013-2020 (New Zealand)</i>  <i>* request to add footnote referring to UN political declaration on NCDs (PSM)</i></p>	Switzerland, Japan, Canada, New Zealand, EU, USA, PSM

	<p>* <a href="#">request to delete reference to UN Decade of Family Farming (USA)</a></p> <p>* <a href="#">suggestion to move second sentence to the end of the paragraph (USA)</a></p>	
Para 19	<p>The VGFSyN are expected to contribute to and complement these international initiatives with a view to <b>promoting policy coherence</b>. They provide evidence-based guidance to help countries <a href="#">and other relevant stakeholders</a> operationalize ICN2’s Framework for Action recommendations in support of the progressive realization of the right to adequate food in the context of national food security and of the right <a href="#">of everyone to the enjoyment of the highest attainable standard of physical and mental health</a>, and of the achievement of Sustainable Development Goal (SDG) 2, with particular attention to targets 2.1, 2.2, <del>and 2.4</del> <a href="#">and 2.5</a>. In addition, the VGFSyN should play an essential role in assisting countries to achieve other related SDGs [(SDG 1, 3, 4, 5, 6, 8, 10, 12, <a href="#">13, 14, and 15</a>)].</p>	EU, Norway, Indonesia, Canada, USA
<b>1.2 KEY CONCEPTS</b>		USA, Russia
* <a href="#">suggestion to to delete this section and to put all definitions into footnotes (USA) – request to keep this section (Russian Federation)</a>		
Para 20	<p><b>Healthy diets</b> are those diets that are of adequate quantity and quality to achieve optimal growth and development of all individuals - <a href="#">including women’s empowerment</a> - and support functioning and physical, mental and social wellbeing at all life stages. They help to protect against malnutrition in all its forms, including undernutrition, micronutrient deficiency, overweight and obesity} as well as <a href="#">against diet-related</a> NCDs, such as diabetes <a href="#">type II</a>, heart disease, stroke and cancer. The exact [make-up] <a href="#">[composition]</a> of healthy diets varies depending on individual characteristics (e.g. age, gender, lifestyle and degree of physical activity), cultural context, local availability of foods and dietary customs. They are diversified, balanced, <a href="#">[improving the intake of nutritious foods, rich in nutrients, beneficial for growth, health and development such as vitamins and minerals]</a> and safe, <a href="#">based on natural and traditional foods</a>, and should <a href="#">combine different fruit, vegetables, legumes (e.g. lentils and beans), nuts, whole grains (e.g. unprocessed maize, millet, oats, wheat and brown rice) and foods from animal sources, while limiting the intake of saturated and industrially-produced trans fats, added-free sugars, and sodium. According to WHO, fat intakes should be no more than 30 percent of total energy intake, added sugar should be less than 10 percent of total calories, and salt consumption should be below 5 grams per day.</a> Healthy dietary practices start early in life – breastfeeding <a href="#">reduces child mortality</a>, fosters healthy growth, <del>and</del> improves cognitive development and <del>may have</del> long-term health benefits. <a href="#">[Safe and clean drinking water is an important component of a healthy diet.] [Complementary feeding should be associated with healthy eating habits and prescribe that ultra-processed food should not be offered to children under two years of age.] [WHO indicates that for a diet to be healthy: A) daily needs of energy, vitamins and minerals should be met, but energy intake should not exceed needs; B) consumption of fruit and vegetables is at least 400 g per day; C) total fat intake is less than 30% of total energy intake; D) intake of saturated fats is less than 10% of total energy intake; E) intake of trans-fats is less than 1% of total energy intake; F) intake of free sugars is less than 10% (preferably, less than 5%) of total energy intake; D) intake of salt is less than 5 g per day]</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Proposal to replace “limit the intake of saturated and trans fats, free sugars, and sodium” with “empower the individual to make informed choices by educating the public about the harms of the excessive intake of fats, in particular saturated fats and trans-fats, sugars and salt, promote the intake of fruits and vegetables, as well as healthy and balanced sustainable diets, and reduce sedentary behavior” (Japan)</a></li> </ul>	UNN4SUN, Thailand, EU, Canada, WFP, WHO, FAO, New Zealand, Australia, Thailand, PSM, Mexico, Japan, Brazil, Russia, CSM

	<ul style="list-style-type: none"> <li>• <u>request to update footnote (WHO)</u></li> <li>• <u>support to the original version of the definition without the inclusion of reference to women’s empowerment (Russian Federation)</u></li> <li>• <u>doubts on the separation of the definition of sustainable healthy diets from healthy diets which leaves the possibility to see diets as a concept separated from its ecological aspect (CSM)</u></li> </ul>	
Para 21	<p><b>[Sustainable healthy diets]</b> are healthy diets that <u>promote all dimensions of individuals’ health and wellbeing. They are accessible, affordable, safe, equitable, culturally acceptable and</u> combine all the dimensions of sustainability to avoid unintended consequences <del>and that would</del> <u>undermine the sustainable and</u> healthy diets of future generations. They contribute to the <del>preservation</del> <u>conservation and sustainable use</u> of biodiversity, <u>including genetic resources for food and agriculture</u>, and have a low environmental pressure and impact.</p> <ul style="list-style-type: none"> <li>• <u>Proposed deletion of this definition throughout the document (Russian Federation, Brazil, Argentina, Canada, Chile, USA, Thailand)</u></li> <li>• <u>Alternative concept in line with UN agreed language, A/RES/73/2, para 34: “<b>Healthy balanced and sustainable diets</b>” (FAO)</u></li> <li>• <u>Proposed expansion of, and support to the definition (Switzerland, EU, CSM, WHO; Mexico):</u> <ol style="list-style-type: none"> <li><u>alternative text suggested by Switzerland, from Draft One: “Sustainable and healthy diets “promote all dimensions of individuals’ health and wellbeing; have low environmental pressure and impact; are accessible, affordable, safe and equitable; and are culturally acceptable. The aims of sustainable [and] healthy diets are to achieve optimal growth and development of all individuals and support functioning and physical, mental and social wellbeing at all life stages for present and future generations; contribute to preventing all forms of malnutrition (i.e. undernutrition, micronutrient deficiency, overweight and obesity); reduce the risk of diet-related NCDs; and support the preservation of biodiversity and planetary health. Sustainable [and] healthy diets must combine all the dimensions of sustainability to avoid unintended consequences”</u></li> <li><u>Alternative second sentence: “They contribute to the conservation of biodiversity, the pressure they exert on the environment and their environmental impact are low, and they provide decent incomes and livelihoods for small agricultural producers” (Mexico)</u></li> </ol> </li> </ul> <p><u>* request to adopt the already established definition formulated by FAO and WHO (New Zealand, CSM)</u>  <u>* additional footnote is suggested: IPBES 2019, The global assessment report on biodiversity and ecosystems services (EU)</u></p>	<p>FAO, EU, FTA</p> <p>Russia, Brazil, Argentina, Canada, Chile, USA, Thailand, FAO, Switzerland, EU, CSM, Thailand, Mexico, New Zealand, CSM</p>
Para 22	<p><b>Nutritious foods</b> <u>that meet dietary needs and food preferences for an active and healthy life</u> are those foods that <del>tend to</del> <u>bear</u> <i>high</i> in essential nutrients such as vitamins and minerals (micronutrients), as well as proteins, unrefined <u>fibre-rich</u> carbohydrates <del>such as fibre</del>, and/or unsaturated fats and [are low in] <u>[have an adequate amount of]</u> sodium, <del>added-free</del> <u>sugars, saturated fats and [trans fats] [industrially produced trans fatty acid]. [Nutritious crops include fruits, vegetables, nuts and seeds, legumes, and diverse animal-source foods (including dairy products, fish, eggs and meat)] [Healthy and nutrition eating, beyond the mere intake of nutrients, refer to foods that contain and provide those nutrients, to how foods</u></p>	<p>Japan, Argentina, WHO, Australia, Chile, WFP, Brazil, Canada, Switzerland, EU, Thailand, CSM</p>

	<p>are combined and prepared, to the level of food processing, and to the way of eating and the cultural and social dimensions of eating practices]</p> <p>* <u>alternative text for the beginning of the first sentence: “Nutritious foods are among other factors (e.g. the level of processing, the balance and relation of different nutrients) in the first place safe foods that...” (EU)</u></p> <p>* <u>suggestion to expand this definition by referring to types of nutritious foods that are found in dietary patterns linked with beneficial effects on health (Canada)</u></p> <p>* <u>request to include reference to source of definition (Switzerland) – request to make reference to the HLPE report (EU)</u></p> <p>* <u>proposal to mention macronutrients before micronutrients (Thailand)</u></p> <p>*<u>proposed deletion of this definition (CSM)</u></p>	
Para 23	<p><b>The right to adequate food</b> is <u>embedded in international human right law and is</u> realized when every [man, woman and child] <u>[boy, girl, woman and man]</u>, alone or in community with others, have the physical and economic access at all times to adequate food or means for its procurement. The right to adequate food implies the availability of food in a quantity and quality sufficient to satisfy the dietary needs of individuals, free from adverse substances and acceptable within given culture.</p> <p>* <u>request to include reference to “adequate nutrition” (CSM)</u></p> <p>*<u>suggestion to re-incorporate definitions of food systems and sustainable food systems (Switzerland, Canada, EU, Costa Rica, FAO, CSM):</u></p> <p>a) <b>Food systems</b> <u>“gather all the elements (environment, people, inputs, processes, infrastructures, institutions, etc.) and activities that relate to the production, processing, distribution, preparation and consumption of food, and the output of these activities, including socio-economic and environmental outcomes”</u></p> <p>b) <b>Sustainable food systems</b> <u>are food systems that ensure food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition of future generations are not compromised</u></p>	Norway, EU, CSM
<p><b>PART 2 – OBJECTIVES AND GUIDING PRINCIPLES</b></p> <p><u>Suggested amendment to the title “Approach and Guiding Principles” (Norway)</u></p>		
<p><b>2.1 – OBJECTIVES AND PURPOSE</b></p> <p><u>Suggested amendment to the title “Approach” (Norway)</u></p>		Norway
Para 24	The <b>objective of the VGFSyN</b> is to contribute to transforming <u>unsustainable</u> food systems and promoting sustainable food	EU, Argentina,

	<p>systems to <u>ensure-guarantee</u> that the food that contributes to sustainable healthy diets is available, affordable, accessible, <u>sustainably produced</u>, safe, and of adequate quantity and quality while <u>respecting planetary boundaries and</u> conforming “with beliefs, culture and traditions, dietary habits, and preferences of individuals, in accordance with national and international laws and obligations. <u>The VGFSyN are intended to be a reference point that provides evidence-based guidance on effective policies, investment and institutional arrangements that will address malnutrition in all its forms and healthy and sustainable diet from a food system perspective.</u></p> <p><u>* suggestion to move this paragraph to Part 1 (Norway)</u>  <u>* alternative text for the paragraph: “The objective of the VGFSyN is to contribute to the transformation to more sustainable food systems for nutrition by helping governments and other actors to make informed, science based policy choices that support the availability, affordability, accessibility, and safety of healthy, culturally accepted diets now and into the future delivered through sustainable food systems” (USA)</u></p>	Switzerland, WWF, Norway, USA
Para 25	<p>The VGFSyN follow a <b>comprehensive, systemic, cross-sectoral, and science- and evidence-based approach</b> to [addressing policy fragmentation with a special emphasis on the food, agriculture, and health sectors, while also addressing social, environmental and economic sustainability issues] <u>[building mor sustainable food systems to improve current and future food security and nutrition]</u> <u>paying due attention to all direct and indirect environmental, economic and social impacts.</u> The VGFSyN provide guidance on effective policies, investments and institutional arrangements. The VGFSyN are expected to address the diversity and complexity of food systems with the intention <del>of to</del> <u>promoteing</u> policy coherence, <u>that</u> <u>considering</u> benefits and trade-offs, and <u>to foster</u>ing and <u>guideing</u> <u>inclusive</u> dialogues among different institutions, <del>and</del> <u>sectors and all relevant stakeholders in the food systems.</u></p> <p><u>* request to include also alternative forms of knowledge based on experiences and traditional and indigenous forms of knowledge sharing such as oral transmission (CSM)</u></p>	USA, EU, CSM
Para 26	<p>The VGFSyN are intended to be global in scope and to provide <b>guidance to policy-makers and relevant stakeholders</b> when designing context-specific policies, laws, regulatory frameworks, strategies, plans and programmes. They take into consideration different national realities, capacities, and levels of development, as well as different types of food systems and the many drivers impacting them. <u>The VGFSyN can also inform nutrition and food systems advocacy and being used by media and other groups such as chefs, that can be leveraged to support nutrition-smart food systems.</u></p>	UNN4SUN
Para 27	<p>These VGFSyN take <b>evidence</b> from a range of rigorous studies, <u>best-good</u> practices, and world experience - <u>[at municipal],</u> <del>at</del> <u>sub-national, and at</u> <u>national and regional</u> levels - and apply the evidence through a broad lens. Much of the evidence in the VGFSyN comes from the HLPE 2017 report, various UN technical documents, and peer-reviewed scientific literature.</p>	USA, EU, Argentina
<b>2.2 – NATURE OF THE VOLUNTARY GUIDELINES AND THEIR INTENDED USERS</b>		
Para 28	<p>The VGFSyN are non-binding and should be <b>interpreted and applied-implemented consistently with existing obligations</b> under relevant national and international law, including <u>[the Universal Declaration of Human Rights (1948)]</u></p>	USA, Indonesia, IPES-FOOD, CSM

	<p>and other agreed international human rights instruments, <a href="#">WTO instruments</a>, and with due regard to voluntary commitments under applicable international and regional instruments. <a href="#">The VGFSyN should be interpreted in accordance with national legal systems and their institutions</a>. CFS guidance should build upon and integrate existing instruments and frameworks for action adopted in the context of the UN system, guidance, and recommendations endorsed by Member States. <a href="#">Nothing in the VGFSyN should be read as limiting or undermining any legal obligations to which States may be subject under international law</a>.</p> <p><a href="#">*request to delete reference to Universal Declaration of Human Rights (Indonesia)</a>  <a href="#">* request to add reference to UN Declaration on Rights of Peasants and Other People Working in Rural Areas, UNDROP (IPES-FOOD)</a>  <a href="#">*request to add reference to International Covenant on Economic, Social and Cultural Rights (CSM)</a></p> <p><a href="#">* request that the guidelines refer to legally binding obligations from human rights legislation or framework conventions and national and international law more explicitly (CSM)</a></p>	
Para 29	<p>The VGFSyN are intended to <b>avoid duplication of the work and mandate of other international bodies</b>, and build upon and complement related guidance contained in other CFS products with specific attention paid to:</p> <ul style="list-style-type: none"> <li>• <a href="#">Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of the national food security (2004)</a>,</li> <li>• <a href="#">CFS Voluntary Guidelines on the responsible governance of tenure of land, fisheries and forests in the context of national food security – VGGT (2012)</a>,</li> <li>• <a href="#">CFS Principles for responsible investment in agriculture and food systems – RAI (2014)</a>,</li> <li>• <a href="#">CFS Policy Recommendations on Food losses and waste in the context of sustainable food systems (2014)</a>,</li> <li>• <a href="#">CFS Policy Recommendations on Sustainable fisheries and aquaculture for food security and nutrition (2014)</a>;</li> <li>• <a href="#">CFS Framework for Action for food security and nutrition in protracted crises – FFA (2015)</a>,</li> <li>• <a href="#">CFS Policy Recommendations on Water for food security and nutrition (2015)</a>,</li> <li>• <a href="#">CFS Policy Recommendations on Connecting smallholders to markets (2016)</a>, and</li> <li>• <a href="#">CFS Policy Recommendations on Sustainable agricultural development for food security and nutrition: what roles</a></li> </ul>	Norway, FTA, CSM, WWF, FAO

	<p><a href="#">for livestock? (2016)</a>:-</p> <ul style="list-style-type: none"> <li><a href="#">CFS Policy Recommendations on Sustainable forestry for food security and nutrition (2017)</a>.</li> </ul> <p>* <a href="#">request to add reference to policy recommendations on agroecological and other innovative approaches (Switzerland, CSM, WWF)</a></p> <p>* <a href="#">request to add reference to Voluntary Guidelines for Securing Sustainable Small-Scale Fisheries in the Context of Food Security and Poverty Eradication (FAO) -</a></p>	
Para 30	<p>The VGFSyN are <b>primarily targeted at <del>governmental actors</del> governments</b> to help them develop holistic, <a href="#">multisector, evidence-based</a> and inclusive public policies. They are <a href="#">the primary duty-bearers to respect, protect and fulfill rights of individual rights holders</a>. The VGFSyN are also to be used in policy discussions and implementation processes by relevant stakeholders such as:</p> <ol style="list-style-type: none"> <li><a href="#">[<del>Governmental actors</del> Governments</a>, including relevant ministries and national, sub-national, and local institutions, and parliamentarians;</li> <li>Intergovernmental <del>and regional</del> organizations, including specialized UN agencies <a href="#">and regional organizations</a>;</li> <li>Civil society and non-governmental organizations, including those representing Indigenous Peoples, vulnerable groups and <a href="#">local</a> communities, and smallholders, fisherfolks, pastoralists, landless and <a href="#">food system</a> workers;</li> <li>Farmer <a href="#">and fisheries</a> organizations, <a href="#">cooperatives</a> and their networks;</li> <li>Private sector <a href="#">[<del>actors</del>organizations]</a>, including agribusiness, food and beverage manufacturers, food retailers including supermarkets, food service providers, industry trade associations, food wholesalers, food distributors, <a href="#">importers and exporterstraders</a>, and the advertising and marketing <del>industry</del>sector;</li> <li>Research organizations, academic institutions, and universities;</li> <li>Development partners, including international financial institutions;</li> <li>Private donors, foundations, and funds;</li> <li>Consumer associations.</li> </ol> <p>* <a href="#">request to replace “governmental actors” with “governments” throughout the document (EU, Norway)</a></p> <p>* <a href="#">request to add a footnote at the end of bullet C: “Smallholders, fisherfolks, pastoralists are included in ‘Civil Society’ when they retain the complex status as food producers, workers and consumers” (EU)</a></p>	EU, Chile, Norway, Switzerland, Indonesia, EU, Norway, FAO, PSM

	<p>* request to replace “private sector actors” with “private sector” throughout the document (EU)</p> <p>* request to delete “primarily targeted at governmental actors” from the first line of the paragraph (Indonesia)</p> <p>* request to include a standalone category for Indigenous Peoples representatives (FAO)</p> <p>* request to add a stand-alone category for “multi-sector and multistakeholder forums” (PSM)</p>	
<p><b>2.3 – GUIDING PRINCIPLES FOR TRANSFORMING UNSUSTAINABLE FOOD SYSTEMS OR PROMOTING SUSTAINABLE FOOD SYSTEMS</b></p> <p>*suggested alternative title: GUIDING PRINCIPLES FOR THE TRANSFORMATION TO MORE SUSTAINABLE FOOD SYSTEMS FOR PROMOTING NUTRITION (USA)</p> <p>* request for clarification on the use of “or” in the title (Indonesia)</p>		EU, USA, Indonesia
Para 31	<p>The VGFSyN include <b>five guiding principles</b> that emerged from the consultation process as foundational when considering the different actions that should be followed to contribute to [transforming <del>food systems- as appropriate</del> - and promoting sustainable food systems that enable healthy diets] [the tranformation to more sustainable food systems that support healthy diets].</p> <p>* request to add “unsustainable” between “transforming” and “food systems” (EU)</p>	Argentina, Indonesia, USA, EU
Para 32	<p>These principles draw on the need to ensure <b>participation, accountability, non-discrimination, transparency, human dignity, empowerment and equality, and the rule of law</b> in order to contribute to the progressive realization of the right to adequate food in the context of national food security.</p> <p>*request to recognize the interdependency of human rights as a basic principle at all times, even during crises (CSM)</p> <p>* proposed deletion of the paragraph (Indonesia)</p>	CSM, Indonesia
32-a	<p><b>Systemic, multisectoral, science- and evidence-based approach.</b> Promote a systemic, multisectoral, and science and evidence-based approach that considers food systems in their totality <u>and varied cultural dimensions, appropriately</u> integrates indigenous and traditional forms of knowledge, seeks to <del>simultaneously</del> maximize outcomes across all <del>sustainability</del> dimensions <u>of sustainable development</u>, and looks at the multidimensional causes of malnutrition in all its forms.</p> <p>* request to add a footnote after “forms of knowledge”: “The Global Hub on Indigenous food systems, which will be officially launched at the 27th Session of the Committee on Agriculture, will be an important contributor to provide scientific and evidence-based inputs to approaches aiming at transforming food systems and promoting sustainable food systems, in</p>	EU, USA, Argentina, FAO, CSM

	<p><i>particular when targeting the food systems of indigenous peoples and pastoralists” (FAO).</i></p> <p><i>* request to include also alternative forms of knowledge (CSM)</i></p>	
32-b	<p><b>Coherent and context-specific policies.</b> Contribute to the formulation and implementation of coherent and context-specific policies and related <b>responsible</b> investment through coordinated actions among different actors and across all relevant sectors at international, regional, national, subnational, and local levels.</p>	EU
32-c	<p><b>Accountability, inclusiveness, transparency and participation and resilience.</b> Support efforts in strengthening <b>good</b> governance, <b>including</b> <del>and</del> accountability mechanisms, <del>that contribute to</del> fostering <b>citizen stakeholder</b> participation in national debates on food security and nutrition and on food systems, and transparent and inclusive decision-making processes, <b>that are</b> based on transparent rules of engagement including <del>safeguards against</del> <b>for the identification and management of</b> potential conflicts of interest. <b>Promote and build upon practices that encourage inclusiveness in food systems, ensuring no one is left behind in terms of economic development and food security and good nutrition. Finally, efforts should be made to improve resilient food systems that protect and reinforce ecosystem services.</b></p>	Switzerland, USA, FAO, USA
32-d	<p><b>Healthy and prosperous people, healthy planet.</b> Promote policies and actions that enhance the livelihoods, health, and well-being of the population, as well as sustainable <del>food</del> production and consumption <b>of safe and quality food products to ensure healthy diets and</b> to protect natural resources, <b>biodiversity and</b> ecosystems <del>services and biodiversity,</del> <b>reduce pollution</b> and <del>ensure support</del> mitigation of and <b>ensure</b> adaptation to climate change.</p> <p><i>*request to add reference to resilience (UNN4SUN, CSM)</i>  <i>* request to strengthen the nexus: healthy diets require healthy planet (CSM)</i>  <i>* request to clarify meaning of quality food products, to reinclude reference to biodiversity (Chile)</i></p>	USA, Russia, Switzerland, Norway , UNN4SUN, CSM, Chile
32-e	<p><b>Gender equality and women’s empowerment.</b> <b>Promote equitable access to sufficient, safe and nutritious foods that meet dietary needs and food preferences for an active and healthy life independent of their social or demographic factors such as race, gender, income or geographic region.</b> Promote gender equality and women’s and girls’ empowerment, and respect, protect and fulfill their rights, creating the conditions for women’s <b>equal</b> involvement in decision-making and strong engagement in shaping food systems that improve nutrition, recognizing <del>their women’s key</del> roles in care, education, agriculture, health promotion and food <b>production,</b> preparation, <b>processing</b> and consumption, while promoting gender-equitable practices.</p> <p><i>* request to replace “gender equality” with “equity” in the title (Switzerland)</i></p> <p><i>* request to acknowledge the importance of sharing burden of care and feeding work (CSM)</i></p> <p><i>* request to replace last part of the bullet, from “recognizing” with: “This may entail targeted strategies to support women in their existing key roles as care, education, agriculture, health promotion and food preparation and consumption: However, it</i></p>	WFP, FAO, USA, Switzerland, CSM, EU

	<p><i>also requires change in business as usual to actively engage men and boys to promote nutrition as a joint household responsibility” (EU)</i></p> <p><i>* two additional bullets were suggested, one on resilience, and the other on adequate and innovative financing for nutrition (UNN4SUN)</i></p>	
<b>PART 3 – THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION</b>		
Para 33	<p>With the aim of <i>fostering the achievement of the 2030 Agenda and</i> ensuring the progressive realization of the right to adequate food in the context of national food security, the VGFSyN provide a framework to promote policy coherence and to bring various stakeholders who are involved in food systems to work together to ensure healthy diets for everyone.</p> <p><i>* proposed deletion of the paragraph (Indonesia)</i></p> <p><i>* request to add “sustainable and” before “healthy diets” (EU)</i></p> <p><i>*additional suggested paragraph: “The emergence of Covid-19 and the stress it is putting on food systems around the world underline the importance of sustainable, resilient food systems for food security, health and economic stability. The crisis is a tragic reminder of the importance of trade, the private sector and well-functioning markets, as well as social protection programs for the most vulnerable, including farm workers and workers across the food supply chain. The VGFSyN provide guidance on risk management to minimize potential impacts on food supply and unintended consequences for world trade and food security based on scientific evidence” (Japan)</i></p>	Switzerland, Indonesia, Japan
Para 34	<p>To achieve the <i>2030 Agenda, the World Health Assembly (WHA) and 2030 Agenda and the UNEA Ministerial Declaration</i> targets and national commitments to end malnutrition in all its forms <i>and to safeguard natural resources, a food system approach is needed</i> that recognizes that the various parts that make up food systems are interconnected; that any action or decision to address one aspect of a food system will likely impact other aspects, and that food systems respond <i>to</i> and are impacted by other systems, situations, and contexts. <i>[Thinking systematically and interdisciplinarily] [Applying systems thinking] [toward ensuring sustainable food system transformation-] [about the transformation to more sustainable food systems]</i> can <i>ensure-guarantee</i> that challenges are tackled from multiple perspectives. Thus, the VGFSyN provide guidance on a mix <i>[of regulatory, fiscal, and other]</i> policy actions spanning the diversity of <i>food production</i>, food supply chains, food environment and consumer behavior, as well as the drivers and <i>people-actors</i> that shape those actions.</p> <p><i>* proposal to move this paragraph to 2.3, after paragraph 31 (EU)</i></p>	Switzerland, EU, USA, Australia, Canada, FAO, Argentina

<p>Para 35</p>	<p>These guidelines are structured around seven focus areas: i) transparent, democratic and accountable governance of food systems; ii) sustainable food <del>supplies</del> <u>supply chains</u> for improved diets and nutrition in the context of climate change; iii) equitable access to healthy diets delivered by sustainable food systems; iv) food safety across sustainable food systems; v) social relations, knowledge and culture of diets; vi) gender equality and women’s empowerment across food systems; and vii) resilient food systems in humanitarian contexts. <u>These seven focus areas were identified by CFS stakeholders during the consultation process.</u></p> <p><u>* proposal to move this paragraph after para 36 (EU)</u></p>	<p>Canada, USA, EU</p>
<p>Para 36</p>	<p><del>The HLPE report was structured around three main constituent elements of food systems and proposed a wide number of policy areas and drivers of change (See Figure 1). During the consultation process, CFS stakeholders identified a number of cross-cutting factors that are relevant for improving diets and nutrition and hence the origin of these seven focus areas.</del></p> <p>The first <u>focus</u> area, the governance of food systems, establishes the foundation of the remaining policy recommendations of the VGFSyN. Governance, as a major driver in shaping food systems, is <del>interweaved</del> <u>interwoven</u> across the six other areas. Three <u>focus</u> areas (<u>ii, iii, and v</u>) cover the main components of food systems while an additional <u>focus</u> area (<u>iv</u>) is based on the recognition of the increased importance of collective action in addressing food safety. Special attention is focused on women because of the vital role they play in food systems (<u>focus area vi</u>). The humanitarian context serves as a standalone <u>focus</u> area (<u>viii</u>) because it will continue to be a significant global issue in the context of climate change, protracted crises, conflict and migration.</p> <p><u>* requests were made to amend the graphic with the Food System Framework (Indonesia). Given that this is taken from the HLPE report, it is not possible to make changes. Either we keep it as it is, or we take it out from the Voluntary Guidelines.</u></p> <p><u>* suggestion to move the HLPE diagram to paragraph 34 (USA)</u></p> <p><u>* request to delete the HLPE diagram (CSM)</u></p>	<p>USA, Switzerland, PSM, GAIN, Indonesia, CSM</p>
<p>Para 37</p>	<p>The guidance is principally addressed to governmental actors who should consider it in relation to national and sub-national priorities, needs and conditions, and assess the relevance of the policy [entry points and actions as they pertain to their own] <u>[in each]</u> food system contexts, <u>paying due attention to all direct and indirect costs of environmental, economic and social impacts</u>. It is important for countries to <del>undertake</del> <u>apply</u> a diagnostic lens to their food systems in a systematic and holistic way. This would entail understanding the types of food systems that exist, the make-up and complexity of their food systems, and the major trigger points for change, disruption, exclusion/inclusion and growth. Governmental actors are encouraged to systemically analyze the potential transition costs, benefits, trade-offs, and impacts of their actions, considering their effects across sectors and actors within their own context of environmental, economic and socio-cultural conditions and objectives <u>as well as the effect of knowledge and education on consumer behaviour</u>. <u>Governments are also</u></p>	<p>EU, FAO, USA, Switzerland, WHO, Indonesia</p>

	<p>encouraged to monitor the impact of policy changes to ensure that the implemented policy has the intended result. Though the VGFSyN take evidence from a range of rigorous studies, best practices, and world experience at local, sub-national, and national levels, the generalizability of this evidence to other socio-economic, political, market and environmental situations is not guaranteed.</p> <p>* alternative text for the second sentence: “<i>Relevant diagnostic aspects to consider include the potential effects on growth, disruption and inclusion of the food systems, regarding its nature and complexity</i>” (EU)</p> <p>*proposed deletion of the paragraph as it focuses only on governmental actors, and reference to other actors have been deleted (Switzerland). Important to consider this paragraph was requested by several stakeholders during the last round of comments</p> <p>* request to retain this paragraph and to add text on monitoring of impacts of policy implementation (WHO)</p> <p>* proposal to include an additional paragraph to explain roles of other stakeholders (Indonesia)</p>	
<b>3.1 – TRANSPARENT, DEMOCRATIC AND ACCOUNTABLE GOVERNANCE OF FOOD SYSTEMS</b>		
Para 38	<p>This section lays out the <del>criticality-importance</del> of governance mechanisms, leadership and accountability across the range of actors, from global to local levels, within food systems <b>and for their transformation</b>. Governments are responsible for developing sound <b>and coherent context-specific</b> public <b>[consumer and food industry]</b> policies, and regulatory and legislative frameworks [that govern food systems, promote awareness, and set priorities for impactful action]. Governments also <del>need-should develop transparent mechanisms for evaluating the distribution of transition costs, costs and benefits of policy action across sectors and actors, in order</del> to manage conflicts of interests, power imbalances, and other safeguards to put public interests before other interests <b>and be confident in applying impactful strategies in fostering change</b>.</p>	Indonesia, EU, USA
<b>311</b>	<b>Promoting policy coherence by integrating <b>food systems and nutrition</b> into <b>regional, national and local development</b></b>	Switzerland, EU
311-a	<p>Governmental actors should <b>foster policy coherence across sectors</b> to reduce all forms of malnutrition <b>and food-related environmental pressures</b> from a food system perspective. Governmental actors should <del>prioritize-include</del> sustainable food systems <b>as a priority</b> in order to effectively align relevant sectors around a common set of goals.</p> <p>*request to explicitly mention relevant sectors (Switzerland). These are already mentioned in paragraph 16</p>	EU, USA, Switzerland
311-b	<p>Governmental actors should <b>integrate sustainable food system actions</b> that promote <b>sustainable food systems for</b> healthy diets and <b>improved</b> nutrition into national and local development, health, economic, agricultural,</p>	FAO, USA, Japan, Switzerland,

	<p>climate/environment, and disaster <del>and pandemic diseases</del> risk reduction <del>policies/plans</del>. <del>This integration should be complemented with</del> Governments should consider <b>increased and improved budgetary allocations</b> to <del>actions and policies across</del> food systems <del>activities with that have</del> clear <del>and transparent</del> objectives of improving <del>environment</del>, diets and nutrition with <del>smart</del> indicators to track and assess the <del>[full cost accounting of]</del> <del>[progress in]</del> addressing malnutrition in all its forms.</p> <p><i>* request to replace “improved nutrition” with “healthy nutrition” (Russian Federation)</i>  <i>* request to add “sustainable and” before “healthy diets” (EU)</i></p>	Russia, EU
311-c	<p>Governmental actors should <b>ensure that international and bilateral trade and investment agreements</b> are consistent with <del>[nutrition, food, environment and agriculture national policies]</del> <del>[the objective of transitioning toward more resilient and sustainable food systems]</del>, and <del>international-multilaterally agreed</del> food safety standards (e.g. Codex Alimentarius and World Organization for Animal Health standards <del>and the International Plant Protection Convention</del>) <del>and favour the transition toward more sustainable food systems</del>.</p> <p><i>* proposed deletion of reference to “nutrition, food and agriculture national policies” (Brazil, Australia)</i>  <i>* suggestion to move text in parenthesis (reference to Codex and World Organization for Animal Health standards) to a footnote (Switzerland, Russian Federation)</i></p> <p><i>* alternative text for the paragraph:</i>  a) <i>“Governmental actors should promote increased adoption and use of science-based international food safety standards, guidelines, and recommendations (e.g. Codex Alimentarius and World Organization for Animal Health standards) by governments, food businesses, and other relevant actors” (USA)</i>  b) <i>“Governmental actors should implement science-based policies consistent with international obligations and with nutrition, food and agriculture national policies, and international food safety standards ((e.g. Codex Alimentarius and World Organization for Animal Health standards)” (PSM)</i></p> <p><i>*request to recognize that, while priority should be given to re-localize food systems, trade agreements should favor transition towards more healthy and sustainable food systems and assess how the health, environment, social and economic outcomes of food systems are likely to be affected by such agreements (CSM)</i></p> <p><i>* additional suggested paragraph: “governmental actors should encourage open, transparent, and predictable trade as a means of promoting and addressing food security and nutrition” (Australia)</i></p>	EU, Switzerland, Argentina, Brazil, Costa Rica, Russia, USA, Australia, CSM, PSM
311-d	Governmental actors and intergovernmental organizations should identify opportunities within food systems to <b>achieve</b>	USA, Switzerland,

	<p><b>national and global food security and nutrition goals, and measure progress against targets, and indicators</b> set out by the WHA, <a href="#">UNEA Ministerial Declaration (4, 2019)</a> and the 2030 Agenda for Sustainable Development.</p> <p><i>*Need to ensure consistency between this paragraph and article 2.4 of the WTO Technical Barriers to Trade agreement (Mexico)</i></p> <p><i>* additional suggested paragraph: “Governmental actors should ensure that national health policies include special provisions for complementary actions in primary health care, sanitary services, clean water supplies and other protection against communicable diseases, as well as information and education, that will enhance and reinforce the impact of potentially healthy diets for good nutritional outcomes” (Norway)</i></p>	Brazil, Mexico
<b>312</b>	<b>Strengthening multisectoral and multistakeholder coordination and actions</b>	FAO
312-a	<p>Governmental actors, intergovernmental organizations and development partners should work to <b>improve food systems, nutrition and diets and nutrition across sectors, ministries, and agencies at all levels</b> through strengthened <a href="#">legal policy</a> frameworks and institutional capacities that address the multiple causes and consequences of malnutrition in all its forms <a href="#">and food-related environmental pressures</a>. This coordination should <b>establish and/or strengthen multisectoral, multistakeholder mechanisms, including the establishment of national coordinators and nutrition coordination platforms that can be leveraged to foster coherent policies across different sectors, in line with relevant recommendations and best Multi-Stakeholder Partnerships practices</b> that oversee the design and implementation of evidence- and science-based policies, strategies, and interventions [that contribute to diet and nutrition outcomes <a href="#">and sustainable food systems</a> from national to local levels, <del>adopted in accordance with multilaterally agreed rules with relevant mutually agreed rules</del>].</p> <p><i>*proposal to delete text in the last sentence after “and interventions” (Switzerland)</i></p>	Switzerland, USA, UNN4SUN, EU, FAO, Costa Rica, Indonesia, CSM
312-b	<p>Governmental actors <a href="#">and intergovernmental organizations</a> should <b>facilitate an inclusive and transparent dialogue ensuring and ensure</b> the participation of a range of stakeholders working with or in food systems, including civil society organizations, the private sector, intergovernmental and regional organizations, Indigenous Peoples <a href="#">and local communities</a>, youth, <a href="#">researchers</a>, consumer, <del>and farmer</del> <a href="#">associations, fisheries, and other producer organizations</a>, donors, and development partners. This dialogue should include all dimensions of <a href="#">sustainable</a> food systems, <a href="#">taking into special account the balance of power throughout the food chains, as well as including</a> the protection of natural resources and the environment, <a href="#">as well as social cohesion and inclusion and economic sustainability</a>.</p> <p><i>* request to highlight that governmental actors should take into account imbalance of power when facilitating such a dialogue (CSM)</i></p>	Switzerland, USA, Indonesia, Norway, FAO, EU, CSM

312-c	Governmental actors, intergovernmental organizations, and civil society organizations, <u>development partners and private sector</u> should <b>encourage increased commitment to action with responsible investment</b> from the public sector, private sector actors, and donors to <u>support-ensure</u> sustainable food systems that promote healthy diets, while considering <u>synergies and</u> trade-offs with other policy priorities.	Switzerland, Argentina, EU
<b>313</b>	<b>Creating accountability mechanisms, monitoring and evaluation</b>	
313-a	<p>Where appropriate, governmental actors should establish or strengthen <u>evidence-based policy</u>, regulatory and legislative frameworks to <u>govern-guide, oversee and monitor</u> private and public sector activities related to food systems <u>and nutrition</u>. They should <b>institute robust, inclusive, transparent accountability mechanisms</b> that promote good governance, public deliberation, independent bodies that monitor compliance and performance, individual complaint procedures, remedial actions to improve accountability, systematic management of conflicts of interest [and vested interests, <u>equity</u>, power imbalances,] and capacity to settle disputes that may undermine public health. Governmental actors should ensure that dialogue with <del>the private sector</del> <u>all stakeholders</u> is transparent and follows clear roles and responsibilities for engagement to safeguard the public interest, <u>in line with multilaterally agreed rules</u>.</p> <p><u>* request to delete reference to vested interests and power imbalances (USA)</u></p>	Australia, PSM, USA, Canada, Switzerland, CGIAR, PSM, EU, Argentina
313-b	Governmental actors, in partnership with research organizations, <del>and</del> intergovernmental organizations <u>and private sector</u> , should improve the availability and quality of <b>multisectoral information systems and national surveillance monitoring systems</b> that capture, harmonize and disaggregate data and <u>use as much as possible existing</u> indicators, <u>including SDGs</u> , across all aspects of food systems and outcomes related to food security, diets (particularly dietary intake and dietary quality <u>and access to safe and clean drinking water, nd gender and other relevant social factors</u> ), food composition, and nutrition (including the measurement of micronutrient <u>deficiencies status</u> and anthropometry) for improved policy development and accountability, and better targeting of public programmes. <u>Governments should invest in research to better understand the interconnections between the food, nutritional, economic, social, behavioral and environmental dimensions and thus enable the assessment of the cross-sectional impacts of the policies implemented. It is also necessary to understand the complexity of the interactions between supply and demand at different scales, from farms to households.</u>	GAIN, CSM, FAO, USA, EU
313-c	Governmental actors, [with the support of intergovernmental organizations] <u>and other relevant stakeholders</u> , should <b>promote investment in human, system, development and institutional capacity</b> to analyze food system information in a comprehensive manner to support the planning, monitoring, and evaluation of programmatic actions. <u>Research and knowledge sharing on food systems should also be strengthened, taking into account the need of developing interdisciplinary approach embracing technical, economical and sociological issues.</u>	EU, Indonesia, CSM

	*request to recognize the centrality of the evidence from small-scale food producers, workers, IPs and those who are marginalised, discriminated against and made vulnerable (CSM)	
	<b>3.2 – SUSTAINABLE FOOD [SUPPLY CHAINS] [PRODUCTION AND SUPPLIES] [SYSTEMS] FOR IMPROVED-HEALTHY DIETS AND NUTRITION IN THE CONTEXT OF CLIMATE CHANGE AND NATURAL RESOURCES DEGRADATION</b>	Argentina, USA, Switzerland, FAO, Thailand, Canada, CSM
	* request to replace “improved diets and nutrition” with “sustainable and healthy diets” (EU, CSM)	
Para 39	Food supply [patterns] <u>chains</u> play an important role in [human health and environmental-] sustainability. Food <u>supplies supply chains</u> - from production, storage, processing and packaging, and <u>markets-distribution</u> - operate at assorted scales, structures, and levels, from simple to highly complex <del>and globalized</del> supply chains involving many food system actors. <u>The decisions made by the actors at any stage have implications on the availability, affordability, accessibility, acceptability, and safety of nutritious food for a sustainable and healthy diet.</u> This section complements the goals outlined in the UN Decade of Family Farming and highlights the importance of <u>improving</u> nutrition as food moves through the system, <del>indicates which food system actors should be given special attention,</del> and suggests ways to create resilient food <u>supplies supply chains and sustainable consumption</u> in the midst of climate change and natural resource degradation, <u>[based on common but differentiated responsibilities and respective capabilities principle] [recalling the need to simultaneously take into account the health of individuals, animals, plants and ecosystems in a “One Health” approach].</u>	GAIN, EU, USA, Switzerland, Canada, Switzerland, Indonesia
321	<b>[Prioritizing] [Mainstreaming] climate adaptation and mitigation across food <u>supplies supply chains</u></b>  * alternative title: “ <i>Prioritizing climate adaptation and mitigation across sustainable food supplies chains</i> ” (Switzerland)  * request for this section to make reference to Climate Change Conference/Conference of the Parties 25 (Indonesia)	EU, Canada, Switzerland, Canada, Indonesia
321-a	Governmental actors (including <del>national</del> <u>extension services</u> ), development partners, <u>research organizations, civil society and</u> NGOs, and private sector actors should <u>assist support and collaborate with</u> [farmers and other] food producers <u>[to achieve decent livelihoods, to adapt to, and ensure enhance the resilience of food supply chains are resilient to, climatic shocks].</u> <del>by</del> <u>[to optimize agricultural productivity while safeguarding health of ecosystems in the face of climatic shocks].</u> <del>Through actions that manageing risk and building preparedness, and resilience can be enhanced. Assistance</del> <del>These</del> can include <u>[facilitation of the] [increasing] access to finance, insurance, extension services, weather forecasting data and methods, early warning systems and capacity development and knowledge transfer and immediate help through service apps (e.g. to identify plant diseases and parasites) and research on an promotion of production systems and commodities, including local varieties of crops and animasls, that are resilient to climate change. Assistance <del>They</del> could also include <u>access to services for</u> protecting crops, livestock, and fisheries and overall production systems from the anticipated impacts of climate change in the form of pests, diseases, weather-related shocks, <u>such as through cover crops, no-till</u></u>	EU, Norway, FTA, CGIAR, Switzerland, USA, FAO, Brazil, New Zealand

	<p>farming and renewable energy technologies, and adopting drought resistant and salt-tolerant varieties, as well as productive-asset creation initiatives (e.g. rehabilitating degraded land and infrastructure development, irrigation).</p> <p>* request to emphasize role of nutrition sensitive agriculture as an approach to agricultural development that puts nutritionally-rich foods, dietary diversity and food fortification at the centre of overcoming nutrition (New Zealand)</p> <p>* alternative text for the last sentence: “It should include support to implement evidence-based response options to climate change adaptation and mitigation as well as to ensure food security, including increased food productivity, agroecology and other innovative approaches, agroforestry, and agricultural diversification, and improving cropland, livestock, and water management. This could entail disseminating good practices of resilient farming systems by locally adopting drought resistant varieties, integrated pest management, service applications, as well as reducing post-harvest losses and developing productive-asset creation initiatives” (EU)</p> <p>*suggestion to move this recommendation after recommendation 321.b (EU)</p>	
321-b	<p>Governmental actors, intergovernmental organizations, NGOs, and private sector actors should collaborate to support <del>and assist</del> farmers and other food producers to <b>reduce the environmental impact</b> of food systems. This could be done by fostering the adoption of appropriate sustainable technology and on-farm management practices to <del>improve</del> ensure enough crop production yields and <del>[reduce]-[mitigate the negative impact of]</del> <del>[ensure appropriate]</del> <del>[ensure sustainable use/management of pesticides]</del> <del>[improve efficiency of fertilizer and]</del> pesticide usage, <del>[and prevent inappropriate use and overuse of fertilizers]</del> <del>[reduce pesticides and chemical fertilizers]</del>. Governmental actors should promote optimization of agricultural outputs per unit of water, energy, soil and land, manage the carbon footprint, and reduce greenhouse gas emissions <del>[including in the livestock sector]</del>, biodiversity loss, and natural resource degradation <del>[including deforestation]</del> <del>of related to</del> agriculture activities, in accordance with their Nationally Determined Contributions to the Paris Agreement, and other relevant national planning instruments.</p> <p>Alternative text for the first sentence: “Governments, intergovernmental organizations, NGOs, and private sector should promote sustainable agriculture, agroecology and other innovative approaches at different scales (local, territorial, national, regional and global) in order to make a transition pathway towards sustainable food systems that enhance food security and nutrition [footnote referring to HLPE report on agroecological and other innovative approaches]. They also should support and assist farmers and otehr food producers to reduce the environmental impact of food production systems enhancing also biodiversity gains in agriculture” (EU)</p>	Switzerland, Brazil, FAO, Canada, Chile, USA, Australia, Russia, EU, IPES-FOOD, CSM, Thailand, Indonesia

	<p><u>* request to add reference to agroecology (IPES-FOOD)</u></p> <p><u>* request to refer to need for technologies to adhere to real needs, be demand-driven and locally adapted, rather than be promoted by a supply-driven approach (CSM)</u></p> <p><u>* request to refer to the minimization of food losses in the second sentence (Thailand)</u></p> <p><u>* with regards to the proposed addition in the last sentence, request to delete reference to Nationally Determined Contributions: “Through NDCs, countries sovereignly define in which sectors and how they intend to reduce their GHG emissions. The Paris Agreement does not define any economic or productive sector in which countries should act as a priority to mitigate GHG emissions, as it understands that it depends on the reality and opportunity costs for each country” (Chile).</u></p> <p><u>* request to replace last sentence with “governmental actors should promote optimization of good agricultural practices” (Indonesia)</u></p>	
321-c	<p>Governmental actors should <b>institute <del>surveillance-monitoring</del> systems</b> (including early warning systems), quality indices ([e.g. integrated diversification and agro-biodiversity targets] <u>[soil, health and water quality]</u>) <u>farm income, food price,</u> and other food system and dietary metrics <u>as part of environment and climate-related target-setting agendas</u> to monitor changing conditions and the effectiveness of policy responses.</p> <p><u>*request to specify connection with climate change adaptation and mitigation (Canada)</u></p> <p><u>*proposal to move this paragraph under 322 (Brazil)</u></p>	EU, USA, Russia, Switzerland, Canada, Brazil
321-d	<p>Research organizations, academic institutions, and universities should promote the <b>generation and use of rigorous robust science and evidence</b> that demonstrate <u>robust-climate change</u> mitigation and resilience strategies <u>to climate change</u> for sustainable food systems and sustainable <u>and</u> healthy diets. Research should focus on potential interventions and policy entry points to ensure agricultural <u>and food</u> production, processing and packaging, retail and markets, and consumer <u>demand behavior</u> contribute to <u>support food producers in their efforts to adapt</u> to climate change, mitigate their impact, and reduce <u>environmental footprint and respect</u> natural resource <u>degradation</u>. <u>In particular, special attention should be paid to efforts to reduce and eliminate use of plastics within food systems.</u></p> <p><u>* alternative suggested text after “consumer demand”: “are adaptable to climate change, disasters, and other disruption.” (USA)</u></p>	EU, USA, FAO
<b>322</b>	<b><u>Ensuring Promoting</u> sustainable use and management of natural resources <u>and biodiversity</u> in food production</b>	USA, FAO, CSM

	<p>* request for this section to include reference to the need to protect agricultural biodiversity and people's bioculturality (CSM)</p>	
322-a	<p>Governmental actors, <del>intergovernmental organizations, and farmers and their organizations</del> agricultural producers, private sector, should <b>address soil health</b> as central to agricultural production systems. Governmental actors should encourage the use of integrated soil fertility <del>and nutrient</del> management practices to maintain and increase crop [productivity] [production] in a sustainable <del>way</del>manner, and <del>provide appropriate incentives for</del>promote the use of sustainable land management, <del>ecosystem</del> services and agricultural practices to maintain soil biodiversity, <del>water management</del> and nutrient balance and promote carbon storage <del>and sequestration, primarily through humus-upbuild, with due attention to the FAO Voluntary Guidelines for Sustainable Soil Management. Scientific evidence also demonstrates that well-adapted plant nutrient management can increase the health-promoting components of plant-based food and feed.</del></p>	WFP, FAO, EU, FTA, Brazil, Argentina, USA, Switzerland, Norway, PSM
322-b	<p>Governmental actors, <del>intergovernmental organizations, and private sector,</del> should <del>improve</del><b>ensure the sustainable management, and control and sustainable use of water resources</b> for agriculture and food production, <del>especially considering freshwater fisheries and aquaculture,</del> through <del>– where appropriate -</del>improved regulation, [<del>integrated water resoruces management at watershed scale</del>] community participatory approaches, <del>market-based approaches,</del> and water stewardship approaches. <del>Such approaches should consider the multiple uses of water, promoting the safe, environmentally sound use of water for domestic purposes as well as production while reducing water wastage and pollution. These efforts that should involve civil society organizations, private sector actors, and other stakeholders and that take into account the variety of water needs across different sectors. [A systems approach to water resource management should include expanding watershed protection and restoration to improve water quantity and quality] [These approaches should foster the reduction of water wastage in irrigation, ensure the systematic use of appropriate water-saving technologies, minimize water pollution stemming from agriculture, and promote the multiple uses of water (including wastewater) without compromising the ability of farmers and food producers to grow sufficient, nutritious food]</del></p> <p>*suggestions to add reference to FAO Voluntary Guidelines for Sustainable Soil Management (2016) (FAO)</p>	WFP, CGIAR, EU, Switzerland, USA, FAO
322-c	<p>Governmental actors, <del>intergovernmental organizations, and private sector,</del> should <del>mainstream biodiversity,</del> <b>foster healthy ecosystems through the protection, conservation, and sustainable use</b><del>management of biodiversity</del> <b>of relevance to food and agriculture, productive systems</b> at ecosystem, species and genetic levels, <del>that include</del> <del>ing</del> <del>diverse</del> crops and livestock <del>biodiversity, (inlcuding that of neglected and underutilized species),-forest-tree biodiversity, the biodiversity of fished and farmed aquatic organisms, and the biodiversity that underpins food and agricultural production (including forestry, fisheries and aquaculture) by providing services such as pollination, pest control and nutrient cycling. Biodiverse productive landscapes including rangelands, trees,/seascapes that include, as appropriate to local</del></p>	FAO, WFP, EU, Japan, USA, Chile, CSM, New Zealand, Switzerland

	<p>circumstances, croplands, pastures, forests and plantations, fisheries, fish farms and a diverse range of other habitats should be fostered. <del>forestry and plantations, fisheries and sustainable aquaculture as well as biodiverse landscapes including forests, water and coastal seas.</del> This should be complemented through the adoption and application of sustainable food production and natural resource management practices including <u>organic agriculture as well as agroecological and other innovative approaches, including digitalization,</u> in a manner that is <u>biodiversity-friendly and economically viable</u> <del>for</del> <u>[in terms of allowing</u> all legitimate tenure rights holders to uphold those rights and maintain livelihoods,<u>] and respectful of the environment.</u> <u>Biodiversity should be mainstreamed into policies, programmes and national and regional plans of action on nutrition and into national climate change adaptation planning.</u></p> <p><u>*request to add a footnote in the first sentence referring to CFS recs on sustainable forestry (EU)</u>  <u>* request to delete reference to agroecological and other innovative approaches (USA) – request to keep this reference (Chile)</u>  <u>* request to separate reference to “agroecological approaches” from “other innovative approaches” (CSM)</u>  <u>* request to delete reference to “all legitimate tenure rights holders to uphold those rights and maintain livelihoods” (USA)</u>  <u>* request to further emphasize need to minimize deforestation from food production (New Zealand)</u></p> <p><u>*alternative language for the paragraph is suggested: “governmental actors and other stakeholders should protect, conserve, through sustainable use biodiversity for food and agriculture (BFA)” (Switzerland)</u></p>	
322-d	<p>Governmental actors should <b>protect the rights of Indigenous Peoples, <del>small-scale producers, peasants, and other local communities</del></b> with customary tenure systems that exercise self-governance of land, fisheries and forests, <del>to land,</del> territories, and resources they have traditionally owned, occupied or otherwise used or acquired. <del>Their</del> <u>The livelihoods should be maintained, their</u> traditional, collective knowledge and practices <u>of these right holders</u> should be [valued] [respected], their access to traditional food should be protected, and <del>their preservation of traditional</del> diets, nutrition, and wellbeing should be [prioritized] <u>[taken into consideration consistent with national and international law.</u></p> <p><u>*alternative first sentence: “Governments should respect and protect tenure rights, including customary rights systems of Indigenous Peoples, small-scale producers, family farmers, peasants, and other local communities in line with the VGGT” (EU)</u>  <u>*request to add footnote with reference to UN Declaration on the Right of Indigenous Peoples (FAO)</u>  <u>*request to include need to support Indigenous Peoples and local communities to ensure that their food production systems can be maintained, in particular within the climate crisis context (CSM)</u></p>	Switzerland, USA, FAO, EU, CSM
323	<b>Promoting nutrition within agriculture and food <del>productions</del>supply chains</b>	EU
323-a	Governmental actors should <u>promote nutrition-sensitive agriculture and diversify food production and integrate and</u>	Switzerland, EU,

	<b>budget for nutrition [objectives] [considerations] and indicators into their national food, agriculture, [and other relevant] [education, health, and water] policies, including through incentives.</b>	CGIAR, Indonesia, Canada
323-b	<p>Governmental actors, private sector actors, [development partners and donors] should <del>diversify-encourage</del> <b>responsible</b> agricultural investment and incentivize <del>all types and sizes of food</del> producers, <del>particularly smallholders and/or family farms and local supply chain actors</del>, to <b>shift emphasis from producing high quantities of a few crops and food toward the adoption of sustainable production practices and to the production of a diverse range of, nutritious crops and plant and animal-based food</b>, in line with planetary boundaries, that contribute to healthy diets, [while ensuring a decent income,] [and provide support for] livelihoods and resilience for farmers, particularly smallholders and/or family farms, and farm workers <del>as well as protection, conservation and sustainable use of ecosystems</del>. [This should include supporting and encouraging the production of nutritious plant-based food,- sustainable crop production practices, <del>sustainable</del> livestock, agroforestry, healthy and sustainable animal and fishery systems (including artisanal fisheries and aquaculture).] <del>Agroecological and other innovative approaches can be valuable tools in this regard. In regions with family and subsistence agriculture, agriculture needs to be performed taking into account the Right to Food approach, the UN Declaration on the Rights of Indigenous Peoples, the UN Decade of Family Farming (2019-2028) as well as relevant internationally agreed instruments (e. g. The Paris Agreement and its Nationally Determined Contributions (NDCs).</del></p> <p><i>* request to add “sustainable and” before “healthy diets” (EU)</i></p>	EU, WFP, Thailand, FAO, Indonesia, WWF, Switzerland, USA
323-c	<p>Governmental actors should <b>integrate urban and peri-urban agriculture</b> and urban land use into national and local <del>agricultural food systems and nutrition</del> development strategies, <del>food and nutrition and</del> programmes, <del>and as well as</del> urban and territorial planning, as a viable input into healthy diets for growing urban populations and social cohesion of communities.</p> <p><i>* request to refer to “sustainable and healthy diets” (Switzerland, EU)</i></p>	Switzerland
323-d	<p>Governmental and private sector actors, <del>and intergovernmental organizations</del>, should ensure enabling environments to assist and ensure <del>farmers and other</del> food producers have <b>equitable access to modern-affordable, innovative and sustainable technologies and practices, technical assistance, business models, and nutrition information within agriculture and other extension technical packages</b>, and provide skill training and capacity development to be able to use those technologies/assistance/information that could improve the <del>sustainable</del> production, <del>and safety, and of nutritional</del> <b>high-quality of crops-plant and animal-based food</b> for markets, <del>while protecting biodiversity, soil health and other ecosystem services</del>.</p>	WFP, EU, CGIAR, FAO, Switzerland, PSM, IPES-FOOD, CSM

	<p><u>* request to recognize agroecology as technical innovation that cuts across social, environmental and health dimensions (CSM)</u></p>	
323-e	<p>To reduce excessive food price volatility, governmental actors <u>and intergovernmental organizations</u> should <b>promote market information systems</b> that <u>equitably</u> provide timely, transparent information about food-related market transactions, <u>including enhanced tracking of current and future food supply stock and price data. Further monitoring and market studies [with more emphasis] on [nutritious] [underreported] commodities [with major impact on nutrition] and [orphan] [neglected and underutilized] crops should be developed, including enhanced tracking of current and future food supply stock and price data.</u></p>	WFP, CGIAR, IPES-FOOD, EU, USA
323-f	<p>Governmental actors, <u>intergovernmental organizations</u>, private sector actors, donors and other relevant stakeholders should <b>invest in systemic, multidisciplinary research, development knowledge transfer, and innovation and scale-up</b> for <u>producing the production of a wide variety of nutritious and diversified</u> crops, such as <u>whole grains</u> fruit, vegetables, nuts <u>[and seeds]</u>, legumes, biofortified crops <u>[(developed through conventional on-farm breeding)]</u>, <u>high-yield and pest resistant varieties</u>, and diverse animal-source food and breeding (e.g. dairy products, fish, eggs, <u>and</u> meat, <u>edible insects</u>), which are developed keeping smallholder and/or family farmers' livelihoods in mind.</p> <p><u>* suggested deletion of reference to biofortification (Switzerland)</u></p> <p><u>* request to delete text in parenthesis: "(developed through conventional on-farm breeding)" (Canada, USA, New Zealand, WHO)</u></p> <p><u>* alternative text for last sentence: "Where appropriate this can be complemented with the breeding of crops to increase their nutritional value or the sustainable production of diverse animal-source food (e.g. dairy products, fish, eggs, and meat), which are developed keeping in mind smallholder and/or family farmers' livelihoods" (EU)</u></p> <p><u>* additional paragraph suggested by UNICEF: Establish and leverage institutionalized public private sector initiatives to fortify staple foods and condiments with essential vitamins and minerals to address hidden hunger and fill important micronutrient gaps in women and children. This must be coupled systematically with the promotion of micronutrient rich diverse foods including biofortified foods.</u></p> <p><u>* request to add a paragraph on the need to develop local food specifically using local resources (Indonesia)</u></p> <p><u>* request to add a paragraph: "Governmental actors should support value chain development that links smallholder farmers, and the informal food production sector, directly to the formal local, regional and international food processing and</u></p>	WFP, FAO, EU, UNICEF, Switzerland, Canada, WHO, USA, New Zealand, Thailand

	<i>packaging sector thus providing smallholder farmers' increased income, improving the accessibility of local &amp; traditional food supply whilst improving and safeguarding food safety, sustainability and nutritional value of foods" (PSM)</i>	
324	<b>Improving food storage, processing, <del>packaging</del>, transformation <del>and</del> reformulation and handling and transport</b>	Switzerland, Thailand
324-a	<p>Governmental actors, <u>intergovernmental organizations</u>, private sector actors, and donors should <b>invest in infrastructure</b> (e.g. storage facilities, roads and bridges, <u>cold chain</u>, physical markets, <u>electricity</u>, market information systems) <u>and logistical support</u> to prevent postharvest loss <u>and waste</u> and <del>ensure support</del> smallholder farmers <u>and fishers</u>, and small and medium-size enterprises (SMEs) <del>are able</del> to deliver diverse, perishable, safe food to markets in sustainable ways., <u>and to support and maintain livelihoods of smallholders</u></p> <p><i>* additional paragraph is suggested: "Governmental actors should also invest in transportation and road infrastructure to ensure the production of smallholder farmers are able to reach markets. These supply chain investments should be complemented with improved and accessible information technology, training and capacity building to increase farmers' opportunities to deliver diverse, perishable, safe and nutritious food to market and for consumers to access those markets." (Switzerland)</i></p>	WFP, FAO, Costa Rica, Philippines, USA, Canada, EU, Switzerland
324-b	<p>Governmental actors, <u>intergovernmental organizations</u>, private sector actors, and <del>farmers</del> <u>food producers</u> and their associations should <b>facilitate-promote minimizing food and nutrient loss</b> on farms, during post-harvest storage, and throughout processing, transportation, and retail (particularly <u>to improve the shelf-life and food safety [of] [for]</u> perishable foods such as fruits, vegetables, dairy, eggs, fish and meat). <del>Facilitation</del> <u>This</u> includes training and capacity <u>building and research investments on-to</u> improved management practices and <u>fostering</u> the adoption of appropriate technologies, <u>as well as the planning of production according to demand and promotion of local markets to shortern circuits. An extra effort has to be made to quantify and investigate how to lessen food loss and waste in the food storage, processing, transformation and reformulation stages.</u></p> <p><i>*request to add reference to reduction of food waste in the first sentence (Switzerland)</i></p>	WFP, FAO, EU, Switzerland, USA, Canada
324-c	<p>Governmental actors should <b>establish guidance on the use [and scale-up] [support research, development and scaling-up] of sustainable processing and packaging technologies and practices and access to processing technologies by farmers and food-related businesses</b> that can <u>retain or</u> improve the nutrient content of food, minimize post-harvest nutrient losses, and promote longer-term storage of food, particularly during periods of drought, flooding, and insufficient production. <u>Governmental actors should set guidelines for and monitor the level of processing as highly-processed food are interlinked with unhealthy diets, overweight and obesity.</u></p>	Switzerland, USA, PSM, FAO, EU, Australia, WFP, WHO

	<p><i>*request to move text of footnote to the end of the paragraph: “Technologies include flash and solar drying, converting food to pastes and spreads, appropriate packaging to preserve nutrient content, and post-harvest fortification of food vehicles with micronutrients that are beneficial to health. Food fortification should be guided by national standards, with quality assurance and quality control systems to ensure quality fortification” (WFP, WHO)</i></p> <p><i>*additional paragraph is suggested: “governmental actors should adopt strong measures that reduce the overall impact on children of marketing of foods high in energy, saturated fats, trans fats, sugar or salt” (Switzerland) – it is important to consider that marketing to children is addressed in 3.5</i></p>	
324-d	<p>Governmental actors should <b>[promote guidelines, regulatory instruments and] [develop strategies or] incentives</b> to promote reformulation, complemented with appropriate measures such as front-of-pack labels (FOPL), <b>[providing relevant nutritional information in accordance with agreed Codex Alimentarius standards]</b> and <b>[taxes]</b> to minimize the <del>promotion</del><b>consumption</b> of foods <b>[high in energy density with minimal nutritional value, (such as foods] high in sodium, in free sugar, and in trans and/or in saturated fats)</b>, in accordance with <b>[World Trade Organization (WTO) rules] [multilateral rules and WHO recommendations]</b>, to facilitate healthy food choices.- <b>Any FOPL system should be easy to understand, objective, fact- and evidence-based.</b></p> <p><i>* alternative text suggested by Indonesia, Malaysia, Japan,-and USA (deletion of references to FOPL and taxes):</i></p> <p><i>a) “Governmental actors should <b>promote regulatory instruments and incentives</b> to promote reformulation, complemented with appropriate measures” (Indonesia)</i></p> <p><i>b) “Governmental actors should promote and implement policy, legislative, and regulatory measures, including fiscal measures as appropriate, aiming at minimizing the impact of the main risk factors for NCDs, and promote healthy diets and lifestyles, in accordance with WTO rules” (Japan)</i></p> <p><i>c) “Governmental actors should support and collaborate with industry on reformulation, while considering labelling and other mechanisms for promoting food choices consistent with national dietary guidelines, taking into account evidence on the cost-effectiveness of the policy in the context of local socio-economic and market conditions” (USA)</i></p> <p><i>* request to keep reference to FOPL (Chile)</i></p> <p><i>* request to delete reference to taxes (Russian Federation, Costa Rica) + proposal to replace “taxes” with “measures to promote the consumption of nutritious foods” (EU)</i></p> <p><i>*request to delete “high in energy density with minimal nutritional value (such as foods” (EU)</i></p>	EU, Canada, Brazil, Indonesia, Japan, Malaysia, USA, PSM, Chile, Mexico, Russia, Costa Rica, Philippines, CSM

	<p>* request to delete text in parenthesis in last sentence: <i>“(such as foods high in sodium, sugar, and trans and/or saturated fats)”</i> (Philippines)</p> <p>* concerns expressed for the references to “reformulation” and for the lack of references to “fresh foods” and to “unprocessed/processed food” (CSM)</p>	
324-e	<p>Private sector actors <u>in the food processing sector</u> should <del>strive to meet</del> <b>contribute to public health goals aligned with national food-based dietary guidelines</b> by <del>further</del> producing and promoting nutritious foods <del>and food products that are produced sustainably and</del> that contribute to <del>a</del> healthy diets, <del>such as</del> increasing and preserving nutrient content <u>through staple crops/food fortification</u> and making efforts to reformulate foods, <del>when necessary</del>, by reducing the <del>excessive</del> content of sodium, sugar, and saturated fats, and eliminating <u>industrially-processed</u> trans fats in foods.</p> <p>* suggestion to move this paragraph to 332 (WFP)</p> <p>* request to refer to “dietary guidelines” rather than “food-based dietary guidelines” (Canada, USA)</p> <p>*proposed deletion of references to sodium, sugar, etc (Malyasia, Philippines)</p> <p>* suggestion to make reference to “<i>industrially produced trans fat</i>” rather than to “<i>trans fat</i>” (Australia, Chile, USA) + remind that WHO recommends eliminating “<i>industrially-produced trans-fatty acid</i>” (New Zealand)</p> <p>* request to ensure consistency with paragraph 20 of VGFSyN, eliminate or reduce trans fats in food? (Mexico)</p> <p>*alternative text suggested: <i>“Private sector food and beverage actors should strive to meet public health goals by reformulating food to ensure less nutritious ingredients – such as sugars, salt/sodium and unhealthy fats such as trans fats – are minimized or eliminated in food and beverage products and nutritious ingredients such as fibre, and other health promoting ingredients are increased”</i> (Switzerland)</p> <p>*additional paragraph is suggested: <i>“Governmental actors should incentivize private sector food actors to work towards more sustainable and safe packaging of products such as nanotechnology, waxing, plant-based wrapping, and biodegradable plastics. Furthermore, governmental actors should institute regulatory instruments to promote reformulation, complemented with warning labels and taxes on less nutritious and sustainably produced food products that do not adhere to national food-based dietary guidelines”</i> (Switzerland)</p>	EU, Indonesia, USA, Argentina, Malaysia, Philippines, WFP, WHO, PSM, Switzerland, Canada, USA, Australia, Chile, New Zealand, Mexico
<b>325</b>	<b>Improving nutrition and health of farm and food system workers</b>	
325-a	Governmental actors should <b>ensure that the right to <del>decent</del> work</b> is respected, protected and fulfilled for <u>all</u> farmers and other food producers and workers (including migrants and undocumented workers), that these populations are protected	Canada, Mexico, EU, Switzerland,

	and safe, and that there is no [unnecessary burden or undue labour (including child <del>slavery</del> labour)-which could negatively impact their health status] [unnecessary burden” with “no hazardous conditions, inappropriate division of tasks, including involvement of children in harmful tasks (e.g. child labour)], and take appropriate measures aiming at ensuring that food prices guarantee a living income for them.	USA, FAO
325-b	Governmental actors, <u>intergovernmental organizations</u> , and private sector actors should <b>provide social protection</b> <del>when necessary</del> to food producers and workers to ensure they are food secure, have living wages and sufficient livelihoods, and can <u>physically</u> access <u>and afford</u> healthy diets and adequate health services.  <i>*request to add “sustainable and” before “healthy diets” (EU)</i>	WFP, EU
325-c	Private sector actors should strive to <b>improve the nutritional status of workers</b> , increase their access to [nutritious foods <del>associated with</del> ]-[healthy diets] in <del>or through</del> the workplace, and encourage the establishment of facilities for breastfeeding.  <i>* request to make reference to food system workers (USA)</i>  <i>*request to add “sustainable and” before “healthy diets” (EU)</i>	Switzerland, USA, EU
<b>326</b>	<b>Empowering youth across food systems</b>	
326-a	Governmental actors, intergovernmental organizations, and private sector actors should <u>acknowledge the group of youth in their diversity and</u> engage and empower youth <u>to be actively involved in food systems</u> by <b>removing obstacles and enhancing their access</b> to land, natural resources, inputs, tools, information, extension and advisory services, financial services, education, training, markets, and <u>promote their</u> inclusion in decision-making processes in accordance with national legislation and regulations.	EU, Indonesia, Switzerland, USA, Russia
326-b	Governmental actors, <u>intergovernmental organizations</u> , private sector actors, non-governmental organizations, and communities should <b>invest in appropriate vocational training, formal education, like skills training, and mentorship programmes</b> for youth to increase their capacity and access to decent work and entrepreneurship opportunities-to stimulate <del>the transition</del> <u>pathways</u> toward sustainable food systems for the next generation.  <i>* alternative last sentence after “opportunities”: “Governmental actors, private sector actors, non-governmental organizations, and communities should also explore and incentivize the diversification of education products in service education markets to enable rapid uptake of decent work opportunities by young people in agriculture and supporting markets, particularly among rural smallholders moving from subsistence agriculture to commrcialization” (USA)</i>	WFP, Indonesia, EU, Brazil, USA

326-c	<p>Governmental actors, <u>intergovernmental organizations</u>, and private sector actors should <b>promote development and access to <u>sustainable-social innovation practices</u>, resource hubs, and new technologies</b> for youth along food supply chains that enhance <u>the sustainability of food systems</u>, nutrition and <del>support</del> social enterprises <u>and entrepreneurship of youth</u> (particularly in countries experiencing high rates of youth internal and external migration), <u>especially to attract and enable youth to be drovers of improvement toward sustainable food systems</u>.</p> <p><u>* additional paragraphs are suggested:</u></p> <p>a) <u>“Government actors, private sector actors, non-governmental organizations, and communities should <b>take relevant measures to ensure due diligence in food systems and protect children and youth from hazardous work and inappropriate work burden many children and under-age youth shoulder in rural areas because of food insecurity, which leads to undernutrition and wasting</b>” (FAO)</u></p> <p>b) <u>“Governmental actors, intergovernmental organizations, and private sector should support <b>indigenous peoples youth organizations</b>, in particular by providing them with intercultural programmes that enable them to protect the transmission of their traditional knowledge in relation to food systems and climate change; intercultural education; and job opportunities” (FAO)</u></p> <p>c) <u>“Conduct research and strengthen the evidence base for effective ways to ensure young people’s own nutrition and youth roles as change agents and influencers in achieving downstream nutritional impacts” (USA)</u></p> <p>d) <u>Governmental actors, private sector actors, non-governmental organizations, and communities, should support youth addressing their own nutritional needs and strengthen the roles youth play as change agentt, influencing the consumption of healthy diets within societies both as contributors in food systems and as influencers in their households and communities” (USA)</u></p> <p>e) <u>“All actors should help showcase profitable ventures and businesses across food systems to give incentives for youth to engage in entrepreneurial opportunities in this sector” (PSM)</u></p> <p><u>*additional sub-section is suggested: “Making markets work for nutrition” (Switzerland)</u></p>	WFP, USA, EU, IPES-FOOD, Switzerland
3.3 - <b>EQUITABLE EQUAL ACCESS TO HEALTHY DIETS DELIVERED BY SUSTAINABLE FOOD SYSTEMS</b>	<p><u>* requesto to add “sustainable and” before “healthy diets” (EU)</u></p> <p><u>* request to review this section to incorporate role of consumer behaviour (New Zealand)</u></p>	EU, USA, New Zealand
Para 40	Food environments comprise foods available and accessible to people in their surroundings <u>or through online markets</u> and	USA, Canada, EU,

	<p>the nutritional quality, safety, price, convenience, labelling and promotion of these foods. These environments should <del>ensure that provide</del> people <del>have with equitable equal</del> access to sufficient, safe and <u>sustainably produced</u> nutritious foods that meet dietary needs and food preferences for an active and healthy life, <u>and considering</u> the various physical, social, economic, cultural, and political factors that influence that access. For many people, access to healthy diets can be <u>problematic a challenge</u> as they may not be available, accessible, or affordable for a variety of reasons. This section outlines the potential policy entry points to improve physical and economic access, and availability of healthy diets within sustainable food systems, <u>including in</u> the places where people shop, choose, and eat food.</p> <p><u>* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</u></p>	Switzerland
<b>331</b>	<p><b>Improving access to food that contributes to healthy diets</b>  <u>* request to add “sustainable and” before “healthy diets” (EU)</u></p>	EU
331-a	<p>Governmental actors should improve the availability <u>of</u> and access <del>of to</del> nutritious food that contributes to healthy diets <u>including</u> through <u>the promotion of free and open trade and investment agreements and policies</u>, in accordance with <u>relevant international law</u>, WTO and multilaterally agreed rules, <u>ensuring no negative impact on and use such agreements to ensure</u> the progressive realization of the right to adequate food in other countries. <u>Open and inclusive trade contributes to global food security, including access to sufficient, safe and nutritious foods by reducing unnecessary costs involved in getting nutritious foods to consumers, thereby making these foods cheaper; and increasing the volume and variety of nutritious foods available.</u></p> <p><u>*proposed deletion of this paragraph (Brazil, USA)</u>  <u>* concerns expressed on the presence of reference to trade and investments agreements and policies as first paragraph of this section (CSM)</u>  <u>* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</u>  <u>*request to move it down as bullet 331.e (Switzerland)</u></p> <p><u>* proposed additional paragraph: “Governmental actors should take into consideration the guidance developed by FAO and WHO to ensure that in times of crisis, e.g. pandemics, the integrity of the food chain is maintained, and adequate and safe food supplies are available for all people” (PSM)</u></p>	Thailand, Canada, Switzerland, New Zealand, EU, Brazil, USA, CSM
331-b	<p>Governmental actors should <u>[take equity into consideration an equity lens</u> when <del>investing in actions</del> <u>acting to]</u> address food environments and ensure members of <del>historically marginalized and</del> vulnerable communities <u>and people, including women, youth, residents of low income communities</u>, Indigenous Peoples, peasants, <u>pastoralists, small-scale fisherfolks,</u></p>	USA, CGIAR, FAO, Switzerland, CSM, IPES-FOOD, EU,

	<p><del>people facing physical constraints due to age, illness, or disability</del>, and other people living in rural areas, and people facing physical constraints due to age, illness, or disability, have sufficient access <del>and ownership</del> to/of diverse food <del>that contribute to healthy diets, markets</del> in accordance with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), UNDROP and other relevant international instruments.</p> <p><i>*proposed deletion of “take into consideration an equity lens when investing in actions to” (EU)</i>  <i>* proposed deletion of reference to UNDRIP (Indonesia, Canada, USA)</i>  <i>* proposed addition of reference to UN Decade of Action of Family Farming after UNDRIP (EU)</i></p>	Indonesia, Canada
331-c	<p>Governmental actors should <b>minimize physical barriers</b> so that people can grow, <del>transport, preserve</del>, purchase, order or <del>eat otherwise access</del> diverse types of foods, <u>including fresh foods</u>, that contribute to healthy diets in a given food environment. This can be done by <u>facilitating internet access and innovative service delivery or</u> instituting rural and urban planning policies that encourage <u>the growth of</u> retail outlets <del>that to</del> sell <u>a variety of</u> affordable nutritious foods that contribute to healthy diets, and that restrict, <u>if necessary</u>, the growth of retail outlets which sell an overabundance of foods <u>[high] [excessive]</u> in energy density with minimal nutritional value, and promote <u>local and seasonal, homes, community, and school</u> food production and gardens, where appropriate. <u>Evidence of cost-effectiveness of such policies in the context of local socio-economic and market conditions should be considered.</u></p> <p><i>*suggested deletion of last part of the paragraph from “and that restrict the growth...” (PSM, USA)</i>  <i>*suggested deletion from “and that restrict the growth” until “minimal nutritional value” (EU)</i></p> <p><i>-* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</i></p>	USA, WFP, Switzerland, FAO, Japan, New Zealand, EU, Canada, PSM
331-d	<p>Governmental actors should, <u>[in accordance with international trade regulations and WTO rules] [where appropriate to national circumstances]</u>, <b>encourage zoning laws, certifications and tax incentives, if necessary</b>, for farmers markets, <u>fisher markets</u>, mobile food retailers, street food vendors and other <del>alternative</del> retailers that sell <u>a variety of nutritious foods, both locally grown and globally sourced</u>, that contribute to healthy diets <del>in low income areas</del>, and reduce the concentration of vendors that sell foods <u>[high] [excessive]</u> in energy density with minimal nutritional value <u>in all areas, and especially in low-income areas, where appropriate.</u></p> <p><i>*concerns expressed regarding zoning laws and tax incentives (USA, EU) – request to delete references to taxes (Costa Rica)</i>  <i>* alternative text for the last part of the para, after “low income areas” is suggested: “These incentives should be accessible to retailers that follow general hygienic practices required to be followed to make the street food safe” (USA)</i></p>	Argentina, Australia, Japan, EU, Switzerland, FAO, New Zealand, USA, Costa Rica, PSM

	<p><i>*request to delete “and reduce the concentration of vendors that sell foods [high] [excessive] in energy density with minimal nutritional value” (EU)</i></p> <p><i>* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</i></p> <p><i>*suggested deletion of this paragraph (PSM)</i></p>	
331-e	<p>Governmental actors, in <del>collaboration</del> <u>consultation</u> with consumer associations, can <del>regulate and incentivize local food retailers and markets</del> to increase the number, variety, and sale of <u>sustainably produced</u> nutritious foods that contribute to healthy diets. This can be done by <b>creating local food policy councils</b> to give residents a voice in how best to improve availability, access and affordability of healthy diets, <u>in particular with local and seasonal food products</u> in their communities.</p> <p><i>*suggestion to move last sentence on local food policy councils to section 3.1 (Canada)</i></p> <p><i>* suggestion to delete the last sentence (USA)</i></p> <p><i>* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</i></p>	EU, USA, PSM, Canada, Switzerland
<b>332</b>	<p><b>Improving the availability and affordability of food that contributes to healthy diets</b></p> <p><i>* request to make reference to “sustainable and healthy diets” (EU)</i></p> <p><i>* Request to clarify difference between 331 and 332 (GAIN)</i></p>	EU, GAIN
332-a	<p>Governmental actors should <b>consider measures, including where appropriate, fiscal policies to <del>promote</del> improve the affordability</b> of healthy diets, <u>while discouraging the consumption of unhealthy products, where necessary</u>. This includes subsidies, <u>consumer incentives, granted in accordance to multilaterally agreed rules</u>, to promote nutritious, <u>safe, and sustainably produced</u> food <del>options</del> <u>(for example fruits and vegetables)</u> to ensure they are affordable and competitive compared with food and beverages <u>[high] [excessive] in energy density with minimal nutritional value</u> for which industry tax benefits for their development and marketing should be removed, <u>if necessary</u>. <u>This also includes, among others, taxing foods high in energy density with minimal nutritional value, where appropriate.</u></p> <p><i>* request to delete reference to fiscal policies (USA)</i></p> <p><i>* request to delete reference to subsidies (New Zealand)</i></p> <p><i>* request to delete references to fiscal policies and subsidies (Costa Rica)</i></p> <p><i>* alternative text for the last sentence:</i></p> <p><i>a) “At the same time, tax benefits for the development and marketing of food and beverages high in energy density with minimal nutritional value should be removed while tax on unhealthy foods (for example, sugar-sweetened beverages) may be</i></p>	EU, Canada, WFP, Japan, USA, Argentina, Australia, Russia, Switzerland, WHO, New Zealand, Costa Rica, WFP, Canada, PSM, CSM, Brazil, Indonesia

	<p><i>applied at the food producer level” (WFP)</i></p> <p><i>b) “This includes consumer incentives to make nutritious food options more affordable and competitively priced compared with food and beverages high in sugar, saturated fats, industrially-produced trans fats and sodium” (USA)</i></p> <p><i>* proposal to delete text after “affordable and competitive” (Indonesia)</i></p> <p><i>* proposal to delete text in the last sentence after “minimal nutritional value” (PSM)</i></p> <p><i>*proposal to delete last sentence (EU)</i></p> <p><i>* alternative text for the paragraph: “Governmental actors should seek the progressive reduction of barriers to international agricultural trade in order to promote access and ensure diversity and affordability of nutritious food options that integrate healthy diets” (Brazil)</i></p> <p><i>* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</i></p>	
332-b	<p>Governmental actors, <i>with the support of intergovernmental organizations and private sector</i>, should <b>strengthen public procurement systems and orient them by</b> ensuring healthy diets are available, <i>accessible</i> and convenient in public settings and institutions <i>such as including</i> kindergartens and other childcare facilities, schools, hospitals, foodbanks, workplaces, government offices, <i>military bases</i> and prisons, <i>nursing homes</i>, in line with national food-based dietary guidelines, <i>with good representation of local food chains with special regard to producers and processors, where available.</i> <i>[To do so, governmental actors should engage with other sectors, including farmers, private sectors and corporations towards nutrition goals which provides benefits for all sectors involved.] [Policymakers should consider promoting school meals with food procured from local, smallholder and/or family farmers or food grown in school gardens.]</i></p> <p><i>*request to highlight the need to restrict presence and sale of ultraprocessed or high-density foods in schools (CSM)</i></p> <p><i>* requests to mention that procurement guidelines need to be linked to sustainable production systems (WWF)</i></p> <p><i>* request to delete reference to food-based dietary guidelines (USA)</i></p> <p><i>* request to make reference to “sustainable and healthy diets” (EU)</i></p>	WFP, FAO, USA, Switzerland, EU, WWF, CSM
332-c	<p>Governmental actors should <b>link the provision of healthy school meals with clear nutritional and environmental objectives</b>, aligned with national food-based dietary guidelines and adapted to the needs of different age-groups, with special attention to the needs of adolescent girls. <i>[Policymakers and UN agencies intergovernmental organizations , and NGOs, should consider promoting home grown local and seasonal school meals, where food served in schools is procured from school gardens, local, smallholder and/or family farmers and fisherfolks.] School age children are often change agents that can be leveraged to change eating patterns of their families and communities.</i></p>	EU, WFP, IPES-FOOD, Canada, UNN4SUN, FAO, USA, New Zealand, Switzerland

	<p>* <u>request to delete last sentence (New Zealand)</u></p> <p>* <u>proposed deletion of the paragraph (USA)</u></p> <p>* <u>request to make reference to “sustainable and healthy diets” (Switzerland, EU)</u></p>	
332-d	<p>Governmental actors and intergovernmental organizations should facilitate the affordability of healthy diets for poor households through <b>social protection programmes</b> such as vouchers <u>for nutritious food</u>, cash <u>transfers</u>, <u>basic income-type schemes</u>, school <u>[feeding] [meal programmes or other community meals programmes]</u>, or <u>fortification of staple foods such as rice, maize or wheat, point-of-use fortification, and/or micronutrient supplementation</u> <del>food supplement</del> programmes. <u>[Where possible, social protection programmes should be linked to clear nutritional objectives, aligned with national dietary guidelines adapted to the needs of different age-groups.] [Social protection programmes should address nutritional needs across lifecycles.]</u></p> <p>* <u>request to make reference to “sustainable and healthy diets” (Switzerland, EU)</u></p> <p>* <u>additional COVID-19-related paragraph: “Governmental actors and intergovernmental organizations should strengthen the capacities of and equip social protection programmes for certain scale up as could be needed in the face of increased food insecurity and malnutrition for example due to COVID19 pandemic” (WHO)</u></p>	Canada, WWF, USA, New Zealand, WHO, EU, Switzerland
332-e	<p>Governmental actors, consumers, and <del>farmer-producer</del> organizations should promote the availability of <u>[nutritious and] sustainably produced</u> food that contributes to healthy diets <u>including</u> through <b>local farmers and fishers markets, short marketing channels, home gardens, [community cooperatives] [social organizations] and other community-building efforts</b> <del>that engage people around local food cultures.</del></p> <p>* <u>request to make reference to “sustainable and healthy diets” (Switzerland)</u></p> <p>* <u>proposed additional paragraphs:</u></p> <p>a) <u>“States should consider pricing policies of perishable fruit and vegetables, whole grains, legumes, nuts and seeds, and animal source food to ensure they are affordable and competitive compared with highly-processed food (which can be inexpensive but high in added sugars, sodium and trans-fats or unhealthy fats). This can be done through input subsidies, access to credit, and tax” (Switzerland)</u></p> <p>b) <u>“States can be instrumental in reducing the prices of nutritious and sustainably produced food by helping farmers reduce their production costs. This can be accomplished through grants, subsidies and non-financial support services to reduce inefficiencies and promote value of nutritious food in the supply chain” (Switzerland) – similar to para 332a</u></p> <p>c) <u>“Governments should establish financial and other measures that support entrepreneurs and small and medium enterprises</u></p>	Norway, FAO, EU, New Zealand, USA, Switzerland

	<i>operating in the value chains to secure delivery of healthy food to urban markets” (Norway)</i> d) on access to markets of Indigenous Peoples (FAO)	
333	<b>Monitoring new technologies and promoting trends for healthy diets</b>  <b>Alternative title: Encouraging new connection technologies and promoting trends for healthy diets (USA)</b> <b>Alternative title: Monitoring and supporting new technologies and approaches to promote healthy diets (PSM)</b>  <i>* request to make reference to “sustainable and healthy diets” (Switzerland, EU)</i>	USA, PSM, Switzerland, EU
333-a	Governmental actors should understand <del>and acknowledge</del> the influential roles of the <b>internet, social media, and online marketing of foods</b> , and should <del>[work toward monitoring and encouraging]</del> <i>[collaboratively work with]</i> media companies to promote nutritious, <b>safe, and sustainably produced</b> foods that contribute to healthy diets on social media spheres <i>as well as monitoring marketing of foods that contribute to excess consumption of nutrients of public health concern.</i>  <i>* request to refer to the need to regulate online food purchases, based on the criteria of the Human Right to Adequate Food and Nutrition, and other interrelated rights (CSM)</i> <i>* request to make reference to “sustainable and healthy diets” (Switzerland)</i>	Switzerland, Russia, IPES-FOOD, Canada, USA, CSM
333-b	Governmental actors should recognize the growing trend of <b>food purchased online and consumed away from home</b> (including street food) and should, <i>as appropriate to national circumstances, promote policy and/or</i> incentivize restaurants/online outlets to offer prepared dishes made from nutritious, <b>safe, and sustainably produced</b> foods that contribute to healthy diets, display information about food on menus (i.e. <i>eco-balances such as information about impacts on climate change, calories, product composition, and other nutritional content and other relevant information such as life-cycle assessments</i> ), avoid food waste, and <del>adhere</del> <i>full respect to any relevant</i> food safety regulations, <i>according to national laws and regulations regarding food advertising, especially those directed to children.</i>	Australia, FAO, Russia, Switzerland, EU, New Zealand, Brazil
<b>3.4 – FOOD SAFETY ACROSS SUSTAINABLE FOOD SYSTEMS</b>		
Para 41	Food safety <del>touches upon</del> <i>is foundational to</i> all parts of the food system and is critical to prevent food-borne pathogens, hazards and illness, as well as <del>transmission or contamination of</del> naturally occurring toxins <del>and contaminants, residues of pesticides, antibiotics, antimicrobials and heavy metals.</del> <i>Animal and plant diseases are likewise threats to the safety and resilience of food systems and to human health and nutrition.</i> Food cannot be considered nutritious if it is not safe, and poor food safety hinders the adoption of healthy diets. There is an increased urgency to improve the ability to track food safety <del>to help monitor the food supply flow, better connect producers to consumers,</del> and facilitate food recalling <del>and withdrawal</del> across coordinated networks. This section highlights the need for global and national cooperation on food safety and for every stakeholder to be responsible and accountable for the sourcing, handling, and quality control of food	New Zealand, USA, FAO, Philippines, USA, UNN4SUN, Russia, Costa Rica, CSM, EU

	<p>because of the potential spread of foodborne-related illness. <u>Trade policies and agreements affect the availability and affordability of food both in supplying and demanding countries, and thus constitute a major nutrition improvement pathway to be considered in policy-making.</u></p> <p><u>*alternative text for the first sentence: “Food safety is foundational to all parts of the food system and is critical to prevent potential hazards to food that include pathogens, naturally occurring toxins, pesticides, antibiotics, heavy metals and allergens” (New Zealand)</u></p> <p><u>*alternative text for the last sentence: “This section highlights the need for global and national cooperation on food safety and enhanced efforts across the food supply chain to reduce food-related illnesses” (USA)</u></p> <p><u>* request to add reference to AMR as a critical emerging issue concerning human and environmental health (CSM)</u></p> <p><u>* suggestion to remove the last sentence in track changes (Russian Federation, Costa Rica)</u></p> <p><u>* request to address food safety in a systematic way, and not to consider it for the end-product, not to contemplate only the micro-organism approach to protect those consuming from pathogens, but to enter into a holistic consideration of what it is meant by safe (CSM)</u></p> <p><u>* request to make reference to “sustainable and healthy diets” (EU)</u></p>	
341	<b>Adopting</b> <b>Strengthening</b> national and international cooperation on food safety	Switzerland
341-a	Governmental actors should <b>promote food safety within their food systems policies</b> <del>or</del> <b>and develop science-based food safety policies</b> that consider actions across the entire food systems - concerning production, processing, handling, preparation, storage, and distribution of food.	Switzerland, USA
341-b	Governmental actors should <b>develop, establish, strengthen and enforce, as appropriate, food safety control systems</b> , including reviewing, adopting, <del>modernizing</del> <b>updating</b> and enforcing national food safety legislation and regulations to ensure that food producers and suppliers throughout the food supply chain operate safely. [Considering the centrality of the Codex Alimentarius Commission on nutrition and food safety and quality, <u>as well as the OIE and IPCC work</u> ] Governmental actors should implement, as appropriate, <u>and with the support of intergovernmental organizations</u> , internationally adopted Codex, <u>IPCC and OIE</u> standards <del>at the national and sub-national levels</del> .	Switzerland, Indonesia, WFP, EU
341-c	Governmental actors and the FAO/WHO International Food Safety Authorities Network (INFOSAN) should participate in, share and contribute data and evidence to <b>international networks that exchange food safety information</b> , including the surveillance of foodborne hazards and disease outbreaks and management of emergencies to improve food safety [across a	FAO, EU, CGIAR, Indonesia, USA, PSM

	<p>range of issues such as <u>water quality</u>, pesticide residues, antimicrobial residues, <u>residues of veterinary medicinal products</u>, endocrine disrupters, [chemical and unsafe food additives] [<u>the use of unauthorized and unsafe food additives</u>], pathogenic bacteria, viruses, <u>toxins</u>, parasites, <u>zoonoses</u>, and fraud/adulteration of food products]. <u>Governmental actors should participate in assessments and indice (e.g. PVS, IHR, AFSI) that help them to understand their level of food safety performances and how it can be improved.</u></p> <p><u>* request to delete text after “to improve food safety” (Indonesia)</u></p> <p><u>* alternative text after “range of issues such as”: “pesticide residues, veterinary drugs residues, chemical and contaminants, and natural occurring toxins, food additives, pathogenic bacteria, viruses, parasites, and fraud/adulteration of food products” (USA)</u></p> <p><u>* request to add references to FAO/OIE/WHO Tripartite Collaboration on AMR (CSM)</u></p> <p><u>* additional suggested paragraphs:</u></p> <p><u>a) “Governmental actors should use risk assessment to understand and prioritize the burden of foodborne disease (risk ranking) and identify critical control points where interventions are most cost-effective. Actions should recognize that both sex and gender affect disease risk” (CGIAR)</u></p> <p><u>b) “governmental actors that define food safety standards should involve all producers and processors in the development of these standards in order to develop realistically applicable standards for them. Small scale food producers and small businesses should also be supported in achieving these standards or context-specific solutions should be developed with them” (CSM)</u></p>	
<b>342</b>	<b>Ensuring food safety across food production systems</b>	
342-a	<p>Governmental actors and private sector actors should <b>consider a One Health Approach</b> to food safety along the entire food and feed <u>supply chain</u>, recognizing the interconnection between food safety and human, plant, animal and environmental health, <u>particularly to mitigate future transmission of zoonotic diseases such as COVID-19.</u></p> <p><u>*In the context of COVID19, suggestion to further elaborate on the ONE Health Approach (WHO)</u></p>	USA, Canada, WHO
342-b	<p>Governmental actors, in collaboration with intergovernmental organizations, should <b>develop and implement national guidelines on the prudent use of antimicrobials</b> <b>National Plans to combat AMR [in food-producing animals activities]</b> [in livestock, aquaculture, and in plants, including in feed production]<u>according that take into account to</u></p>	Brazil, Switzerland, Argentina, Japan,

	<p><del>internationally multilaterally</del> adopted standards, relevant to [World Trade Organization/Sanitary and Phytosanitary (WTO/SPS) agreements and Codex ad hoc Intergovernmental Task Force on Antimicrobial Resistance], to <del>ban</del><del>reduce</del> the non-therapeutic] <u>[ensure prudent]</u> use of antimicrobials and to phase out the use of antimicrobials as growth promoters, <u>in the absence risk analysis consistent with the Codex Guidelines for Risk Analysis of Foodborne Antimicrobial Resistance.</u> <u>Global increase of antimicrobial resistance (AMR) is a major threat to human and animal health. It endangers modern human and veterinary medicine and undermines the safety of food and the environment. A collaborative One Health approach including multiple sectors is necessary to reduce AMR. The major policy areas of reducing AMR from the food system include awareness raising as well as developing the capacity for monitoring AMR and antimicrobial use (AMU) in food and agriculture.</u></p> <p><u>*suggestion to remove reference to “World Trade Organization/Sanitary and Phytosanitary (WTO/SPS) agreements and Codex ad hoc Intergovernmental Task Force on Antimicrobial Resistance” (Switzerland, EU)</u></p> <p><u>* suggestion to replace “Codex ad hoc Intergovernmental Task Force” with “Codex Alimentarius Commission” as the Commission is the decision-making body (Russian Federation)</u></p> <p><u>*suggestion to remove reference to “World Trade Organization/Sanitary and Phytosanitary (WTO/SPS) agreements” (Australia, USA)</u></p> <p><u>*suggest to add reference to relevant standards developed by OIE (USA, PSM, Switzerland)</u></p> <p><u>*suggestion to replace last three lines (from “Codex ad hoc Intergovernmental Task Force”) with “Codex Alimentarius Commission” (Brazil)</u></p> <p><u>* Suggestion to include a reference to the WHO 2015. Global Action Plan on Antimicrobial Resistance and to its WHA Resolution (WHO)</u></p>	Russia, EU, Australia, USA, PSM, WHO
343	<b>Protecting consumers from food safety risks in food supplies</b>	
343-a	<p>Governmental actors, private sector actors, <u>intergovernmental organizations</u>, and development partners should <b>promote and enhance traceability in food supply chains</b>, early contamination detection, and leverage the opportunities that new technologies offer for traceability solutions.</p> <p><u>*additional paragraph is suggested: “The private sector should be fostered to reach certification of their Food Safety Management System, recognized as as way to control food safety” (PSM)</u></p>	WFP

343-b	Investment by <u>governmental actors</u> , private sector actors <del>and donors</del> should <del>be made to support</del> <b>training for food producers, handlers and preparers-processors</b> <del>and</del> <del>[on the adoption]</del> of <del>[to comply with national]</del> scientifically, <u>supported</u> , risk-based <u>practices-measures</u> that can provide safe food while retaining their nutrient content.	Norway, EU, USA, Switzerland, Argentina
343-c	<p>Governmental actors should <del>[understand,]</del> <u>[adopt a prospective approach to]</u> <del>and evaluate</del> <u>assess emerging health risks, including endocrine disrupters, nanomaterials, neofomed contaminants, cocktail effects and the increased consumption of food with high levels of saturated fat, sugar or salt. They should regularly adapt legislation and guidelines as required, assess risks and unintended consequences and manage of new food products</u> created by emerging technologies (e.g. lab grown meats, and gene editing <del>inged</del> <u>modern biotechnology</u> products, etc.) as appropriate <del>[depending on]</del> <u>[taking into account]</u> scientific risk assessments and Codex standards, where available, as with any new food product in international regulatory frameworks <u>as well as legitimate factors other than science (for instance, consumer preferences)</u>".</p> <p><u>*request to keep original text without modifications (Russian Federation)</u>  <u>* request to delete references to understanding and evaluating risks and consequences: "Governmental actors should manage new food products..." (Indonesia)</u></p>	EU, Switzerland, USA, Russia, Indonesia
<b>3.5 - SOCIAL RELATIONS, KNOWLEDGE AND CULTURE OF DIETS</b> <u>* alternative titles are suggested:</u> <u>- People centered nutrition knowledge, education and information (Switzerland)</u> <u>- Protection of food culture and enabling people to improve their food practices for healthy diets (FAO)</u> <u>- Healthy food norms, knowledge, and practices (USA)</u>		Switzerland, FAO, USA
Para 42	<p>It is important to consider, <u>establish</u> and protect the range and diversity of food cultures, social norms, relations, and traditions that contribute to healthy diets without undermining progress in gender equality. This section outlines the policy entry points to improve access to knowledge, awareness, education, and the quality of information available to people on nutritious, <u>safe, and sustainably produced</u> food, healthy diets and nutrition as a way to empower people and key actors across food systems, <del>and improve places in which people access food in their daily lives</del>. Context-specific interventions and promotion of traditional <u>healthy</u> diets and knowledge originating from diverse food systems are vital to ensuring <u>equitable</u> <u>equal</u>, positive and sustainable impacts on nutrition and the environment.</p> <p><u>*additional text proposals for inclusion after first sentence:</u></p> <p><u>a) "social and behaviour change interventinos can shift norms around food and eating and empower people to make healthier food choices for themselves and their families. These interventions can and should cover the range from government policies</u></p>	EU, Russia, Switzerland, USA, Indonesia, New Zealand, CSM, FAO

	<p><i>to nutrition education to individuals counseling to mass media campaigns, all aimed at breaking down barriers that inhibit healthy diets and encouraging healthy norms around food and eating” (USA)</i></p> <p><i>b) “All policies and recommendations should be evaluated by nutrition scientists and all the decisions and policies have to have strong scientific rationales” (EU)</i></p> <p><i>* on the last sentence, request to avoid assumption that traditional diets are inherently nutritious, and that moving from a traditional diet to other ways of eating is detrimental to nutritional outcomes (New Zealand)</i></p> <p><i>* request to acknowledge that consumer choices and behaviours are shaped by structures and environments beyond their control (CSM)</i></p> <p><i>* request to make reference to “sustainable and healthy diets” (EU)</i></p> <p><i>* alternative text for the paragraph: “This section outlines the policy entry points to promote healthy diets through supporting people to improve their knowledge, motivations, skills and practices empowering key actors across food systems; and improving the environments in which people access foods in their daily lives. Context-specific interventions and promotion of traditional healthy diets and knowledge originating from diverse food systems are vital to ensuring equitable, positive and sustainable impacts on nutrition and the environment” (FAO)</i></p>	
351	<p><b>Utilizing food environment and consumer-centered policies and tools to <del>provide education and information</del> <del>and</del> promote healthy diets (FAO)</b></p> <p><i>*request to make reference to sustainable and healthy diets (Switzerland)</i></p> <p><i>* request that education and information include also sustainability criteria, not only health aspects (CSM)</i></p>	FAO, Switzerland, CSM
351-a	<p>Governmental actors, <i>in cooperation with scientific institutions</i>, should <b>develop national food-based dietary guidelines</b> for different age groups, <i>including young children, and special groups (vegetarians, pregnant and lactating women)</i> that define context-specific, <del>diverse</del>, healthy diets by taking into account social, cultural, scientific, economic, ecological, <i>spatial</i> and environmental drivers, <i>in line with planetary boundaries. Along with food-based dietary guidelines, it is important to invest in public health nutrition tools that can be used for practical nutrition education and promotion of healthier diets.</i></p> <p><i>Alternative text for the paragraph: “Governmental actors, supported by partners, should <b>develop and implement evidence-based food-based dietary guidelines</b> that respond to a country’s public health, nutrition and related sustainability priorities and that use a multisectoral process and food systems approach to promote policy coherence (e.g. food and nutrition education, health, food and agriculture, social protection, fiscal, etc.) for healthy diets” (FAO)</i></p>	EU, WWF, WFP, FAO, Switzerland

	<u>*request to make reference to sustainable and healthy diets (Switzerland)</u>	
351-b	<p>Governmental actors should <b>develop evidence-based nutrition standards <del>and as a basis to</del> [restrict the promotion and] [support the development of robust codes of conduct on the] [examine] marketing</b> (including digital marketing, <u>sponsorship, and advertising</u>), promotion and sponsorships exposure, especially of children <u>and youth</u> aged 18 or younger, to foods [high] <u>[and beverages excessive]</u> in energy density with minimal nutrition value [and] <u>[including] [sugar-sweetened beverages]</u>, in accordance with multilaterally agreed rules and national legislation, <del>where applicable</del>. <u>Such measures could include prohibition to sell and advertise such food in public places or near schools, including child care facilities, where necessary</u></p> <p><u>* suggestion to replace “food high energy density with minimal nutrition value and sugar-sweetened beverages” with “foods and bevarages that contribute to excess intakes of nutrients of public health concerns” (Canada)</u></p> <p><u>* suggestion to replace “food of high energy density with minimal nutrition value and sugar-sweetened beverages” with “less nutritious foods and beverages” (EU)</u></p> <p><u>* request to delete a specified age of children (Canada, EU)</u></p> <p><u>* alternative text for the paragraph was suggested: “Governmental actors should develop evicence-based dietary guidelines for children aged 18 or younger, and separately for children 0-24 months. Complementaty policies should be considered to reduce the impact of marketing of foods high in energy density with minimal nutritional value to children as well as the sale of foods of high energy density with minimal nutritional value near schools” (USA)</u></p>	PSM, FAO, Switzerland, EU, Japan, Canada, New Zealand, USA
351-c	<p>Governmental actors should <u>promte breastfeeding and regulate the marketing of commercial infant formula</u> and other breast-milk substitutes and <u>implemet-enforce</u> the International Code of Marketing of Breast-Milk Substitutes and subsequent <u>relevant</u> WHA resolutions, <u>taking into account their national contexts</u>.</p> <p><u>* Alternative text without references to International Code of Marketing of Breast-Milk Substitutes and subsequent WHA resolutions was suggested for the paragraph: “Governmental actors should regulate the marketing of commercial infant formula and other complementary products to ensure proper food safety and essential nutrient composition needs for infant and young children. Labeling should be clear and discernible to allow consumers purchasing these products to identify those appropriate for the age of their infant and young child” (USA)</u></p>	Thailand, Switzerland, PSM, EU, New Zealand, USA
351-d	<p>Governmental actors should <b>regulate nutritional labelling [and consider] [including consideration of] front-of-pack labelling (FOPL), where necessary,</b> to <u>empower consumer to choose food consistent with <del>promote</del> healthy diets, taking into account sustainability dimensions</u>. The <del>FOPL</del> system should be aligned with national public health and nutrition</p>	EU, USA, Japan, WHO, WWF, Argentina, FAO, New Zealand,

	<p>policies and food regulations, <u>based on sound specific basis to allow informed choices in the context of the overall balance of a healthy diet, taking into consideration</u> as well as relevant WHO guidance and Codex guidelines, <u>and other relevant multilaterally agreed rules. Governments should consider comprehensive policy guided by a strong FOPNL warning label, such that marketing to children and the sale of foods in schools is limited to those foods and beverages without warning labelling.</u>][The FOPL system should be easy to understand, objective, fact- and science-based. The FOPL system should comprise an underpinning nutrient profile model that considers the overall nutrition quality of the product or the nutrients of concern for <u>achieving an adequate nutritional status while avoiding NCDs (or both).</u> <u>At the same time, if necessary, c</u>omplementary policies could be considered for foods of [high] [excessive] energy density with minimal nutritional value to not be sold or marketed in public places or near schools, including kindergartens and child care facilities.</p> <p><u>*suggested deletion of the sentence that begins with “The FOPL system should comprise...” (EU)</u>  <u>*suggested deletion of last part of the recommendation, from “The FOPL system should comprise” until the end (USA, PSM)</u></p> <p><u>*alternative text for the last sentence: “Complementary policies could be considered for less nutritious foods and to regulate the selling or marketing near schools, kindergartens and child care facilities” (EU)</u></p> <p><u>* request that labels indicate climate and environmental impact of food (WWF)</u>  <u>* request to consider nutrients of concerns along with overall nutritional quality of the product (New Zealand)</u>  <u>*request to make reference to sustainable and healthy diets (Switzerland, EU)</u></p>	WFP, PSM, CSM, Switzerland
351-e	<p>Governmental actors should <u>[promote or provide incentives to]-[encourage]</u> private sector actors to <u>produce more nutritious foods and design food outlets, including markets, restaurants, and other places</u> where food is sold or served <del>by encouraging</del><u>that encourage</u> the placement and promotion of foods that contribute to healthy diets <del>in retail spaces.</del></p> <p><u>* alternative text for the paragraph: “Governmental actors should provide incentives for private sector actors to encourage the placement, and promotion of foods that contribute to healthy diets in retail spaces” (USA)</u>  <u>*suggestion to remove this paragraph as this is not a role for governments (Australia)</u>  <u>*request to make reference to sustainable and healthy diets (Switzerland, EU)</u></p>	EU, Indonesia, WFP, FAO, USA, Australia, Switzerland
351-f	<p>Governmental actors, <del>UN agencies</del><u>intergovernmental organizations, civil society and</u> NGOs, and medical and health practitioners should <del>consider</del> <u>coupling-integrate nutrition education and counselling practices in different settings (including but not limited to schools, hospitals, health and counselling centers)</u> directed and open <del>those who</del> <u>those who might need</u></p>	WFP, EU, FAO, USA

	<p><del>them, including</del> to populations participating in maternal and child nutrition programmes, <u>including school-aged children, adolescents, parents, and caregivers.</u></p>	
351-g	<p>Governmental actors, <del>supported by UN agencies</del> <u>intergovernmental organizations, civil society and NGOs, private sector,</u> and medical and health practitioners should <b>promote a range of behavior change interventions such as social and behavior change communication (SBCC), food and nutrition education and social marketing and social support interventions as a way to positively influence <del>knowledge, attitudes</del> <u>behaviors</u> and social norms, and coordinate messaging on nutrition across a variety of communication channels to reach multiple levels of society (e.g. mass media campaigns). <u>[SBCC campaigns should always be based on a proper strategy to ensure the efficacy and consistency of the message provided.] [It is important to also invest in interpersonal communication (IPC), community dialogues, and nutrition education.]</u></b></p>	WFP, FAO, EU, Switzerland, PSM
351-h	<p>Governmental actors, intergovernmental organizations <del>including UN agencies, preparers of food,</del> and private sector actors should educate all food system actors to <b>prioritize the reduction of food loss and waste. This is required at several levels: off-farms, in the retail process and at the consumer level (households, workplaces, restaurants).</b> Actions could include <u>action plans and monitoring with quantified targets over time,</u> awareness campaigns at national, regional and global levels, labelling schemes, <u>research, training, public and school education,</u> and updating <del>Food-Based national</del> Dietary Guidelines to align recommendations with policies and programmes to tackle food <u>loss and</u> waste.</p> <p><u>* proposal to delete reference to Food-Based Dietary Guidelines from this paragraph (FAO, USA)</u></p> <p><u>Additional paragraph is suggested: “Governmental actors, intergovernmental organisations, private sector, food actors and NGOs should implement nutrition education and information interventions based on Food-Based Dietary Guidelines and other policies related to food systems. The inclusion of nutrition education and information within agriculture extension technical packages as a way to support producers in increasing the production of high nutrient density crops and crop diversification should be considered” (Switzerland) – second part of the paragraph is addressed under 323d.</u></p>	EU, FAO, USA, Canada
<b>352</b>	<b><u>Encouraging Safeguarding positive local food knowledge and culture (FAO)</u></b>	FAO
352-a	<p>Governmental actors, civil society organizations <u>and privat sector actors,</u> and <del>UN agencies</del> <u>intergovernmental organizations</u> should use <u>[science and</u> evidence-based as well as] cognitive, cultural, and plural knowledge resources to <b>promote education and knowledge</b> of healthy diets, <u>nutrition,</u> physical activity, food <u>loss and</u> waste prevention, <del>intra</del>household food distribution, food safety, optimal breastfeeding and, <u>where needed,</u> complementary feeding, taking into consideration <u>local</u> cultural and social norms and adapting to different audiences and contexts.</p> <p><u>* alternative text for the paragraph is suggested + proposal to move it to 351: “Governmental actors, together with partners</u></p>	USA, WFP, EU, New Zealand, PSM, Switzerland, FAO

	<p><i>(including civil society organizations, NGOs and UN agencies) should promote, design, implement and evaluate <b>community-based food and nutrition education programmes</b> to improve, change and/or consolidate priority food and nutrition behaviours. These programmes should follow international best practice (needs and evidence-based, behavior-focused, context-specific, hands-on, owned by people, inclusive of influencers of changes, adequate dose and duration, and supported by food environment policy and system change” (FAO)</i></p> <p><i>* request to refer to “sustainable and healthy diets” (Switzerland, EU)</i></p>	
352-b	<p>Governmental actors, <u>intergovernmental organizations</u>, civil society organizations <u>and private sector actors</u>, community leaders, social workers, and health professionals should <b>encourage food culture</b> and the importance of food in cultural heritage, culinary skills and nutrition literacy among communities. This can be done through community and consumer associations and educational institutions, targeting men and women.</p>	WFP, USA, PSM
352-c	<p>Governmental actors should <u>appropriately protect and promote the knowledge that Indigenous Peoples</u> have with regard to local traditions and methods of producing, preparing, and preserving <u>local and traditional</u> food that <u>promote food safety and imparts</u> has nutritional and environmental benefits.</p> <p><i>* request to add text on the need to develop specific indicators on Indigenous Peoples nutrition and food security (Canada)</i>  <i>* request to acknowledge that food systems and sustainable healthy diets need to be rooted in social knowledge, including experiential, traditional and indigenous knowledge. While scientific-knowledge is obviously important, it also needs to be screen with rigorous assessments that ensure its trustworthiness and freedom from conflicts of interest (CSM)</i></p>	USA, EU, Canada, CSM
<b>353</b>	<p><b>Promoting “hubs” for food and nutrition knowledge, education and information learning (FAO)</b>  <i>* proposed amendment to the title (Switzerland)</i></p>	FAO
353-a	<p>Universities and <u>technical schools, and technical and vocational education and training (TVET) centres</u>, should <b>institute a tailored nutrition education curriculum</b> for <del>all medical, nursing health, teaching, and</del> agriculture, <del>and</del> food technology <u>and extension</u> students during training.</p>	FAO
353-b	<p>Governmental actors, civil society organizations and <del>UN agencies</del> <u>intergovernmental organizations, universities and schools</u>, should <b>promote nutrition knowledge and culinary skills</b> as well as skills to produce food through school <u>gardens</u> among school-age children, adolescents and adults (including promoting communal mealtimes, socializing around food, consuming healthy diets, and reducing food waste) <u>[in schools, workplaces and community centres] [in a variety of settings]</u>, as well as equip youth with knowledge, and ability to learn about healthy eating habits, how to produce nutrient-dense foods, and how to prepare them.</p> <p><i>* request to refer to “sustainable and healthy diets” (Switzerland, EU)</i></p>	WFP, EU, Switzerland, USA, PSM, Thailand
353-c	<p>Governmental actors, <u>with the support of intergovernmental organizations</u>, should <b>adopt and implement</b></p>	WFP, Costa Rica, Switzerland, EU,

	<p><b>comprehensive school and pre-school food and nutrition policies</b>, review education curricula to incorporate nutrition and sustainability principles, involve communities in promoting and creating healthy food environments and healthy local and the healthy aspects of traditional diets in schools, kindergartens and other childcare facilities, linking the provision of healthy school meals with clear nutritional and environmental objectives, and support school health and nutrition services.</p> <p><i>* alternative text is suggested for this paragraph + proposal to move it to 351: “Governmental actors should adopt and implement comprehensive school food and nutrition policies and programmes, which feature high-quality hands-on education curricula that incorporates competence-based food and nutrition education, community involvement, healthy food environments (e.g. setting school meal nutrition standards, regulating the sale and marketing of foods in and around schools, information environment, provision of safe drinking water, etc.) and support school health and nutrition services, including physical education” (FAO)</i></p> <p><i>* request to refer to “sustainable and healthy diets” (Switzerland, EU)</i></p>	Russia, FAO
353-d	<p>Governmental actors, intergovernmental organizations, NGOs, and civil society organizations should <b>engage in food and nutrition dialogues with communities, farmer field schools and agriculture extension services</b> by <del>drawing</del> <del>on</del> <b>sharing</b> the knowledge, experience and insights of individuals who are not usually regarded as members of the nutrition community (e.g. community and religious leaders, chefs, supermarket buyers, influencers on social media, youth leaders, farmers and food producers, young entrepreneurs, mayors and local communities).</p> <p><i>* alternative text is suggested for this paragraph + proposal to move it to 351: “Governmental actors, intergovernmental organizations, NGOs, and civil society organizations should engage in nutrition dialogues with communities by drawing on the knowledge, experience and insights of individuals who are not usually regarded as members of the nutrition community (e.g. community and religious leaders, chefs and food service staff, market buyers, influencers on social media, youth leaders, farmers and food producers, young entrepreneurs, mayors and local communities)” (FAO)</i></p> <p><i>*proposed additional paragraph on Global Hub on Indigenous Peoples Food Systems (FAO)</i></p>	Switzerland, EU, USA, FAO
<p><b>3.6 - GENDER EQUALITY AND WOMEN'S EMPOWERMENT ACROSS FOOD SYSTEMS</b></p> <p><i>* request to expand this section by addressing living wages and the promotion of development and access to sustainable innovations, resource hubs and new technologies (PSM)</i></p> <p><i>* request to expand references to women's rights, and on central role of unequal power relations and gender violence in causing malnutrition (CSM)</i></p>		PSM, CSM
Para 43	<p>Gender relations and cultural norms are among the most significant drivers of healthy diets and nutrition outcomes. In many countries, women produce food, make decisions about the household's diet and, <del>as primary caregivers, and</del> influence</p>	New Zealand, Thailand, WFP,

	<p>the <del>family's</del> nutritional status <b>of household members</b>. Women are important agents <del>of change</del> for sustainable development, <del>not only</del> <b>namely</b> as food system actors, but also as actors in their households, communities and <del>overall society</del> <b>countries</b>. At the same time, women <b>and girls are disproportionately assigned responsibilities for unpaid care and domestic work and often face higher levels of food insecurity and worse nutrition outcomes</b> <del>have an unequal household labour burden that should be addressed. Therefore, w</del> Women's and girl's empowerment through <b>redistribution of such unpaid work, education, and access to</b> information and <del>access to</del> resources and services <b>are needed</b> <del>is key</del> to improving nutrition. This section highlights the importance of improving women's wellbeing, ensuring <b>direct</b> access to financial, technical and biophysical resources, improving agency <b>and participation in decision-making</b>, voice and status, and challenging the power relationships and legal impediments that limit equality and choices.</p> <p><i>* request to refer to "sustainable and healthy diets" (EU)</i></p>	EU, FTA, FAO, Canada
<b>361</b>	<b>Empowering women</b>	
361-a	<p>Governmental actors should <del>pass laws that promote equal participation</del> <b>between women and men in political decision-making</b>; <del>Governmental actors should take specific measures to support</del> <b>ing women's participation with in specific attention to rural [and indigenous women] [contexts], and ensuring gender equality in</b> holding leadership roles in decision making bodies – parliaments, ministries and local authorities at district and community levels—<del>so that they can be part of the process of devising solutions to the malnutrition challenges they face. Such efforts, however, should not reinforce the instrumental view of women's role in nutrition as the only custodians of nutrition. Therefore governments and other agencies should embark on behavior change strategies at household and community level to engage with men and boys to support women and girls in nutrition as a joint responsibility.</del></p>	USA, WFP, EU
361-b	<p>Governmental actors should <b>promote an enabling environment to generate socio-cultural changes towards gender equality</b> with specific policies, programmes, institutions and advocacy campaigns to deal with the various forms of discrimination and violence women face. <del>[States should support efforts of redistributing care work so that men and boys take responsibility for their due share. The role and capacities of men in promoting sustainable healthy diets should also be promoted so that responsibilities do not fall into the burden of women's shoulders only] [Women farmers are particularly vulnerable to violence, due to their relatively weaker social position and lack of awareness regarding their rights. Such strategies to increase women's decision making power will require also engaging men to minimize backlash. Offering equal levels of access to extension and advisory services may require changes in the modality (location, timing) and delivery of training so that women are able to benefit from extension]</del></p>	WFP, CSM, EU
361-c	<p>Governmental actors and intergovernmental organizations should <del>increase</del> <b>promote adolescent girls' and women's human capital development</b> by ensuring they have access to education, literacy programmes, health <del>care</del> <b>services (including sexual and reproductive health services)</b>, and other social services <del>as a way</del> to increase <del>household</del> nutritional</p>	USA, WFP, CSM

	status. * request that proposed measures be cautious to not reinforce unequal gender roles and power relations (CSM)	
<b>362</b>	<b>Promoting and acknowledging women as food system entrepreneurs</b> * request to amend the title to recognize the key contribution of women to protection and regeneration of nature in food systems (CSM)	CSM
362-a	Governmental actors should <b>ensure women's equal tenure rights</b> and promote their equal access to and control over productive land, natural resources, inputs, productive tools, and access to education, training, markets, and information in line with the CFS VGGT.	
362-b	Governmental actors, private sector actors, and intergovernmental organizations should <b>enhance women's roles in agriculture</b> by <del>giving-ensuring that</del> women <del>have</del> decision-making power over what they choose to produce, and how they choose to produce those crops/food. Women should be offered equal <del>levels of</del> access to extension and advisory services for crops and animal products that they produce or process, capacity-building to engage with traders, financial services (credit and savings mechanisms), and entrepreneurial opportunities across food systems.	WFP
362-c	Governmental actors, NGOs and private sector actors should <b>promote and increase access of women to labour and time saving technologies</b> that could help improve the livelihoods <del>of women</del> .	Switzerland
362-d	Governmental actors and private sector actors should <b>facilitate women's equal access to entrepreneurship and employment opportunities</b> across food systems and related activities, <del>leveraging existing business platforms</del> to generate <del>adequate</del> income, <del>as well as and</del> increase <del>their women's</del> participation in decision-making on the use of household income and <del>opportunities to</del> build and manage savings <del>without reinforcing unequal gender roles</del> . <del>This</del> <del>Such opportunities</del> would include <del>household and</del> business <del>budget management</del> training, decision-making skill development, scaling of financial services and products both accessible and relevant to women's needs, and tools to help men and women strengthen their intra-household communication, <del>to minimize backlash, and equitable division of unpaid labour</del> .	WFP, FAO, EU, CSM
<b>363</b>	<b>Recognizing and addressing women's nutritional status and deprivation (USA)</b> *request to add "cooperation" after "status" (WFP)	USA, WFP
363-a	Governmental actors, intergovernmental organizations, NGOs, and development partners should <del>pay specific attention to</del> <b>understand and advance the nutritional well-being of adolescent girls and women</b> , <del>including through provision of multisectoral and</del> provide health and nutritional <del>care and</del> services through <del>various sectors</del> . This can be done by ensuring that national development strategies are <del>informed by participatory driven by</del> gender <del>and age</del> analyses, and that <del>those</del> women and adolescent girls with compromised nutritional status and higher levels of deprivation, <del>are the recipients of</del> <del>access gender-responsive</del> social protection <del>policies and benefits</del> schemes.	WFP
363-b	Acknowledging the significant time and work burden of women in <del>taking care of all family members, including through the</del> preparation of nutritious meals <del>with sustainably produced ingredients, and as well as</del> their roles in agriculture and food	WFP, EU, USA

	production, governmental actors should <b>recognize and value the importance of unpaid care and domestic work at the household level</b> through the effective implementation of protective laws, social protection programmes, and <del>other benefits related service provision, and should enable</del> as well as to promote gender-equitable-equal distribution of care work. <del>The equal participation of men in unpaid work should be promoted, especially where women are also active in productive labour.</del>	
363-c	Governmental actors should create an enabling legal framework and supportive practices to <b>protect and support breastfeeding</b> , ensuring that decisions to breastfeed do not result in women <del>losing their being</del> economically disadvantaged or denied security or any of their rights. This should include implementing maternity protection legislation, including <del>entitlement to publicly funded</del> paid <del>maternity-parental</del> leave ( <del>or and</del> paternity leave), and removing workplace-related barriers to breastfeeding ( <del>such as</del> lack of breaks, facilities, and services).	WFP, USA
<b>3.7 – RESILIENT FOOD SYSTEMS IN HUMANITARIAN CONTEXTS</b>		
Para 44	<p>Linking food security and nutrition interventions during humanitarian crises (<del>man-made</del>human-induced and climate change-related disasters, epidemic/pandemic) with longer-term strategies <b>is essential</b> to strengthen the resilience of food systems <del>is key</del>. Short or protracted crises [are often brought on by conflict and climate change, displacing millions which] increases <del>their</del> risk of food insecurity and malnutrition. <u>The critical focus in these contexts is identifying how to balance meeting immediate food security and nutrition needs with these broader principles, considering the timeframes that may be required for response interventions, and what impacts these may have on the food system, while also considering opportunities to protect, strengthen, or leverage the system itself. Opportunities should be sought to link interventions during humanitarian crises with longer-term strategies to strengthen the resilience of food systems. In addition, epidemics and pandemics can also pose serious threats to food security.</u> Considering the importance of resilient food systems, this section highlights the importance of strengthening the nexus between humanitarian and development programming and builds upon the 11 principles in the CFS Framework for Action for Food Security and Nutrition in Protracted Crises (FFA), <u>as well as the SPHERE Humanitarian Standards.</u></p> <p><u>* request to expand definition of humanitarian crises (New Zealand)</u></p> <p><u>* request to use this section to observe provisions of international humanitarian law in terms of prohibitions against destruction of central elements of sustainable food systems (CSM)</u></p> <p><u>* request to add text on impacts of pandemics</u></p> <p><u>* request to undertake systemic analysis rather than locking policy domains into silos, and avoid using this section to draw implications of COVID (CSM)</u></p>	New Zealand, Switzerland, EU, Indonesia, WFP, , WFP USA, HarvestPlus, Russia, CSM
<b>371</b>	<b>Protecting the most vulnerable to malnutrition in humanitarian contexts</b>	
371-a	Governmental actors, <del>intergovernmental and humanitarian</del> organizations should pay particular attention, protection, and	WFP, EU,

	<p>facilitate access to <b>sustainably produced, safe and nutritious food and nutritional support</b> to most <b>vulnerable and marginalized groups, and implement community-based social and behavioral change activities to address malnutrition in humanitarian settings</b>. Vulnerable and marginalized groups include pregnant and lactating women, women of reproductive age and adolescent girls, infants, children under five, people living with HIV, tuberculosis and other infectious diseases, internally displaced people, the elderly and people with disabilities.</p> <p><i>* request to delete “vulnerable and” (Indonesia)</i></p>	Indonesia
371-b	<p>Governmental actors and parties involved in conflicts should <b>respect and protect the equal and unhindered facilitate access</b> of all members of affected and at-risk populations to food security and nutrition assistance, in both acute and protracted crises, <b>in accordance consistent</b> with internationally recognized humanitarian principles, as anchored in Geneva Convention of 1949 and other UNGA Resolutions after 1949.</p>	USA
371-c	<p>Governmental actors, with the support of <b>the UN system intergovernmental organizations</b> and international assistance and cooperation where appropriate, should ensure <b>access to nutritious food and nutritional support for refugees and asylum seekers</b> in their territory, in accordance with <b>their governments’</b> obligations under relevant international legal instruments. <b>Governments should have a proper plan how to ensure food security of the most vulnerable and marginalized groups in crisis situations (such as epidemics, pandemics, natural disasters, etc).</b></p>	WFP, Switzerland, EU
<b>372</b>	<b>Improving the quality of food and nutrition assistance</b>	
372-a	<p>Governmental actors, all parties involved in conflicts, climate-related disasters, <b>epidemics and pandemics</b>, and food assistance, including <b>intergovernmental humanitarian</b> organizations, should <b>ensure that food security and nutrition assessments and analyses (such as the Integrated Phase Classification System)</b> are undertaken <b>throughout a crisis</b> to inform the food and nutrition response as well as any components of the local food system requiring rehabilitation.</p> <p><i>* request for these assessments to adhere to internationally accepted methods, and be impartial, representative, gender-sensitive and well-coordinated with governments (CSM)</i></p>	EU, WFP, FAO, CSM
372-b	<p>Governmental actors should recognize nutrition as an essential need and humanitarian assistance should <b>aim to meet and recurrently monitor nutritional requirements of the affected population</b>, particularly the most vulnerable to malnutrition. Any food items provided should be of appropriate nutritional quality and quantity, be safe and <b>socio-culturally</b> acceptable, and not harm local markets. Food <b>must should</b> conform to the food standards of the host country’s government <b>adopted</b> in line, <b>whenever appropriate, with WTO rules and, in particular,</b> with the Codex Alimentarius standards about food safety, quality, <b>composition</b> and labelling, <b>as appropriate</b>.</p>	EU, Argentina, FAO, USA, Russia, New Zealand, Australia
372-c	<p>Governmental actors and <b>humanitarian assistance intergovernmental</b> organizations should <b>support social protection mechanisms by be encouraged to purchasing locally produced food, if necessary, including fortified food (and</b></p>	WHO, WFP, FAO, EU, USA, Brazil,

	<p>support wasting treatment programmes by purchasing locally produced <del>including</del> Ready to Use Supplementary and Therapeutic foods <del>in some contexts and supplementary food</del> and ensure <del>adequate coverage also they are available through social protection mechanisms and acute malnutrition management programmes, with improved coverage</del> during times of crisis. [Fortification should be used only in limited times and places and should not disrupt local market and accessibility of nutritious food in the longer term.]</p> <p>* proposed deletion of last sentence (WFP, WHO, USA) or alternative text is suggested:  a) UNICEF: <i>“Food fortification plays an essential role in addressing hidden hunger and is critical to providing essential micronutrients to vulnerable populations within humanitarian contexts”</i>  b) New Zealand: <i>“Fortification should be used where there is an indentified public health need, and monitored through appropriate programmes”</i>  c) EU: <i>“Fortification efforts should be evidence-based and not disrupt local market and accessibility of nutritious food in the longer terms”</i>  d) additional text suggested at the end of the recommendation: <i>“While fortification has a role to play in fragile contexts or in humanitarian crises, public policies/programs should not generically promote fortification, as it risks deviating attention and resources from long-term promotion of sustainable food systems. Public fortifications programmes must always be based on public health needs. Any reference to fortification should clarify the contexts in which fortified foods should be used”</i> (EU)</p> <p>*proposed deletion of reference to fortification and to Ready to Use Supplementary and Therapeutic foods (FAO)  * proposed deletion of reference to Ready to Use Supplementary and Therapeutic foods (USA)</p> <p>* request not to consider fortified food as a long-term solution regarding malnutrition (CSM)</p> <p>* alternative text for the paragraph is suggested: <i>“Governmental actors and humanitarian assistance organizations should be encouraged to purchase locally produced, always preferring fresh and traditional foods. Food fortification with micronutrients should be directed to fresh and traditional foods in order to promote and preserve health. Ready to Use Supplementary and Therapeutic foods should only be administered in specific contexts and available through social protection mechanisms and acute malnutrition management programmes, with improved coverage during times of crises in a context where a diet based on fresh and traditional foods is not possible”</i> (Brazil)</p>	CSM, UNICEF, New Zealand, CSM
372-d	<p>Governmental actors should <b>have an explicit policy on infant and young child feeding (IYCF) in emergencies, in line with the recommendations of the International Code of Marketing of Breast-Milk Substitute.</b> <del>and</del> <del>g</del>Governmental actors, <del>UN agencies</del> <del>intergovernmental organizations</del> and NGOs should ensure that such policies on IYCF practices are <u>protected, promoted, implemented, [coordinated, promoted, and improved at all times, upon]</u> <del>during</del> during humanitarian crises <del>and</del></p>	WFP, WHO, EU

	<p><a href="#">emergency responses.</a></p> <p><i>*request to delete “coordinated, promoted, and improved upon” (WHO)</i></p>	
372-e	<p><a href="#">Governments, intergovernmental organizations, UN agencies</a> and humanitarian assistance organizations should ensure that when implementing cash and voucher assistance, <b>the minimum expenditure basket and transfer value is promoting sustainably produced nutritious and safe food</b> that is locally available and sufficient to provide a healthy diet for all stages of the lifecycle. <a href="#">Governmental actors should implement specific policies to restrict donations and financial or in-kind contributions from ultraprocessed food and beverage companies during emergencies.</a></p>	EU, USA
<b>373</b>	<b>Ensuring food systems are resilient in humanitarian contexts</b>	
373-a	<p>Governmental actors in partnership with <a href="#">intergovernmental organizations and</a> relevant organizations should <a href="#">undertake food system analyses, develop and use early warning systems, climate services information services systems, and as well as food and agriculture information systems, including food price monitoring systems,</a> that detect and monitor threats to food production, availability and access as well as food safety <a href="#">hazards</a> and tampering. These early warning systems should be integrated into broader food analysis systems including the monitoring of the availability and affordability of <a href="#">sustainably produced</a> nutritious foods that contribute to healthy diets at the local level.</p> <p><i>* request to add reference to Anticipatory Action, as it is linked to early action, as a way to more effectively respond to threats to food production, especially drought situations (New Zealand)</i></p> <p><i>* request to refer to “sustainable and healthy diets” (Switzerland)</i></p>	WFP, Switzerland, USA, EU, New Zealand
373-b	<p>Governmental actors, <a href="#">intergovernmental organizations,</a> [development partners and donors] should <b>invest in disaster risk reduction measures</b> that benefit those most at risk/need. In particular, productive assets should be protected from severe weather and climate impacts <a href="#">and other disasters</a> in a way that strengthens the resilience of affected populations and their ability to cope with shocks due to conflicts, and climate -related disasters <a href="#">as well as economic shocks.</a> <a href="#">Measures include social safety nets, investment in protecting fragile livelihoods, emergency fiscal and food reserves, reduction of transaction costs, and identification of platforms for integrated interventions.</a> Governmental actors should aim to restore local food production and market accessibility as rapidly as possible.</p> <p><i>* alternative text for second part of the paragraph, after “disasters”: “Ecosystems that provide disaster risk reduction services should be conserved or restored. Where appropriate, diversified production strategies (e.g. mixed systems and/or use of multiple species, varieties, etc.) should be utilized to hedge against climate-related and other risks. Governmental actors should aim to restore local seed systems, including through the implementation of Farmers’ Rights as set out in the</i></p>	WFP, EU, USA, Switzerland, FAO

	<i>International Treaty on Plant genetic Resources for Food and Agriculture, food production and market accessibility as rapidly as possible. Resilience should be strengthened through sustainable land management practices, rainwater harvesting, local saving and credit schemes” (FAO)</i>	
373-c	<p>Intergovernmental organizations particularly <del>the UN agencies</del> <u>intergovernmental organizations</u> and development partners should <b>use incorporate local and non-governmental organizations in the implementation of humanitarian food assistance</b> and livelihood programmes to support economic recovery and development, strengthen sustainable local food systems and foster the ability of smallholders and/or family farmers to access resources to bolster production and markets.</p> <p><i>* additional suggested paragraph: “A strong focus on the participation of affected populations should be a priority for all humanitarian food assistance and livelihood programmes. UN agencies and humanitarian assistance organizations should seek the views of the affected population, and encourage their participation when determining needs, in allocation and delivery of assistance, and when assessing impact” (Australia)</i></p> <p><i>* additional paragraph on state failure is suggested (CSM)</i></p>	WFP, USA, Philippines, Australia, CSM
<b>PART 4 – IMPLEMENTATION AND MONITORING OF THE USE AND APPLICATION OF THE VOLUNTARY GUIDELINES ON FOOD SYSTEMS FOR NUTRITION</b>		
<i>* request for the monitoring section to make reference to existing frameworks such as the work done on the Right to Food Monitoring/Indicators by FAO. In addition, the principles for the assessment framework toward sustainable food systems should be linked to the principles defined in the CFS Global Strategic Framework, GSF (CSM)</i>		
<b>4.1 – POLICY FORMULATION AND IMPLEMENTATION OF THE VGFSyN</b>		
Para 49	All CFS stakeholders are encouraged to <b>promote at all levels</b> within their constituencies, and in collaboration with other relevant initiatives and platforms, the <b>dissemination, use and application of the VGFSyN</b> to support the development and implementation of coordinated and multisectoral national policies, laws, programmes and investment plans <u>toward the promotion of sustainable food systems that deliver healthy diets and improve nutrition.</u>	Switzerland
Para 50	The VGFSyN are intended to <b>support the implementation of the UN Decade of Action on Nutrition 2016-2025</b> with the objective of increasing the visibility, coordination and effectiveness of nutrition actions at all levels, as key aspects toward the realization of the 2030 Agenda for Sustainable Development. <u>This shall be done in the spirit of global citizenship and shared responsibility for the realization of the 2030 Agenda for Sustainable Development by policy makers, the private sector, civil society and academia - developing countries as well as developed countries, considering the global impact of</u>	EU, Indonesia

	<p><u>national actions (e.g. on climate change, trade, sustainable consumption and production).</u></p> <p><u>*suggestion to move this paragraph to section 2.1 on objectives (Indonesia)</u></p>	
Para 51	<p>Governmental actors are invited to use the VGFSyN as a tool to undertake new initiatives toward the transformation of food systems to make them more sustainable and capable of delivering healthy diets. These include <b>identifying policy opportunities, fostering a transparent and open dialogue, promoting coordination mechanisms, and establishing or strengthening existing, multistakeholder platforms, partnerships, processes and frameworks</b>, such as the Scaling Up Nutrition (SUN) Movement <u>or Nutrition for Growth (N4G), and the One Planet network’s Sustainable Food Systems Programme, ensuring that all relevant stakeholders, including representatives of the most nutritionally-vulnerable groups, are involved and engaged, and promoting policy coherence.- Multi-stakeholder dialogues in countries are needed to discuss pathways for transformation and to analyze where, whether and why evidence-based nutrition-specific and nutrition-sensitive interventions are needed in order to apply the VGFSyN.</u></p> <p><u>* proposed deletion of reference to SUN Movement (Brazil)</u></p> <p><u>* proposed additional text to highlight role of SUN Movement (UNN4SUN)</u></p> <p><u>* request to add reference to other examples, such as the Global Panel for Agriculture and Food Systems for Nutrition, Global Nutrition Report, etc (FAO)</u></p> <p><u>* request to refer to “sustainable and healthy diets” (Switzerland, EU)</u></p>	Switzerland, Brazil, UNN4SUN, FAO, EU
Para 52	<p>Parliamentarians and their <u>national, sub-national and regional</u> <del>and sub-regional</del> alliances <u>have play</u> a key role in <b>promoting the adoption of policies, establishing appropriate legislative and regulatory frameworks</b>, raising awareness and promoting dialogue among relevant stakeholders, and allocating resources for the implementation of laws and programmes dealing with food systems and nutrition.</p> <p><u>* request that legally binding actions, for example those based on human rights legislature, or packaged under a framework convention are considered in 4.1. The guidelines should reference obligations in national and international law more explicitly. Monitoring of the Guidelines should refer to existing frameworks such as the work done on the Right to Food Monitoring/ Indicators by FAO. In addition, the principles for the assessment framework towards sustainable food systems should be linked to the principles defined in the GSF (CSM)</u></p>	EU, CSM

4.2 - BUILDING AND STRENGTHENING CAPACITY FOR IMPLEMENTATION		
Para 53	<p>Governmental actors, <del>supported by donors and financing institutions,</del> need <b>to mobilize adequate financial, technical and human resources, and encourage international cooperation</b> to increase the human and institutional capacity of countries to implement the VGFSyN and to identify priorities toward their operationalization and monitoring at the <del>international, regional,</del> national and local levels. Technical agencies of the UN, bilateral cooperation <del>agencies and other financing mechanisms</del> development partners can assist in this regard. The organization of multistakeholder workshops and training, as well as the development of user-friendly and technical guides, <del>deployed via extension services and digital means, are important to</del> aid in contextualizing and adapt to local contexts. <u>Governments are encouraged to use rigorous evidence-based monitoring and evaluation approaches focused on learning what works and adaptation to achieve maximum results.</u></p> <p><i>*suggested additional paragraph at the beginning of this section: “To achieve sustainable results at scale particularly at country level, a <b>system-wide capacity development approach</b> needs to be applied that empowers people, strengthens organizations, institutions, networks, multi-stakeholder platforms and processes as well as a more conducive policy environment, particularly among nutrition and food system actors, to reshape food systems in a country-driven matter to deliver balanced healthy and sustainable diets, and to promote adequate food habits” (FAO)</i></p>	EU, Indonesia, USA, FAO
Para 54	<p>Donors, financing institutions, <del>intergovernmental organizations</del> and other funding entities are encouraged to <b>apply the VGFSyN when formulating their policies for loans, grants and programmes</b> to support <del>both rights holders’ and duty bearers’ endeavours</del> beneficiaries and implementing agencies’ efforts. The VGFSyN should contribute to the design of <del>responsible</del> investments that aim to increase <del>in a sustainable manner</del> the production, affordability, and access to diverse, <del>sustainably produced</del> and nutritious food, as well as to promote the integration of <del>environmental,</del> nutrition and health dimensions into agriculture and food sector investment plans, as well as to promote the integration of sustainable agriculture and food system dimensions into <del>environmental,</del> nutrition and health investment plans.</p>	EU, Indonesia, USA
Para 55	<p><del>[Development partners,] technical agencies of the UN</del> intergovernmental organizations, including the Rome-based Agencies, and regional organizations are encouraged to <b>support efforts, with their existing resources and mandates, by Governmental actors</b> to implement the VGFSyN. Such support could include research and technical cooperation, financial assistance, the provision of evidence-based policy advice, institutional capacity development, <del>support to develop monitoring frameworks,</del> knowledge sharing and exchange of experiences, <del>[and assistance in developing national and regional policies].</del> Actions should be taken to improve partners’ capacity to design, manage and participate in multistakeholder partnerships, to ensure transparency and accountability and promote good governance for effective results. Moreover, UN interagency coordination mechanisms for nutrition could be leveraged to support the uptake of the</p>	WFP, EU, FAO, USA

	VGFSyN at country level.	
Para 56	National and international research organizations, <a href="#">intergovernmental organizations</a> , academic institutions, and universities should <b>provide and translate the knowledge, innovation, science, and evidence on all dimensions of food systems</b> (including citizen/consumer demand and behaviour change) to enable governmental actors and other food system stakeholders to <a href="#">develop monitoring frameworks</a> , examine the evidence, prioritize issues to be considered, evaluate impacts, and address potential <a href="#">synergies and</a> trade-offs.	WFP, EU, FAO
Para 57	The dissemination and uptake of the VGFSyN can be facilitated through the <b>identification of “champions” and “change agents”</b> , especially among <a href="#">private enterprises and</a> civil society <a href="#">organizations</a> , <del>who that</del> could raise awareness <a href="#">and organize advocacy campaigns</a> across sectors and different governmental levels, <del>and the organization of advocacy campaigns at different levels.</del>	EU, USA
<b>4.3 – <del>MONITORING</del> USE AND APPLICATION OF THE VGFSyN</b>		Indonesia
Para 58	Governmental actors, in consultation with relevant stakeholders, <a href="#">in particular civil society organizations and food producers</a> , should <b>define national policy priorities and related indicators, mobilize regional and local structures to report on these indicators, and establish or strengthen existing monitoring and reporting systems</b> in order to assess the efficiency of laws, policies and regulations, and implement appropriate remedial actions in case of negative impacts or gaps.  <a href="#">* request to make reference to guiding principles, especially 32c, “accountability, transparency and participation” to underline the need for inclusive, participatory and gender-sensible monitoring processes. Need to refer also to VGGT, 26.2 (CSM)</a>	EU, CSM
Para 59	By <del>implementing</del> <a href="#">applying</a> the VGFSyN, governmental actors are expected to <b>contribute to the achievement of the six Global Nutrition Targets (2025)</b> endorsed by the WHA in 2012 <b>and its diet related NCD targets</b> . The VGFSyN should support countries in defining priority actions and formulating “SMART” commitments in order to achieve <a href="#">environmental, health and</a> nutrition objectives <del>as well as to promote the creation of informal coalitions of countries</del> to accelerate and align efforts <del>around specific topics</del> linked to [one or more action areas of] the Nutrition Decade and the 2030 Agenda <a href="#">for Sustainable Development</a> . This can be done through advocating for policies and legislation, allowing the exchange of <a href="#">best</a> practices and experiences, highlighting successes and lessons learned, and providing mutual support to accelerate implementation.	EU, Thailand

	<u>* request to clarify what SMART means (Thailand)</u>	
Para 60	<p>CFS should include the VGFSyN in its ongoing work <u>and its existing funding resources</u> on monitoring, relying as much as possible on existing mechanisms. <b>CFS should organize <u>from voluntary contributions</u> a Global Thematic Event</b> where all relevant stakeholders can learn from the experiences of others in applying them and assess their continued relevance, effectiveness and impact on <u>sustainable food systems and</u> food security and nutrition.</p> <p><u>*proposed addition on reporting exercise on implementation of VGFSyN (FAO)</u></p> <p><u>* proposed deletion of this paragraph (USA)</u></p> <p><u>*request to add a paragraph on accountability mechanisms to promote implementation (UNN)</u></p> <p><u>*additional proposed paragraph: “Governments (duty bearers), in inclusive and participatory consultation with claim holders, especially marginalized groups in the food systems, should develop new indicators for assessing food systems which evaluate their contribution to healthy and sustainable diets, conservation of natural resources, social justice, equity and cultural respect” (CSM)</u></p>	FAO, EU, USA, UNN4SUN

## **ANNEX 1 – ADDITIONAL GENERAL COMMENTS BY THE CIVIL SOCIETY MECHANISM (CSM)**

### Text after title of section 1.1

This section should trigger the real and urgent need to transform our food systems. Therefore, it should recognize that the current hegemonic food system with an agro-industrial production model is not only unable to respond to the existing malnutrition problems but have also contributed to the creation of different forms of malnutrition and the decrease of the diversity and quality of our food and diets, the environmental destruction and climate crisis, and the health emergency that we are witnessing. In this regard, it has become clear that the structural drivers of zoonotic infectious diseases such as SARS Cov-2 are an elementary part of current food systems as they are closely related to industrial agriculture and livestock breeding. The expansion of agriculture has lead and leads to high rates of deforestation and the reduction of biodiversity, thus reducing the resilience of ecosystems. Although we see references to some of these elements in this first section, they appear to be fragmented and analysed only at their surface.

From paragraph 1 until paragraph 13 a sequential analysis of the root causes of malnutrition and failures of the current food systems to:

- ensure the right to adequate food for all with all its interrelated and indivisible rights and
- protect the environment with its related ecosystems needs to be done.

The comments on the content and depth of the analysis that should be undertaken by the guidelines can be found on the respective paragraphs. However, it is crucial to strengthen the interrelations of the points in order to have a holistic understanding of how today's prevalent unhealthy and unsustainable diets are just the result of a failure in the system to provide and prioritize food that is equitable, just and produced in respect of the ecosystem and people living within it. Such an analysis should therefore strengthen successive paragraphs (13 until 19) to include which are the fundamental changes needed to transform food systems. This could also be the place to include the rationale for the need to have assessment of food systems in all their dimensions (ecological, social, health, economic...). The assessment would be a concept tightly linked to the guiding principles of the guidelines.

More in particular, reshaping of food systems must focus on how to achieve sustainable healthy diets for all. The background and rationale should expose how nutrition is foundational for personal development as well as for a harmonic collective relationship with nature. It should give a comprehensive understanding to the food-ecological-social-health nexus and re-consider nutrition as a critical space of systemic convergence and coherence across different policy domains – this was a clear demand throughout all the Regional Consultations. The systemic approach, one that explores the interconnections between ecology, agriculture, food, and human health, which has been requested by so many CFS members and participants (including the CSM) throughout the whole process must be central throughout the document. Repositioning food in nature 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.

This section should pave the way towards critical issues which could be underpinned in the key concepts and that should overarch the totality of the Voluntary Guidelines (guiding principles). These include:

- Centrality of people, in particular small-scale food producers and women, and their agency in shaping food systems and dietary outcomes. The primary focus should be on the people most affected by malnutrition in all its forms so as to overcome the challenges they face;
- Reshaping food systems is to be centrally based on and contribute to the realization of the right to adequate food. This requires systemic rather than sectoral changes, and overall policy coherence with the right to food. It also requires a focus on the basic and root causes of malnutrition, and on the groups most affected; as well as on new determinants such as the climate crisis and dematerialization of food;
- Transformation must contribute to the realization of human rights overall, given their indivisibility and interrelatedness - Definition of healthy and sustainable diets from Draft one. This key concept should be the basis of guidance to ensure that diets are affordable, balanced and varied, and provide the nutrients required to live a healthy and active life for both present and future generations. Sustainable food systems should be able to provide sustainable healthy diets. If the understanding of food as the locus of nexuses between social, economic, health, environmental and labour dimensions is achieved, then the concept of sustainable healthy diets for all should be the immediate outcome of food systems which are both sustainable and equitable.
- Healthy diets require a healthy planet

#### Text after title of section 2.1

The will of a profound transformation of current food systems has to be highlighted as an overarching goal in all parts of the VGFSyN and find its materialization in Part 3. To this regard, the recommendations of the regional consultations must be reflected in the Guidelines.

The normative direction of the transformation has to be very clear:

1. to contribute to the realization of the right to adequate food. In line with this, the transformation towards more equitable and sustainable food systems has to be first and foremost for the benefit of the groups most marginalized and discriminated by current food systems. Prioritization of the groups marginalized and discriminated by current food systems is mandatory under human rights law. In this sense, they should have a special mention while addressing the overall goal and purpose of the Guidelines. They should be the ones benefitting from a transition towards sustainable and equitable food systems. This requires systemic rather than sectoral changes, and overall policy coherence with the right to food. It also requires a focus on the basic and root causes of malnutrition; as well as on new determinants such as the climate crisis and dematerialization of food;

2. amidst the COVID crisis, to prevent crises. In this sense, the lessons which are arising and will emerge from the COVID crisis, should cut across the entire document and promote the urgent transformation of food systems to make them resilient, sustainable, equitable and healthy. If addressed within the document, a separate section merely on the COVID crisis should not be created, which would only undermine the scope of the Guidelines.

Furthermore, the VGFSyN in its current draft cannot meet the important goal of addressing policy fragmentation. It should be addressed through a systemic approach, one that explores the interconnections between ecology, agriculture, food, and human health. The aggregation of elements presented by the current draft does not build a system, due to the lack of visualization of the connections between them. Learnings from the regional consultations should be included at this purpose.

#### Text after title of section 2.3

The guiding principles should emerge from the analysis made in the background and rationale. An analysis that presents current food systems as dysfunctional as they result in unhealthy diets, unsustainable footprints and impoverishments of small-scale producers. They are the outcome of a supply-driven and macroeconomic approach to commodified food, which itself has shaped to a large extent research to date.

In this sense, the title should emphasize that the dominating food system, namely the global industrial one, needs to be transformed. Despite this, the report is biased towards industrial-scale food production to the detriment of family farming. While increased dietary diversity is certainly needed, priority should be given to making the best of local biodiversity and ecosystems, contributing to the resilience of local food systems. In this sense, areas most affected by the today's crisis are those most dependent on international trade.

This section should serve as assessment of whether future food systems will be sustainable or not according to these guiding principles and most importantly the realization of the right to adequate food for all (see also comments on Part IV on Implementation and Monitoring).

We reaffirm the necessary centrality of human rights in any normative framework agreed by the CFS, not only with respect to the Right to Adequate Food but equally to the right to health, the rights of workers, peasants, fishers and Indigenous Peoples, the rights of women, the rights of children and other related rights. A clear reference to all these rights must be included in the Guiding Principles.

#### Text after paragraph 34

We agree with the statement made here but are concerned that the VGFSyN fail to fully adopt this food system approach, because they are too focused on a medicalized understanding of food systems and diets and do not include in an appropriate manner ecological, cultural and social dimensions, the

power imbalances that shape current food systems, alternative forms of knowledge and other important aspects. As we explain in other comments, the separation of healthy and sustainable diets, the focus on food safety and the restriction in point 3.2. to “sustainable food supplies for improved nutrition” instead of “Sustainable food systems for healthy and sustainable diets” are clear indications for a lack of a food systems approach.

Furthermore, the VGFSyN lack of acknowledging the importance of public goods and fail to rely on pathways that have already proved to be transformational, such as agroecology.

In this sense, the COVID crisis has exposed the centrality of public systems as bulwarks against public health disasters, and the impacts of decades of undermining of public services through austerity measures, privatization, neoliberal economic policies, and public-private partnerships. We therefore call for the Guidelines to be primarily directed to informing public policies and systems, reclaiming the public nature of food systems, and the centrality of healthy and sustainable diets in reclaiming our commons and advancing a deeper understanding of how public goods and services can strengthen the Right to adequate food and nutrition, as well as food security and nutrition.

#### Text after title of section 3.1

In the light of the current crisis, more than ever the centrality should be put at the heart of public interest. Collaboration among the different sectors and levels of governments should allow an equitable distribution of investment and actions promoting sufficient production and adequate, resilient and sustainable and healthy food systems for all. Building on multi-sectoral actions and coordination will be essential but “inclusive dialogue” must be managed to ensure vested interests do not influence public policy.

In leadership, governance, and accountability, the issue of conflict of interest must be paramount, with mechanisms for monitoring and reporting all forms of corporate capture to government, scientific, academic, civil, educational, and other sectors.

It is critical to include in this section a reference to the need for effective safeguards against conflict of interest (CoI) and other safeguards that ensure governance is based on human rights and public interest. Reference can be made to the ICN2 Framework for Action, which has clearly spelled out this need (Recommendation 3). Beyond regulating the direct and indirect participation of the private sector in public policy and program development and implementation, CoI and other safeguards should guarantee:

- the trustworthiness of data collection and knowledge generation in research and monitoring processes;
- the financial independence of public spaces, programs, and education. These should be free of conflicts of interest.

### Text after title of section 3.2

In accordance to the comments made before the title should be changed to emphasize that not only food supplies need to be sustainable in all dimensions but the totality of food systems. The current title assumes linearity and undermines the benefits of short-circuited chains for nutrition, sustainability and livelihoods. These guidelines should include recommendations relating to the promotion of methods that serve to shorten food chains, avoidance/limitation of processing and reduction of distances between consumers and producers. These approaches have nutrition, health, economic and sustainability benefits. It would be more appropriate to talk about sustainable food systems (referring to definition on comment about point 14) rather than “sustainable food supplies”.

Furthermore, this section welcomes all approaches to achieve “sustainable” food systems, suggesting that the coexistence of all modes of productions is possible. This section would benefit greatly from the interlinkages with the CFS process on “Agroecological approaches and other innovations” to include the assessment framework on ecological footprint and agency (e.g. risks of pesticide use for producers, consumers and the environment). Agroecology has in this sense proven to be a true transformational pathway towards encompassing food, equity, human and planetary health. Instead of the concept of food security, the VGFSyN should turn to the concept of food sovereignty, as it offers paths for the necessary transformation to localized, just, sustainable and healthy food systems.

Finally, the term “improved diets and nutrition” is not adequate as it cuts short of the full scope of sustainability that food can serve, from environmental to economic, social and cultural. The term should be replaced with “sustainable healthy diets”. This calls upon governmental actors to regulate nutritional labelling and consider front-of-pack interpretive labelling (FOPL), for example, warning labelling, to promote sustainable healthy diets. This also deserves to be distinguished explicitly from seeing fortification as the only solution to contribute to healthy diets (refer to comment on point 3).

### Text after title of section 3.2.1

All the points in 3.2.1. are based on an approach that understands climate change exclusively as a natural phenomenon, an approach, which relies on a conventional understanding of food production (agro-industrial food production, linear value chain approach without a food system approach) and sees this model as the only solution. However, the ecological crisis we are facing result in great part from this model. Sustainability should not be merely seen through the climate lens as a “pre-condition” which leads purely to specific solutions on only part of the broader crisis. Instead, transformation of our food systems should take into account the approaches which can adapt, mitigate and instore resilience to the current climatic and ecological context. In this sense, assessment frameworks should be put in place to evaluate sustainability in this systematic way (not only climate related, but also soil, biodiversity and land degradation on the ecological side, and social aspects too). Referring to the Policy Recommendations on “Agroecological and other Innovative approaches” would be therefore useful in this regard. More in particular, the agroecological approach is a kind of innovation that includes the assessment framework on ecological footprint and agency.

### Text after title of section 322

Currently, the notions of 'biodiversity loss' and 'sustainable use' are weak. On-farm (or in-situ) conservation of agricultural biodiversity plays, however, a critical role. In this sense, the Guidelines should include the need for the protection of agricultural biodiversity and people's bioculturality, to ensure sustainable food systems. This diversity, in seeds, animal breeds and traditional and Indigenous plant varieties is key to sustainable food systems. Equally important are the diverse knowledge systems that help maintain, co-create and INCREASE biodiversity within a particular species of plant. For example, farmer-breeders in Central America have developed, and are keeping alive, hundreds of varieties of beans -- in the centre of diversity. Furthermore, these guidelines should explicitly uphold the critical role of the world's peasant, smallholder farmer, and food provisioner community as the guardians of agricultural biodiversity. This also relates to food sovereignty of course, as farmers and food provisioners who have more control over agricultural biodiversity are able to build more resilient food systems.

### Text after title of section 3.3

Sustainability aspects are lacking. Healthy and sustainable diets should be available, accessible and affordable. Factors for overcoming social injustice and social determinants of malnutrition should therefore be considered.

Incentives for healthy, diverse, fresh and sustainable food options are lacking when they are less affordable, accessible and available compared to processed and packaged food. Research on “food deserts” refers to those gaps in food provisioning and to the lack of access to high quality and nutritionally appropriate food (Del Casino Jr, V. J. (2015). Social geography I: food. Progress in Human Geography, 39(6), 800-808). VGFSyN should put more emphasis on the issue of access to local, healthy, diverse and fresh food and the strategies of government actors to achieve this.

### Text after title of section 373

A resilient food system implies concrete conditions of work, production, supply, etc. We know that there are regions whose food systems are disrupted by natural disasters (effects of climate change) as well as wars and armed conflicts etc. The consequences of catastrophic climate change have destroyed the livelihoods of indigenous and local populations, who include agropastoralists, fisher-folk, smallholders and rural workers. Further, hundreds of thousands of people are displaced or refugees in neighbouring countries fleeing insecurity and human rights violations.

We would suggest adding a paragraph on state failure. We know that in several regions of the world, states have failed to meet even the most basic needs of population groups and/or to enabling them to take control of their own welfare in times of crisis; instead, these groups have been left in a permanent dependence on aid, despite the opportunities for productive activities. Governance that is unsuited to the traditions and customs of indigenous peoples has destabilized good traditional and social management practices, leading both to the inadequacy of basic social services, which are highly inadequate, and to the creation of a climate of intercommunity mistrust.

Marginalized groups should be able to assume responsibility for resource management in their food systems – including adaptation to crises and natural disasters—and governments should support these capacities.

Food security and nutrition assessments and analyses should not be limited to humanitarian actions alone, but should also highlight the level of economic recovery, the state of resources and the opportunities to be developed in the regions, including the knowledge of local populations in relation to the strengthening of local food systems. It is therefore key to strengthen the right to food and not to fall into “charity” approaches.