

## **CSM Comments on Zero Draft of HLPE Report on Nutrition & Food Systems (Dec 2016)**

*This document conveys the comments of the Civil Society Mechanism (CSM). Despite the language restriction (the English-only text significantly limits the capacity of non-English speaking constituencies to participate in this important step), this document conveys the collective comments of the broad array of civil society constituencies that actively participate in the CSM/CFS process.*

### **I. OVERARCHING COMMENTS**

#### **1. Report's structure and content is not conducive to inform policy-making**

The HLPE has the specific objective to “improve the robustness for policy making” and the guidance note to the consultation response states that the report aims to be “solution oriented and to highlight effective policies and programmes”. Yet solutions aren't addressed until p.67 of the draft report. The report's exaggerated length and lack of clear focus, makes it unlikely that decision-makers will engage with it, and makes thus unlikely that it will have significant policy impact. Furthermore, due to the lack of flow between and across the chapters there is no clear indication as to what policy recommendations will be suggested and where the report is headed. There is also a notable gap between the analysis of causes, consequences and drivers of malnutrition (chapters 2 and 3) and the conclusions (chapter 4).

The CSM recommends restructuring the report so that the policy implications and options come much earlier in the report, separating more clearly the policy content (upfront) from the supporting evidence. **The recommendation would therefore be to move much of the information in Chapter 2 and 3 with regard to the discussion of the Burden and “Changing Diets-what do diets look like currently?” into the supporting evidence section/annex. Similarly, many of the case studies can be moved in the annex while maintaining the analysis and conclusions gleaned from case studies in the body of the report.** In order to shorten the document, one could summarize the description of nutritional problems and their consequences as they have regularly been presented in recent years. Then, more time could be spent on elaborating on the drivers of dietary change and the possible policy approaches.

The introduction and initial framing of the report need improvement. **There is no adequate contextualization of the nutrition and food system nexus in the broader nutrition policy challenge.** In particular, there is no adequate mention of how governance weaknesses, the fragmentation of nutrition policies and programmes, the medicalization of many nutrition interventions and the dis-embedding of nutrition with food, the flouting of legal frameworks and regulations, and the continued violations and abuses of human rights, are actively contributing to shaping the profile of malnutrition. The Right to Food (which should be referred to as Right to Adequate Food in line with the deliberations of the CFS OEWG on Nutrition) appears in a list as a ‘political agenda’; climate change is not even mentioned. As usual, assumed population dynamics and demand/production challenges emerge as primary shapers of the analysis.

In terms of recommendations, **the report should formulate the specific priority policy changes that need to be made at the local, national, regional and global level** and that would lead to the most sustainable and significant impact in tackling malnutrition in all its forms. **It should also stress policy coherence to ensure policies across sectors are harmonized to fulfill the Right to Adequate Food and Nutrition.** It is not enough for countries to implement policies in a piecemeal fashion, to ensure food system change and nutritional health, there needs to be cross-sector implementation and harmonization of policies.

## ***2. Lack of completeness of Zero Draft***

Critical elements in the Zero Draft are missing, rendering the public consultation process ineffective. These omissions make it impossible to get an overall sense of the key messages, recommendations and character of the report as well as the position of the HLPE on specific topics that are of primary concern for the CSM. Omissions include: The Summary and Recommendations (p.8); **the sections on food system typologies and their impacts on diets and nutrition (p.21, 66)—which is considered a primary objective of the report;** information on SUN in the International Advocacy and Cooperation Section (p.104); Public-Private Partnerships (p.105); Conflicts of Interest section (p.106); “other movements” in the Movements for Nutrition section (p.106), among others. One of the main aims of HLPE reports is to provide guidance on controversial issues to assist the CFS in making decisions that are based on independent evidence, free of conflict of interest, however, most of the controversial issues have been left blank which makes it impossible to predict the types of policy recommendations and final arguments the document will put forward. **It is essential to provide further opportunities for public consultation on these missing parts as they will crucially shape the final outcome.**

## ***3. Lack of contextualization within CFS Mandate [the progressive realization of RTF]***

The work of the HLPE (according to the HLPE Key Elements document) is directly linked to that of the CFS with the intention that HLPE studies can be inserted into “a concrete political agenda at the international level”. For this reason, the work of the HLPE must be contextualized within the overall mandate of the CFS, which is to ensure the progressive realization to the right to food. It is essential that the report analyses food systems with an understanding of which food systems (or components thereof) undermine the right to food and related human rights and which systems, in contrast, are compliant with and contribute to the furthering of human rights. Grounding the analysis in human rights, and in particular the right to food, is central for ensuring that the policy recommendations of the report are aligned with the mandate of the CFS.

Given the interrelatedness and indivisibility of human rights as well as the CFS mandate to ensure policy coherence across sectors, it is central that the report’s analysis **does not limit itself to identifying which food systems ensure nutritious diets but also takes into account the broader human rights outcomes. This includes the impacts on access and control over natural resources, biodiversity, worker’s rights, women’s rights, children’s rights, indigenous rights and the right to health.** A food system that ensures healthy diets but degrades the soil and denies workers a right to a dignified life is not a food system that protects human rights, nor one that should be promoted.

Hence, the analysis (especially conceptual framework, case studies, typologies of food systems and recommendations) must be firmly grounded in the human rights framework present in the CFS mandate and the principle of indivisibility of rights. This will ensure that the food systems that are promoted for health do not have unintended consequences on the environment or people’s livelihoods. Furthermore, it needs to be made clear that human rights violations, including violence against women and ethnic groups, are major causes of malnutrition.

#### *4. Conceptual framework grossly inadequate to FSN policy making*

Many different conceptual frameworks are possible to expose the relations and dynamics that connect food systems with nutrition and diets. The one that has been proposed, while it could be factually correct, is profoundly inadequate to the policy objectives of this process as it does not expose the real tensions that influence dietary choices. These emerge from the tension between the hegemonic global industrial food system, with its homogenising concept of modernity, and the local food systems embedded in their cultural heritage. **Diets represent one of the many battlefields between these two alternative approaches to food production, marketing and distribution.** While they may at times cohabit, the industrial system tends to squeeze the local food systems through many different points of attrition (from access to resources and inputs to distribution channels). **Without excessive generalizations, the two systems have profoundly different health, environmental and livelihoods implications on nutrition and diets. The conceptual framework should expose them and therefore highlight possible hot spots for normative interventions.** As it stands, many of the elements of the proposed framework hide these tensions within the various components and do not therefore highlight useful pathways for policy action.

Four immediate consequences become apparent from this critique. Firstly, it is not possible to develop the framework without defining the typology of food systems (see next item 6 below), precisely because the framework is based on the tension between some of these typologies. **Secondly, there is an excessive focus on healthy diets rather than on a more holistic understanding of diets (imposed by the FSN focus) that includes the environmental footprint and the livelihoods/economic consequences of dietary choices that provide the feedback loop with production.** While this broader understanding of diets is at times mentioned, it is not systematically taken into account. In fact, the report often retrenches on “healthy diets” without examining which diets are sustainable from a Right to Food point of view, or from a sustainable development, climate mitigation, livelihoods support point of view. Furthermore, discussion of healthy diets should mention that freshly prepared meals are healthy and more nutritious than ultra-processed, pre-prepared foods. This distinction is not made.

Thirdly, there is inadequate focus on the nature and characteristics of markets, although they are a key locus where dietary choices are made. Indeed, the increasing acquisition of control over marketing and distribution channels by the industrial system is fundamentally altering the capacity of markets to facilitate direct interaction between producers and consumers. This is not clearly exposed by the proposed framework while having been of the key focus of the most recent set of CFS policy recommendations on connecting smallholders to markets. And lastly, the concept of consumer needs to be problematized and de-linked from monetary purchasing power (as in item 5 below) as consumers include those who consume but do not necessarily purchase their food (for example children who receive free meals in school are consumers but they neither pay nor often choose their food). Furthermore, consumer behaviour is seen as influenced by choice while this is often not the case because consumer choices and behaviours are shaped by structures and environments beyond their control. This should be a re-conceptualized in the report.

### *5. Need for stronger focus on groups most affected by malnutrition and food insecurity*

The emphasis of the report on consumers is too narrow and does not allow for comprehensive food systems interventions in line with the progressive realization of the right to food. It completely leaves aside the essential role and critical situation of small-scale food producers, especially women producers, which not only produce the majority of the world's food but are also among the groups most affected by food insecurity and malnutrition. The focus of the report should be on protecting and promoting food systems that are compliant with the right to food, with a particular emphasis on disadvantaged and marginalised groups. **In particular, in Chapter 2 (burden), the situation must not just offer regional figures but must show marked differences in indigenous groups, children of peasants and other groups who experience higher stunting and undernutrition prevalence due to political, social and economic marginalization and discrimination. In Chapter 3, the drivers shaping malnutrition of these particular groups must be highlighted and in Chapter 4, solutions must be assessed according to their ability to address the challenges faced by them.** Placing those most affected by food insecurity and malnutrition at the centre of the report also implies that their subjective experiences, analysis, and perceptions as to the causes and solutions to their conditions of malnutrition should be equally central to the development of the report's arguments. **This exposes the inadequacy of the almost exclusive reliance on so-called scientific knowledge versus traditional and experiential knowledge on nutrition and diets (as elaborated in item 11 below).**

On this issue, there is also a concern with the language used in the report, which is often quite victimizing, rather than portraying those affected by malnutrition as subjects of rights. Rather than referring to "special needs" or "vulnerable groups", the report should highlight differences in nutritional requirements based on many factors, including age and gender. Similarly, it is not the people that are vulnerable but rather their situation/environment that places them at higher risk/vulnerability to malnutrition. This difference is central as the focus should be on changing the factors that create such environments rather than assuming an 'assistentialist' approach of helping the needy. Furthermore, in multiple places and in different contexts (7 times), the Zero Draft refers to "the poor", which is a depersonalizing pejorative phrasing. What we are really talking about is "those individuals and groups rendered poor by an unfair economic system". Along the same vein, the report should refer to "disparity reduction" rather than poverty alleviation or reduction.

### *6. Absence of food system typologies and concern with hinted methodology*

As mentioned in items 2 and 4 above, the lack of food system typologies is one of the major problems of the Zero Draft. However, rather than creating new typologies based on arbitrary indicators (and sources) of food systems, the report should **build on existing comparisons between industrial food systems and those based on agroecology and small-scale food producers**, recognizing that there exists a global system (singular) and countless regional, national and local systems (plural). Rather than trying to categorize countries' food systems, the report should concentrate on identifying elements/characteristics in food systems that promote or undermine nutrition, and the policies, which underpin these.

In line with the definition of sustainable food systems in the report, criteria for assessment of these different systems should be the social, economic and environmental sustainability of a food system, its effects on health and nutrition and its alignment with human rights, and particularly its contribution to the progressive realization of the right to adequate food. Table 2 (p. 22) on indicators for each food system element should include indicators covering each

of these dimensions, e.g. CO<sup>2</sup> emissions, chemical fertilizer, pesticide and water use, excess of nitrogen from agricultural production, and (agro)biodiversity for the ecological dimension, among others.

Quantitative statistics and indicators are only useful if accompanied by a more comprehensive analysis/explanation of influencing factors (which are often complex), moreover it is essential to look at disaggregated data on how specific population groups are affected by different food systems (see previous item). Furthermore, currently, the food systems typology section at present indicates that the indicators chosen do not include information related to health, diet or nutrition but rather they just identify drivers along the food chain. This begets the question; how will these indicators get us closer to understanding which food systems promote nutritious and sustainable diets?

As included in Table 2, “percent imported foods/total food supply” could be a key variable to characterize the relative mix of food system types from a food security/sovereignty perspective (not just countries and the production element as per Table 2).

### *7. Over-emphasis on value chains rather than on short circuits and circular economies*

The CSM suggests using the term food or supply chain rather than value chain. Implicit in the term value chain is that value accrues along the chain, which even according to the report is not true. In addition to discussing how value moves along the chain, figures 27, 29 should also indicate for-profit hikes and distortions of food prices that happen along the chain as foods move from producers to consumers. The discussion of value chains assumes linearity and makes no mention of circular value chains and short supply chains (as opposed to retail-driven supply chains) and the benefits of these for nutrition, sustainability and livelihoods. There should be discussion and recommendations relating to the promotion of community supported agriculture, direct consumer-producer relationships, urban agriculture, farmer’s markets and other methods that serve to shorten food chains because these approaches have nutrition, health, economic and sustainability benefits.

Furthermore, the elements of processing that occurs along the food chain are generally viewed positively, despite the recognition even in the report that nutritional qualities are often lost as primary produce moves along the chain. The potential harms of food processing include loss of nutrients such as fibre, phenolics, minerals, healthy fatty acids and vitamins while also leading to the introduction of harmful additions such as sodium, other preservatives, trans fats and other compounds (Mozaffarian et al 2016). Despite these nutrition losses, little attention is devoted to avoid/limit processing and reduce distances between consumers and producers.

### *8. Failure to problematize the industrial food system, incl. Big Food & Beverage Industry*

**The industrial food system should be assessed as a problem rather than a solution to malnutrition.** Production processes and agro-ecology based food systems driven by small and medium scale producers must permeate the whole analysis which is currently slanted towards industrial value chains, including and especially Figure 1 and other later figures on food system interventions. The report fails to openly address the profound challenges posed by the industrial, globalized food system. **The globalization and increasing concentration of global industrial food system**, its lack of sustainability and its impact on the nutritional content of food is superficially mentioned in the introduction, but not really developed throughout the report. **The dimensions of standardization and growing uniformity of food**

**and diets should be part of the analysis of industrial food systems and value chains to be developed in the report.** While pretending to be “neutral” (e.g., p.9 para 2), it is indeed highly political to avoid such discussion. Many sections of the report (pro-liberalization, pro-intensification) are clearly biased towards the continued expansion of the industrial food systems while introducing superficial fixes, avoiding a real debate on the issue. Other parts of the report, while recognizing biodiversity loss, depletion of natural resources, and negative human impact on ecosystems and effects on nutrition, fall short of analysing the underlying causes of these problems, and the role of the agro-industrial food system and the public policies (e.g., subsidies) that support and maintain it. Similarly, climate change is presented as a “given” to which food systems need to be adjusted (“the world is experiencing climate change”), without any discussion on the role of the industrial food system in actually contributing to climate change and environmental destruction. The urgent need to fundamentally transform food systems (rather than adding mere technological fixes) is therefore missed (see UNCTAD review 2013 and IPES report - full references below).

Indeed, there is an emerging consensus on the need for a change of paradigm. Present food systems are dysfunctional because 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. The research principles agreed upon by IPES-food should lead the way for joint learning to guide food systems transition in the coming years. Despite this, the report is biased towards industrial-scale food production to the detriment of farming families. While increased dietary diversity is certainly needed, priority should be given to making the best of local biodiversity and ecosystems, which should of course be complemented through fair trade of quality products. This contributes to resilience of local food systems: areas most affected by the 2008 food crisis were those most dependent on international trade.

This is one of the central controversies that the report does not adequately confront, but rather falls on one side in its selection of sources. There should be more substance on the food sovereignty debate as well as on systems that are based on small-scale producers. This is a core weakness of the report; small farm-based food systems provide 80% of food in Asia and Sub-Saharan Africa (as referenced) are reduced to allusions to “vulnerable groups” (4.2.2).

In addition to the role played by industrial agriculture in shaping the food system, **the Big Food and Beverage Industry and transnational food companies play a pernicious role in shaping consumption practices, the food environment and also shaping food perceptions, preferences, by flooding the market with ultra-processed foods, through their unsustainable production practices and through marketing.** The global industrial food system of transnational food manufacturing, distribution, catering and retailing corporations have had a central impact on food systems and supplies throughout the world but its role in changing food practices is barely mentioned in Chapter 3, when drivers shaping diets are discussed. Furthermore, these companies launch campaigns and fund science to frame debates about malnutrition, especially obesity to take the blame for these health problems away from their products. They also lobby governments and actors in the international nutrition space to influence policy-making processes. The power of transnational food corporations is hardly mentioned but it plays a key role in driving and impacting diets and nutrition and must be discussed in section 3.2 (food system drivers) and 4.2.2 (food system changes). It also should be referred to in the section on Conflicts of Interest and PPPs.

Lastly, the report needs to give **greater attention to the role of ultra-processed foods in the food system.** Clear links between the consumption of ultra-processed foods and sugary

drinks and overweight and obesity have been established (PAHO, 2015, Montiero 2013). It is important for this relationship to be drawn out to ensure that policies work to curb the availability and consumption of these foods and to ensure front of labelling and marketing restrictions for these foods as well as restrictions on health claims. There needs to be a clear mention in section 1.1.2 (the elements of food systems) of 'ultra-processed' foods and the link to obesity should be more clearly articulated. Currently, the term 'ultra-processed foods' is not defined and it is mentioned as if it were a synonym for highly processed foods.

#### ***9. Under-emphasis (if at all) on markets and distribution systems***

**There should be more critical analysis and of the distribution system (in particular critique of the role of hypermarkets and supermarkets) since they are playing the lead role in shaping both consumption and production.** As mentioned in the item #7, it is essential that local markets and short food chains (e.g. farmers' markets) be protected and supported, especially because they are central in promoting food sovereignty. The shift to supermarkets (including in nutrition CCT interventions) has in many cases resulted in degradation of diets and destruction of local food systems. And importing superhighways have often resulted in depleting communities of the food they produced, thus decreasing home consumption, or isolating them from the national commercial system. There is a need to **recognize the vital importance of territorial markets** (local, regional, transnational, more or less formal) in food production, in supplying nutrition to vulnerable groups, and in being key in the livelihoods of those most affected by malnutrition and food insecurity. These markets have been recognized in the recommendations of the CFS in October 2016 (Recommendations on Connecting smallholders to markets). They should be given much more attention as key elements of food systems in the report, counter to the focus on value chains that more often than not refer to global value chains based on industrial agricultural models that risk promoting the standardization of agricultural inputs and production, and to the standardization of diets. There is a need to look at territorial and local food systems and how much nutrition they bring to how many people in the world. Territorial markets strengthen women's jobs, prevent rural-urban migration, reduce carbon footprints and can control food losses through community composting.

#### ***10. Limited analysis on marketing of ultra-processed foods/beverages and labelling***

There needs to be greater emphasis placed on the marketing of foods, in particular, it should be clearly stated that the overwhelming majority of foods and beverages that are marketed to children are ultra-processed foods and beverages which are detrimental to nutritional health and which are produced by transnational corporations not those that are produced locally or sustainably. The document should be aligned with recent documents published by WHO and PAHO (see references at end of document), which discuss the need to regulate marketing to children *and* adolescents. Furthermore, that all media channels should be regulated (TV, internet, packages, mobile phones, video games, packages, point of sale, billboards and areas where children and adolescents congregate). Furthermore, the use of marketing tools that are used to attract children such as the characters, animals, celebrities, freebies, promotions or contests should be banned. Furthermore, the nutritional criteria utilized to regulate what should be permitted to be marketed should be developed free of conflict of interest and follow the WHO-Europe or the PAHO nutrient profiling model. The example of Chile provides an ideal case study for a marketing to children regulation (see specific comments below).

Furthermore, the mention of public service advertising to encourage healthy practices should ensure that such advertising is not funded by the food industry or PPPs, which often leads to messages being skewed towards those that promote ‘better-for-you’ processed foods rather than natural, fresh foods.

**Furthermore, the opportunity of Front-of-Pack Labelling interventions are unduly addressed.** The section on labelling (p. 100) discusses many types of labels but not specifically the front-of-pack label which informs/warns the consumer of the quantity of macronutrients in their foods (i.e. saturated fats, added sugars, sodium and calories). It is important to promote policies for mandatory front-of-pack labelling. The case of the Chilean label would make for the most appropriate case study because it offers an easy-to-understand and simple warning label. The front of pack label must be based on nutritional values developed by experts free of conflict of interest, it should follow international standards such as the WHO Guideline for Sugar and the WHO-Europe and/or the PAHO Nutrient Profile Model (see references at end). It is key that front-of-pack labelling regulations are harmonized with marketing regulations to ensure that the same product, for example, that has a warning label on its package for being high in sugar, does not also have images or messages on the box to attract children to these products. In the case of both of these regulations, statutory not self-regulatory agreements should be promoted, as the latter have been shown to be compromised by conflicts of interest.

#### ***11. Outdated and simplistic assessment of sociocultural drivers***

This section needs a total rewrite (also in view of the following comment n. 12). The section compartmentalizes cultural practices as if they were independent from their historical, political and economic contexts. Such an approach to understanding culture has been discarded as early as the 1960s in the social sciences because it tends to blame “culture” for nutritional and health problems rather than seeing these cultural practices as consequences of political-economic circumstances, governmental regimes, power inequalities, marginalization and history. A description of sociocultural practices should be embedded in this understanding, otherwise the section simply serves to “other-ize” and essentialize cultural differences and leads to the assumption that the way to change cultural practices is through educational efforts rather than by addressing the underlying root (political, economic) causes shaping these practices (See Mintz, Scheper-Hughes). Instead of focusing on religion and taboo, this section should discuss how consumer cultures, marketing as well as globalization and narratives of modernity shape consumption preferences and practices.

#### ***12. Poor gender analysis & lack of recognition of the centrality of women’s rights***

Following on the previous comment, the section on gender should address both the issue of women’s rights as well as provide an adequate gender analysis to support the analysis of the report. It unfortunately falls short of either of these. The fact that these key issues are addressed within a subset of the socio-cultural drivers does provide a very limiting context for really exploring the centrality of the issue. It would deserve a much more prominent role both within its own merit as well as a transversal issue rather than being locked within a small subset of the flow of the discourse.

Violations to women’s rights are important factors shaping malnutrition. These violations must be mentioned in the report and policies to guarantee women’s rights must be

recommended, especially considering that the indivisibility principle of human rights requires that women's rights be guaranteed to ensure the Right to Adequate Food. A clear recognition of women's rights is explicitly mentioned in the most recent set of CFS policy recommendations that followed the HLPE SADL Report and the Nutrition and Food Systems report should follow this critical precedent. The realization of women's rights in the workplace, women's right to land and natural resources, women's sexual and reproductive rights, the right to breastfeed, to education and to be free from violence must be discussed in this report to adequately address malnutrition.

Beyond the centrality of women's rights, it is important to challenge the gendered analysis present in the gender section (pg. 57-58). Explicit in this section is the notion that the work of feeding and caring is "women's work" and therefore they must be educated and empowered so that they can care better. However, this analysis fails to acknowledge the importance of sharing the burden of care and feeding work across genders and creating the structural conditions necessary for this to happen so that feeding no longer becomes the exclusive domain of women. Furthermore, in this section, women's cultural beliefs are implicitly conceived as the problem causing poor nutrition and thus the solution is conceptualized as education to change these beliefs, however, the structural conditions shaping women's feeding and caring practices are not exposed. Throughout the Gender section links between women's educational attainment and reduced hunger are mentioned but the reasons for this link need to be unpacked: why does women's education lead to reduced hunger? What structural conditions change with educational attainment that could lead to this reduction?

***13. Diverse local/indigenous knowledge systems should be featured as key part of the solution rather than the Zero Draft's strong bias towards technological fixes***

The report fails to acknowledge that innovation, technology and knowledge are not just created through traditional academic and/or laboratory research but rather in real life situations. There is a diversity of indigenous knowledge of land, seeds, agroecological methods, and culinary techniques that are constantly evolving in relation to new experiences. **Thus, in Chapter 4, the solution to achieving nutritious and sustainable diets should not be framed solely by the need to develop new technologies but also the need to protect, promote, respect and disseminate existing indigenous knowledge systems.** Similarly, these knowledge systems which develop and evolve outside of academia must be mentioned in Chapter 2, as drivers of food systems because they inform the production work of many small-scale food producers. A deeper understanding of the traditional/indigenous practices, which contribute to sustainable and healthy diets should be identified as a key area for future research and knowledge building within the report. Apart from technology-driven approaches, holistic approaches to sustainable and healthy diets, based on traditional knowledge and indigenous food systems should be included, such as integrated farming systems, (Klizing et al. 2014) and the contribution of indigenous trees to nutritional health (Kehlenbeck et al. 2013).

In complete tension with the previous point, **the Zero Draft features a strong bias towards science and technology as solutions to healthier diets, thereby failing to recognize and provide options for addressing the root causes of the problem** – which do not lie in lack of nutritious varieties or knowledge on how to produce these. (p. 15). There is a move towards innovative 'nutrition-smart' 'quick fix' solutions (P 96), bio-fortification (Page 75 Box 8), micronutrient fortification, GM and other technologies (Page 92, 93), however, technologies that rely on and are favored by transnational corporations that are likely to fundamentally

change consumption patterns towards processed foods and snacks and not to generate nutritious and sustainable food systems. The report's emphasis on possible technological solutions, including fortification and food processing, reflects the significant funding bias of recent research. These can certainly play a supporting role but have not proven to contribute to sustainability. While we recognize the valuable contribution that technology and innovation can make to nutritional outcomes, there is a need to redress the balance, so that traditional practices and knowledge systems which have evolved over millennia and contribute greatly to food security and nutrition are given much greater attention and afforded the recognition and protection they deserve. Moreover, it is central that the report includes a comprehensive analysis of the risks associated with the different technical approaches outlined (see also specific comment). Approaches to address malnutrition should be assessed in terms of the risks and benefits associated with them, within the broader human rights perspective outlined above.

#### ***14. Failure to juxtapose the paradigms of agro-biodiversity and food fortification***

The Zero Draft fails to articulate a proper discourse that juxtaposes and analyzes the two critical and opposing paradigms: diversified diets based on agro-biodiversity and increasingly homogenous diets largely composed of industrial products based on large scale agriculture of very few crops. Once again, this is easily conducive to the proposed food system typologies that have been earlier proposed. **It is the reduction of biodiversity and nutritional content that is inherently consequent to the industrial system that generate the nutritional deficiencies that are claimed to require food fortification. The industrial system claims to offer food fortification as the solution to a problem it has itself generated and, by doing so, it continues to phagocytize local food systems that rather offer deeply rooted solutions based on agro-biodiversity.**

With respect to biodiversity, the importance of intraspecific diversity is mentioned on p.15 but then never returned to. In chapter 3 (p. 44), there is a mention of humans working with 7000 plant species. That is exactly what the formal industrial agriculture/plant breeding system has produced. But, it has been widely documented that farmers, through peasant agriculture and through developing and keeping their own varieties (which are often outside the 'formal' breeding system, and therefore referred to as 'informal or farmers' varieties'), have bred about a million varieties of crops. This has huge implications for dietary diversity and the potential for human nutrition (not to mention identities and cultures). This is a critical argument for supporting the peasant, biodiverse, agro-ecological approaches to nutrition and should be clearly exposed by the report, particularly though not exclusively when discussing agroecology. This is also directly related to climate change: there is utmost need for all the diversity and nutritional variety of farmer bred crops, and their wild relatives, in order to find the varieties that are not only nutritious, but are able to cope with drastically changed growing conditions.

Within this same discourse, the Zero Draft fails to produce an in-depth analysis of the real determinants of micronutrient malnutrition (Chapter 2.3, p. 35-38) and does not clarify that nutritional deficiencies are rarely focused on single nutrients. Generally, nutrition insecure groups lack far more than Vitamin A and other prominent Micronutrients (iron, iodine, zinc). There have been identified at least 19 micronutrients with direct influence on physical and mental development and the immune system and often operate in association with each other. So far, we just know the clinical symptoms of a few of them, but other micronutrients could

have considerable influence on our nutrition well-being. The fact that hidden hunger is most frequently described by Vitamin A, iron, zinc and iodine deficiencies is due to the fact that they produce a typical clinical picture. However, these prominent micronutrients are to be understood as lead substances for the lack of foods from certain food group (see e.g. Biesalski, Hans Konrad. 2013. Hidden Hunger). The real challenge is to address these complex problems not by reducing them to single nutrients but by a variety of approaches which should be reflected in chapter 4.

Regarding fortification and bio fortification, not only the Zero Draft fails to properly contextualize these methods within the tension between different food systems, as earlier explained. It basically gives them for granted with limited problematization and in-depth analysis. In this respect, the report should unambiguously clarify that balanced and diversified diets supplying adequate nutrients are generally not only the preferred, but also the most effective and efficient long-term way to prevent micronutrient deficiencies for most groups, with few exceptions made such as for pregnant and lactating women, populations with specific needs (e.g. people living with HIV/AIDS or other chronic diseases), and countries where the soil does not contain iodine (e.g. remote countries, far away from the oceans). Furthermore, the report needs to clearly distinguish between food fortification (flour, iodized salt, etc.) and approaches to conduct biofortification (conventional breeding, GMOs, boosting the soil nutrients through fertilization, natural or synthetic), given the difference between the content, process and issues related to these two fields. The report then needs to clarify the differences between crop fortification, agronomic fortification and biofortification, and mention all the concerns and issues related to each of these methods. More specific comments are included in the following section.

#### *15. Case Studies: Issues of inclusion and depth of analysis*

**First of all, there is an issue of inclusion. There should be a better balance of case studies from civil society, including research and experiential knowledge of communities themselves, as explicitly recognized by the CFS Nutrition document.**<sup>1</sup> The case studies should include examples of food systems that provide good nutrition, among other positive social outcomes, and need to be protected/supported by governments, such as indigenous food systems, community-supported agriculture, and food systems based on agro-ecology and small-scale food producers. The section notes that consultations with experts in the field have taken place to collect the case studies. It would be good to clarify with whom, and in particular how far social movements and groups most affected by malnutrition have been consulted. The focus on innovation and technology in this section (and throughout the document) must be challenged. Promoting good nutrition does not necessarily require “innovation” but can be very simple measures, such as the regulation of marketing or support for territorial markets and local small-scale food producers. **The case studies should moreover include initiatives by small-scale food producers, consumers, etc. themselves, indicating measures that States could take to support these.** While there are several case studies on fortification and bio-fortification, there is no single case-study on promoting agroecology, community supported agriculture, access to land (e.g., via agrarian reform), or territorial markets (aside from examples regarding public procurement from local farmers).

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<sup>1</sup> Para 12: HLPE reports, including the forthcoming report on Nutrition and Food Systems, will play a key role by providing independent evidence-based information based on existing high quality research, data, technical studies **and experiential knowledge.**

Public procurement - and in particular school canteens – are indeed key entry points for promoting more healthy and sustainable diets. This is increasingly being done all over the world: Brazil's home-grown school feeding programmes, school canteens in Copenhagen, etc. The role of HORECA (<https://en.wikipedia.org/wiki/Horeca>) is also essential and should be mentioned. The lack of case studies on more holistic policies that address structural causes of malnutrition therefore needs to be addressed.

Furthermore, the case of Chile combining marketing regulation, labelling and taxation should be included as a very comprehensive example for demand side policies for healthy diets, (presented by G. Girardi at the International Symposium on Sustainable Food Systems for Healthy Diets and Improved Nutrition, 1-2 Dec 2016). This is a preferable case study to that of the Australia labelling system and the Quebec marketing regulation that are now described in the case study section of the text. On page 73, the National Food Security Act of India should be included as a box since as it is an attempt at better food provisioning and provides a justiciability framework for grievance redressal in case of the denial of entitlements.

**Secondly, there is lack of in-depth analysis of the case studies.** Purpose of the case studies should be to provide policy guidance to States based on concrete examples. **Instead of having 40 case studies there should be a selection of fewer case studies that provide more in-depth analysis of the factors that contributed to outcomes and limitations of the study.** Currently the case studies are very superficial and do not provide sufficient details to inform policy choices. The case studies should not stand on their own but rather provide illustrative examples to policy options discussed in the report. Hence, the section should provide more detailed analysis of possible policy options to improve nutrition through food systems interventions bringing in some case studies to illustrate these.

#### ***16. Governance, including Conflicts of Interest & Public-Private Partnerships***

The issue of governance is central to the topic of food systems and nutrition. Governance is mentioned in 4.2.3 but the CSM suggests that governance be discussed much earlier in the document, in the food systems drivers' section (3.2), perhaps under the section "political and economic drivers". The topic of governance, and the related topics of i) conflicts of interest, which challenge democratic governance in the public interest, and ii) the failure to protect human rights, and iii) the need for social participation to have effective, participatory and democratic governance should be discussed in section 3.2. These elements of governance are crucial to ensure nutrition.

**Within the discussion on governance and public policies, the topic of conflicts of interest is of central concern to this report and to the CSM because conflicts of interest jeopardize the food system and shape its impacts on nutrition in a variety of ways.** It is essential that the governance of food systems always ensures that food security, food sovereignty and the right to food are primary objectives of the food system not corporate profits. Governance and regulatory measures must ensure that this mandate of ensuring the public's right to food and nutrition is considered above any other economic or commercial interest. Conflicts of interest arise when public interactions with the private sector undermine the primary interest in ensuring nutrition for the population. Conflicts of interest serve to deteriorate the effectiveness, integrity, independence and trustworthiness of public institutions and challenge democratic, evidence-based governance processes. It is essential that conflicts of

interest be ensured against through safeguards and policies such that corporations do not have undue influence on food and nutrition policy.

One way in which conflicts of interest manifest themselves are through public-private interactions. Such interactions take many forms, for example government lobbying by corporate groups/associations; corporate funding of government officials/campaigns/programs; private funding of nutrition or agricultural/food systems research, the involvement of corporations or privately funded organizations and philanthropies in policy-making processes (design, implementation and evaluation); and corporate funding of programs, interventions and educational campaigns to address malnutrition or impact the food system. Voluntary self-regulation is another form of PPP in which the industry enters into agreement with the government to regulate, evaluate and monitor its own practices, these efforts have proven ineffective and serve to delay and inadequately replace statutory regulation. These concerns must be described in this section and recommendations put forth to avoid CoI.

PPPs per definition create financial and/or other economic dependencies of public institutions on private sector actors and will thus by definition create an economic, and a social and institutional, incentive for public institutions to align their policies with the commercial interests of private sector actors. Such an alignment will always compromise the objectivity and independence of public institutions. This must be highlighted in the section. Furthermore, this section should identify the roles of the public and the private partner(s) and address the challenge of conflict of interest (see Jonathan H. Marks. 2014, full reference below).

The PPP section also does not mention human rights risks associated with these partnerships, nor the need for HR impact assessments/ monitoring/ accountability mechanisms, conflict of interest policies and criteria for partnerships (with whom, in what role can participation take place). These issues need to be firmly described in the PPP and conflicts of interest sections.

## II. SPECIFIC COMMENTS ON SECTIONS AND/OR ISSUES

### - Terminology and Definitions:

- A definition is necessary for “nutrition sensitive” as this approach is mentioned in the draft many times;
- There are very serious issues with the definitions of malnutrition and acute malnutrition, and acute malnutrition and wasting are often confused. In addition, the situation of undernutrition is sometimes viewed too positively because of an overall focus on stunting in the report, without taking into account wasting. The description of obesity and overweight must also be more rigorous in terms of indicators used and populations described;
- Most of the research reviewed mentions country data. There are several references to low and middle-income countries. The SDGs and Agenda 2030 have recognized the need to move beyond this simplistic classification;
- The CSM suggests using the term “**sugary beverages**” rather than sugar-sweetened beverages to align with the new WHO report (2016) “Fiscal policies for Diet and Prevention of Noncommunicable Diseases (NCDs)”;

- **Policies to promote breastfeeding:** Breastfeeding and appropriate complementary feeding are mentioned but not acknowledged as an important element of the food system nor is breastfeeding considered in the frame of human rights (UN, 2016). Breastfeeding is an extremely important element in reducing obesity as well as undernutrition. The role of exclusive breastfeeding in improving nutrition and the impact of the availability and marketing of breastmilk substitutes on dietary changes need to be acknowledged in Chapter 3. Food system typology indicators should include breastfeeding indicators. There is little or no emphasis on the importance of translating the International Code of Marketing of Breast-milk Substitutes and Resolutions into statutory legislation, the need to stop harmful marketing and for WHO's clear call to stop corporate sponsorship of health workers. These should be mentioned as key measures to promote to improve food systems. Furthermore, the report should explicitly warn against agreements between the government and industry, which would enable the industry to self-regulate aspects of the Code, as these have been proven ineffective;
- **Processing and food loss:** The statement "Processing and packaging are associated with reduced food loss" (p. 17, line 25/26) should be qualified. Quality standards for processing and packaging which refer to aesthetic criteria may even increase food loss. See the example of how appearance quality standards in supermarkets for fresh products lead to food waste (FAO 2011);
- **Innovation and research drivers** (p.74): To assess who is driving the R&D agenda it is important to present data and trends on public and private sources of investment in R&D. Also, data and trends should be presented for investment in R&D focused on staple crops vs. other crops;
- **FDI and Trade:** Foreign direct investment and its impacts on nutrition and food systems more broadly (e.g., by destroying local markets/ small producers + venders) is not dealt with at all and an overly positive picture of trade presented ("Trade policies that enhance liberalization and globalization should be promoted while the counter-cyclical trade policies and the banning of food exports should be eliminated" p.100). Highly specialised industrial agriculture and export-oriented farming is brought up without any assessment of what this means for FSN. Also in Chapter 3, the impacts of trade on biodiversity are mentioned as being both negative or positive, but evidence shows that international trade is favouring a few agricultural/plant varieties, creating uniformity and therefore adversely affecting biodiversity. The IPES-Food panel demonstrates this in their report 'Uniformity to Diversity' and this logic should be followed (iPES 2016);
- **Power relations in food system:** Power relations within the food system and who controls the food and access thereto are completely left out of the picture. Small-scale farmers and agroindustry are all reduced to "value chain actors" with no consideration to the power relations between them and the impact these have on food security and nutrition. These relationships and power differentials need to be flagged;
- **Independent Evaluation and government-led initiatives:** If this report is to have value it must address the need for truly independent monitoring/research, regular oversight by national authorities - especially of the new technologies. Furthermore, it must warn against voluntary agreements and privately funded initiatives and programs which can be 'here today' gone tomorrow. Governments should be encouraged to establish policies that incorporate good (independently) proven interventions that may not show a return immediately;

- **Social Networks and Movements beyond UN and development cooperation:** In the Social Networks and Movements section (p.50) and the Movements for Nutrition section (p.106) there should be additional mentions of the multiple movements that work to promote health, sustainability and livelihoods across the full spectrum of spaces – from agriculture to sustainable and healthy diets. While the extensive space provided to the CSM and the ICN2/Nutrition CS Group might be appreciated, these often only represent to tip of iceberg when it comes to the variety of forms of producers and citizen’s mobilization. Furthermore, critiques of the SUN movement, in particular due to the influence of the industry in shaping its agenda, should be properly acknowledged (Schuftan 2013);
- **Fiscal Measures:** The term “tax tax” should be avoided, the term fiscal measures or tax on unhealthy foods/beverages could be used instead. In line with the recent publication by WHO (2016) a 20% tax on sugary drinks should be recommended, to ensure that proposed taxes are high enough to be effective in reducing obesity and diabetes cases. The example of Mexico might be more well/suited as an example (p. 101) than Australia since it is already in effect. The suggestion that poorer people’s pockets are hit the most needs to be qualified, these groups are also more likely to suffer from obesity and diabetes (in essence the burden of obesity and NCDs is regressive), and more likely to experience financial turmoil as a result of diabetes treatment costs, thus they have the most to gain from a tax;
- **Link between income and diets requires analysis:** The link between income level, diets and nutrition must be further explored, including in terms of forward-thinking: If changes in economic status lead to both an increase of consumption of healthy food (fruit, seafood, milk) and unhealthy foods (processed meat, sugar-sweetened beverages, red meat, sodium), and to an overall increase of food intake, what does that mean both in terms of nutrition, and in terms of sustainability in a world expected to reach 9 billion inhabitants in 2050? Analysis and policy recommendations must be made to address this;
- **Costs of healthy diets:** The assumption that healthy diets are more expensive (p. 51) needs to be substantiated: the issue is not to compare a mass-produced commodity with the biologically produced equivalent, but to look at the food budget as a whole: cutting down on meat, dairy products, processed foods and soft drinks helps to reallocate household resources to better quality pulses and vegetables. In general, households have never spent such a small portion of their budget on food anyway and this cannot be sustainable;
- **Drivers of food price volatility:** Some of its drivers (biofuels production, financial speculation on agricultural commodity futures) of price volatility are mentioned, but others are not (i.e. link between unrelated physical markets such as oil and corn through biofuels production and financial speculation, lack of global governance of food markets, trade liberalization, low level or absence of food stocks and food reserves);
- **“Input supply” Value Chain:** In figure 27 (Chapter 4.1.2) on the “maximize nutrition exiting the value chain”-side another factor should be added to the “input supply” link in the value chain which is the reduction of diversity of seeds (and animal breeds) due to concentration processes in the agricultural input industry (Wesseler et al. 2015, see full reference below);
- **Chemical Inputs & GHGs:** In the natural resource section the treatment of chemical inputs is weak; the paper suggests that the problem with synthetic inputs is pollution only and, though the contribution of agriculture to global emissions is addressed later, the energy-intensity factor and its contribution to GHGs is avoided in the fertilizer point.

Here, a point should be made on the need for adherence to and coherence with the “Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security”;

- **Diets, health and climate change:** With regard to impacts of diets on health and climate change (p. 48), we recommend to take into account the study Springmann et al. 2016, see full reference below;
- **Urbanization** is mentioned as an important driver of food systems and diet changes, yet there is no mention of how urban and peri-urban agriculture could be part of the solution, nor recommendations for public policies on this topic;
- **Food acceptability and marketing (p.88):** The implementation of marketing regulations to prohibit marketing to children is crucial. In addition, adults in all countries are confronted with contradicting and confusing messages on what a healthy diet is. Country-specific evidence-based dietary guidelines, the promotion of consumers’ right to information as well as policies regulating nutrition declarations/disclaimers and the marketing of ultra-processed food (to all age groups) need to be promoted;
- **Reducing over-consumption of ASF is a win-win-win:** The report should address over-consumption of ASF (animal sourced foods), especially processed ASF, as part of the response to malnutrition from obesity in the HLPE report 12, with ways to address the marketing; subsidies, production; processing; retailing and psychology of over-consuming ASF, particularly processed ASF. A greater focus is deserved on ways to reduce over-consumption in high-consuming populations, and avoid the uptake of high consumption in growth areas. Reducing obesity through reducing the consumption of ASF (processed and non-processed) will bring many benefitsK;
- **Higher welfare farming produces food of higher nutritional value:** Research shows that animal sourced foods (ASF) from higher welfare farms (e.g. free-range/organic with slower growing breeds, space to roam and access to forage) tend to be of higher nutritional value than intensively farmed ASF (Pickett 2012). Data show that the iron content was higher in free-range/organic pig-meat, chicken and trout than intensively farmed counterparts. Similar results were found for levels of carotenoids and vitamin E, in beef, pig-meat, chicken, milk and eggs. Also, the proportion of Omega-3 to Omega-6 was consistently better in free-range/organic/slower-growing lamb, beef, pigs, chickens, trout, milk and eggs from higher welfare farm systems than industrial farm systems. Other nutrients have not been examined yet;
- **Nutrition-smart accessibility:** The section on Nutrition-smart accessibility through technology (p. 96) should also address the risks, e.g. in terms of privacy loss, with which it is associated;
- **Food fortification:** In addition to the profound critique exposed within the overarching comments, there is a need to detail the issues and concerns that still exist around fortification (once clearly politically located with the discourse of the report), and clarify the context of its use:
  - o Does the report consider fortification as a temporary solution, in this case appropriate for what situations? Fortification and supplementation do not address the root causes of malnutrition. Therefore, the need to invest in healthy and sustainable food systems based on human rights should be stressed within this report;

- The report should fully expose the challenges related to technological issues, such as appropriate levels of nutrients, stability, bioavailability, nutrient interactions, physical properties, and describe and analyze the risk that foods fortified with micronutrients may not fully meet the needs of certain nutritionally vulnerable subgroups such as pregnant and lactating women, or young children. For example, infants and young children, who consume relatively small amounts of staple foods are less likely to be able to obtain the recommended intakes of all micronutrients from universally fortified staples or condiments alone;
- The report, rather than simply addressing the claimed benefits as in the current section, should address the risks of fortification, e.g. with regard to overweight and obesity. Fortified cookies, for example, can even contribute to worsen diets as these cookies might be promoted and considered as healthy while containing high amounts of fat and sugar. The US example on fortification of foods with folic acid might help preventing severe problems for unborn babies, but it might also cause problems for other people within the population as it might mask a deficit of vitamin B12. The unspecified fortification of foods does pose risks, while a target group oriented supplementation of certain minerals and vitamins is often possible. These aspects need to be discussed in the report;
- **Crop fortification/biofortification:** The section should explicitly address the risks related to biofortification, among them the reduction of agrobiodiversity and, as a consequence, dietary diversity due to the promotion of biofortified staple crops replacing other micronutrient-dense crops such as pulses, vegetables and fruits. The additional risks and trends associated with genetic modification need to be addressed, among them ecological effects due to pesticide and herbicide resistances; corporate control of agricultural inputs and unpredictable health risks. The report's recommendation to put more attention on food-based solutions could include the promotion of biofortification based on traditional breeding practices, at the exclusion of GMOs and soil fertilizations with large quantities of synthetic fertilizers, and with a particular emphasis on the analysis and promotion of existing vitamin A-rich traditional crops and varieties. Furthermore:
  - Box 8 and 9 (including Africa orphan-crops) are very much in favour of biofortification and need to be counterbalanced with examples explaining the risks and doubts related to biofortification, including the issue of quality and safety of biofortified food;
  - Risks and concerns linked with biofortification must be more detailed: "However, promising as it is, biofortification presents some limitations (Bouis and Yassir, 2011). Much more evidence still needs to be provided before the efficiency and effectiveness of biofortified crops in reducing micronutrient deficiency are proven (Allen et al., 2011; Ceccarelli, 2014). Biofortified crops must be acceptable by consumers in target regions where people are afflicted with micronutrient deficiencies (Bouis and Ross, 2010). It is important to ascertain to what extent the modified nutrient is bioavailable and remains stable with time, processing, and storage (FAO/WHO, 2010). Moreover, not all of the micronutrients in plant are bioavailable to humans who eat these foods (Bouis and Ross, 2010)";
  - The report should analyze the concern that biofortification is usually developed with international laboratories, with poor involvement of national research centres, and its role in fostering further economic concentration of the productive systems.

### III. SUGGESTED READINGS

#### Food Systems & Agroecology

- Foresight, Food systems and diets: facing the challenges of the 21st Century, <http://www.glopan.org/foresight-project>.
- iPES. From Uniformity to Diversity: A paradigm shift from industrial agriculture to diversified agroecological systems, [http://www.ipes-food.org/images/Reports/UniformityToDiversity\\_FullReport.pdf](http://www.ipes-food.org/images/Reports/UniformityToDiversity_FullReport.pdf).
- iPES. Food and the new science of sustainable food systems: Who shapes food systems, and who has a say in how they are reformed?, [http://www.ipes-food.org/images/Reports/IPES\\_report01\\_1505\\_web\\_br\\_pages.pdf](http://www.ipes-food.org/images/Reports/IPES_report01_1505_web_br_pages.pdf).
- De Schutter, Agroecology and the Right to Food, UNHRC. [http://www.srfood.org/images/stories/pdf/officialreports/20110308\\_a-hrc-16-49\\_agroecology\\_en.pdf](http://www.srfood.org/images/stories/pdf/officialreports/20110308_a-hrc-16-49_agroecology_en.pdf).
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- Pat Mooney and ETC Group. 2015: The changing agribusiness climate: Corporate concentration, agricultural inputs, innovation and climate change, in: Canadian Food Studies/RCEA – Special Issue Vol. 2, No. 2, pp. 117–125.
- UNCTAD. Wake up before it is too late: Make agriculture truly sustainable now for food security in a changing climate, [http://unctad.org/en/PublicationsLibrary/ditcted2012d3\\_en.pdf](http://unctad.org/en/PublicationsLibrary/ditcted2012d3_en.pdf).
- Justus Wesseler, Alessandro Bonanno, Dušan Drabik, Valentina C. Matera, Luca Malaguti, Marcel Meyer, and Thomas J. Venus. 2015: Overview of the agricultural input sector in the EU. [http://www.europarl.europa.eu/RegData/etudes/STUD/2015/563385/IPOL\\_STU%282015%29563385\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/STUD/2015/563385/IPOL_STU%282015%29563385_EN.pdf); Pat Mooney and ETC Group. 2015: The changing agribusiness climate: Corporate concentration, agricultural inputs, innovation and climate change, in: Canadian Food Studies/RCEA – Special Issue Vol. 2, No. 2, pp. 117–125.

#### Global Industrial Food System

- KD Brownell & KE Warner. The Perils of Ignoring History: Big Tobacco Played Dirty and Millions Died. How Similar is Big Food?, *The Milbank Quarterly*, 2009, 87(1): 259-294.
- Center for Science in the Public Interest. Carbonating the World: The Marketing and Health Impact on Sugar Drinks in Low- and middle/income countries, 2016.

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### **Food fortification**

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- Burchi, F., Fanzo J, Frison E, 2011. *The role of food and nutrition system approaches in tackling hidden hunger.*
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### **Biofortification**

- Bouis, H.E., Welch, R. M., 2010. *Biofortification— A Sustainable Agricultural Strategy for Reducing Micronutrient Malnutrition in the Global South*
- Bouis, H.E., Islam, Y., 2011. *Biofortification: Leveraging Agriculture to Reduce Hidden Hunger*
- Allen, L., de Benoist, Dary, B.O., Hurrell, R., 2011. *Guidelines on food fortification with micronutrients*
- Bouis, H.E., 2015. *Improving Nutrition through Agriculture: Cost-Effectiveness of Biofortification*
- FAO/WHO, 2000. *Safety aspects of genetically modified foods of plant origin. Report of a Joint FAO/WHO Expert Consultation on Foods Derived from Biotechnology, WHO Headquarters, Geneva, Switzerland, 29 May to 2 June 2000. Geneva, World Health Organization, 2000*
- Ceccarelli, S., 2014; *GM Crops, Organic Agriculture and Breeding for Sustainability*

### **Breastfeeding & Complementary Feeding**

- OHCHR. *Joint statement by the UN Special Rapporteurs on the Right to Food, Right to Health, the Working Group on Discrimination against Women in law and in practice, and the Committee on the Rights of the Child in support of increased efforts to promote, support and protect breast-feeding*, 2016.  
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<http://www.ucsusa.org/center-science-and-democracy/fighting-misinformation/hooked-for-life-weak-policies-added-sugar#.WE1u7RRfOE4>

### **Climate Change**

- H. Charles J. Godfray, Mike Rayner, and Peter Scarborough (University of Oxford): *Analysis and valuation of the health and climate change cobenefits of dietary change*, 2016.

## **Conflicts of Interest & PPPs**

- Jonathan H. Marks. 2014. Toward a Systemic Ethics of Public-Private Partnerships related to food and health. In. Kennedy Institute of Ethics Journal Vol. 24, No. 3, 267-299.
- Judith Richter: Conflicts of Interest and Policy Implementation: Reflections from the Fields of health and infant feeding.
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- Peters, A. & L. Handschin eds. (2012). Conflicts of interest in global, public and corporate governance. Cambridge & New York, Cambridge University Press
- On corporate influence and PPPs the Global Policy Forum has published several reports recently that can be found here: <https://www.globalpolicy.org/corporate-influence.html>
- Lesser et al. Relationship between funding source and conclusion among nutrition-related scientific articles. PLOS Med 2007; 4(e5).
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## **Gender**

- De Schutter, Gender and the Right to Food, UNHRC.  
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## **Holistic Approaches Based on Traditional Knowledge**

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[http://www.welthungerhilfe.de/fileadmin/user\\_upload/Themen/POWA/Agriculture-Best-Practice\\_Welthungerhilfe\\_Burkina-Faso\\_Ethiopia\\_India\\_Europe\\_01.pdf](http://www.welthungerhilfe.de/fileadmin/user_upload/Themen/POWA/Agriculture-Best-Practice_Welthungerhilfe_Burkina-Faso_Ethiopia_India_Europe_01.pdf)
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## **Sociocultural Drivers of Malnutrition**

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- Mintz, Sweetness and Power, Penguin: New York, 1985.

## **SUN (Scaling Up Nutrition)**

- C. Schuftan & Ted Greiner. The Scaling Up Nutrition (SUN) Initiative, 2013.

## Ultra-processed foods & marketing, taxation and front of labelling regulations

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