This document conveys the collective input of the Civil Society Mechanism of the CFS regarding the e-consultation on the Issue Note proposed by the HLPE Steering Committee with respect to the upcoming HLPE Report on Food Systems and Nutrition. The document is based on the ongoing work of the CSM Nutrition Working Group.

Preamble

The CSM welcomes the initiation of the preparatory process for the HLPE Report on “Food Systems and Nutrition” as it will be the cornerstone of CFS’s engagement with nutrition.

The past years have witnessed a growing disconnect between food and nutrition, as counterintuitive as this may be. While the imperatives of nutritional emergencies may have contributed to this situation, fact remains that nutrition policy, where existing, has been characterized by significant fragmentation, excessive “technicalization” and, often, overwhelming “medicalization”. Most recently, the scientific debate and the policy discourse shifted towards malnutrition in all its forms (this also being the key focus of the ICN2 framework), though significant asynchrony persists between such a narrative and the reality of most nutrition programmes, particularly at the level of international development cooperation.

On the contrary, understanding the challenge of malnutrition in all its forms requires a holistic and multidisciplinary analysis, one that combines political, socio-cultural and technical perspectives. Above all, it also requires full appreciation for diversity and the values of human dignity, equity, sustainability and sovereignty, while recognizing the need for urgency and justice. The first fundamental step is the firm re-connection of nutrition with food, with the understanding that food is the expression of values, cultures, social relations and people’s self-determination, and that the act of feeding oneself and others embodies our sovereignty, ownership and empowerment. When breastfeeding, nourishing oneself and eating with one’s family, friends, and community, we reaffirm our cultural identities, our ownership over our life course and our human dignity.

The CSM therefore expects that such a holistic understanding of food and nutrition will provide inspiration and guidance to the HLPE Report. Should this happen, the Report will greatly contribute to a new phase of nutrition research and policy that can address past fragmentation and re-build a new comprehensive narrative and practise on this critical dimension of human life.

Substantive considerations

1. **Contextualization of the Report within the CFS**: The Report on Food Systems and Nutrition should be a foundational report for the CFS work in Nutrition. It should provide a solid conceptual framework for CFS work in nutrition and propose a common language that all CFS constituencies could refer to in future work. This would also include the harmonisation of current terminology used within the food and health angles of nutrition. At the same time, the report needs to be contextualized within the CFS, both in terms of its clear rights-based approach (with special but non-exclusive reference to the Right to Adequate Food and Nutrition,
the Right to Water, the Right to Health, Women’s Rights, and Workers’ Rights) and its solid roots in the Global Strategic Framework and CFS’s past policy products and recommendations;

2. **Holistic and rights-based understanding of nutrition**: The report should start with a holistic understanding of nutrition grounded in a solid multidisciplinary approach, recognising that the fragmentation of nutrition is, largely, the result of a fragmented and reductionist conceptual framework of agriculture, food and nutrition knowledge as well as of significant vested interests. Human beings do not feed on Iron, Calcium or Trans Fats, to mention just a few: They need a varied and healthy diet. However, larger socio-economic and political considerations influence whether babies are breastfed or are bottle-fed, and whether adults eat meals that may or may not be diversified, healthy, safe, culturally appropriate and nutritionally adequate. The Report should therefore resist the temptation to limit its considerations to any artificial subset of nutrition issues, which may be identified to be more closely connected to food systems. For instance, a superficial analysis could suggest that breastfeeding may not be squarely related to food systems and should therefore only be marginally addressed by the report. On the contrary, it is impossible to disconnect the relation between food systems and nutrition, on one hand, from the fulfilment of women’s and workers’ rights and all the other factors that promote or hinder the enabling conditions for optimal breastfeeding and caring practices, on the other. Taking such a holistic approach on nutrition would therefore involve bridging and integrating the conceptual and normative framework of the right to adequate food and nutrition with the right to health and all other related rights, particularly women’s rights, right to education, child rights, peasants’ rights and workers’ rights. The full realization of the right to adequate food and nutrition, in the context of the indivisibility of rights goes well beyond the replenishment of energy and nutrients. It results in numerous capabilities, which allow human beings – babies and adults alike – to protect themselves against diseases, be active, learn, develop, participate in social life, create, love, produce, and progress toward their full human potential.

At the same time, such a holistic approach should not lead to superficiality. For instance, understanding the relationship between agriculture, diet, nutrition and the growth and development of children, while intuitive, has proved to be complicated as the quality, in terms of nutrient content, of the diet is affected by crop varieties, soil fertility, water availability, processing and cooking techniques, as well as broader economic, social and political determinants. It is therefore essential that the holistic framework percolates down in the depth of the issues rather than remaining an umbrella with no sequel through the Report;

3. **Central public policy focus on promoting balanced, diversified, healthy and sustainable diets**: The Report should expose the key drivers of dietary patterns, taking into consideration both demand and supply side factors. However, rather than considering these drivers as given dynamics, the Report should emphasize the role of public policy in promoting diversified, balanced, sustainable and healthy diets, seeking the convergence among the food, health and environmental policy dimensions of nutrition. People eat a different ratio of food products from the 3 newly defined food groups\(^1\), certainly due to their eating habits or wishes, but being heavily influenced by public policies which influence purchasing power, relative price, accessibility and

\(^{1}\) Three main groups are defined: unprocessed or minimally processed foods (group 1), processed culinary and food industry ingredients (group 2), and ultra-processed food products (group 3).
marketing, with different implications for their nutrition and health. In particular, the Report should expose the role of supply side factors, including the impact of commercial operators and related organisations, in creating demand and shaping the direction of dietary changes. These should include: the massive marketing of breastmilk substitutes, industrial products and animal-based foods; the enormous advertising influence of large food corporations and the social-appeal/status of certain foods that they generate; the misleading food labelling practises; the provisioning and advertising of unhealthy food in institutional settings (especially schools); and, the often close relationships between agribusiness and governments, which translate into unfair subsidies, pricing and trading terms that favour the corporatized food system and generate artificially-low prices of industrial products. The Report should also give voice to emerging consumer movements that claim their rights to healthy, affordable, locally-sourced and accessible food options as well as to transparent information, and to be protected (particularly children) from aggressive marketing of breastmilk substitutes, unhealthy food and beverages that promote the increased incidence of diabetes, cardio-vascular diseases, some types of cancer and other diet-related non-communicable diseases. The way in which food systems are defined by communities themselves should also be given prominence. For example, traditional indigenous foods including gathered and wild foods make vital nutritional contributions to diets. Lastly, the promotion of sustainable food systems in institutional settings, especially schools, should be given special consideration, especially due to the importance of child and adolescent nutrition to prevent obesity and diet-related chronic disease in childhood and through the life course;

4. **It is essential for the report to properly articulate the diversity and interplay of food systems:** The Report should expose how different food systems shape significantly different nutritional outcomes and condition the emergence of different dietary patterns, with profound consequences in terms of the prevalence and incidence of diet-related non-communicable diseases. However, these different food systems cannot be seen in isolation one from the other and their interlinkages and power imbalances need to be addressed. In this context, the Report should not characterize the relation between different food systems as one of peaceful cohabitation and should rather expose the homogenizing, hegemonic and often predatory nature of the global industrial and corporatized food system and how it affects the viability of other food systems;

5. **Centrality of the role of smallholders as the main contributors to food security and nutrition:** The Report should clearly recognize the far-too-often neglected reality that family farmers, especially small-scale farmers and food producers, feed 70 percent of the world population and are the main investors in agriculture. It should also reaffirm the importance of territorial, internal and informal markets, as these are the dominant source of food consumed in the world, particularly in the Global South. Any dynamics that influence smallholders’ rights, resources and

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3 These close relationship often translates into policies that speed industrialization of agriculture and livestock, including subsidies, tax incentives, limited or non-existent regulatory regimes, trade arrangements, public procurement, and few or no mechanisms to cost the enormous externalities of industrial production, or to recover these costs.
capacities and undermine territorial, internal and informal markets have profound consequences on the evolution of food systems and their nutritional outcomes. In this respect, the Report should expose that, in the name of the grand narrative of feeding the planet, agricultural intensification and specialization are triggering the exit and exodus of millions of peasants, pastoralists and indigenous people, the disappearance of traditional crops and breeds, and creating enabling legal conditions for the further grabbing of land and water resources from their legitimate communities. The Report should also expose the often-violent displacement of communities and appropriation of their lands for the industrial agriculture and livestock industries, and the resultant loss of more sustainable livelihoods, with profound consequence on nutritional outcomes for these communities and the larger population. Furthermore, it should document the rise of oligopolies and extreme market concentration of inputs and the rapid, continued and unchallenged global consolidation of the industrial complex. Indeed, the continued expansion of the agro-industrial complex is undermining smallholders and their capacity to sustain their productive, territorial, social and political functions. It is itself generating the problem it claims to address;

6. **The Report should factor in the impact of climate change and highlight the implications of dietary patterns on environmental sustainability:** While agro-biodiversity is an important contributor to dietary diversity, changes in the length and nature of the growing season, increased variability in local weather patterns, including the increased incidence of extreme climate events, and other changes to agro-climatic factors may reduce the range of crops that can be grown. The consequences of climate change for undernutrition could be potentially devastating and significant efforts are required to strengthen mitigation and promote crop diversification and resilient adaptation strategies. While the Report should expose these important dynamics, it should also highlight the sustainability dimension of diets and the urgent need to significantly change the ecological footprint of agricultural production. In this context, agroecology should be recognized as the most effective pathway towards resilient, agro-biodiverse, and ecologically sound local food systems promoting and supporting diversified, healthy and sustainable diets;

7. **Locate the relation of food systems and nutrition in the broader context of the social, economic and political determinants of malnutrition in all its forms:** The centrality of human rights and the need for a holistic view of nutrition demand that the key focus of CFS policy concerns should be that of addressing the structural determinants of malnutrition in all its forms, rather than focusing on nutrition as a need to be delivered (obviously without ignoring or underestimating the urgency of nutrition and food emergencies). The focus on food systems should not therefore fail to recognize that the root causes and factors leading to malnutrition in all its forms are many, complex and multidimensional and cannot be separated from their broader social, political and economic context. It is therefore necessary for the Report to adopt a conceptual framework that is broad enough to explore how these determinants influence health and well-being rather than an individual-based framework, which focuses solely on education and/or technical and technological solutions to change production and consumption behaviours;

8. **The full realization of women’s human rights:** Widespread violations of women’s and girls’ rights, women’s lack of control of economic resources, lack of focus on adolescent girls’ nutrition
and reproductive health are some of the most pervasive determinants of malnutrition in all its forms. Despite some advances, most women in the world today continue to be subject to several layers of structural discrimination and violence, at societal, community and household levels. Not only does this have negative implications for the full enjoyment of their human potential, but it also contributes to rendering women and their rights invisible in food security and nutrition policies, leads to programmes that tend to overburden women even more with additional responsibilities, and promotes the intergenerational reproduction of malnutrition. The full realization of women’s human rights, in equal footing with men, is therefore central to the pursuit of the right to adequate food and nutrition and the right to health and needs to be a central consideration of the Report. The prevention of femicide, the full access to education (not limited to enrolment but ensuring completion), equal pay for equal job, the provision of paid maternity benefits, the social recognition of unpaid work through social and community support mechanisms, the gendered redistribution of household tasks, the prevention of child, early and forced marriages, and the protection of women and girls against all forms of violence are all critical components of an effective strategy for tackling malnutrition in all its forms. Equally importantly, breastfeeding must be protected, promoted and supported, as the best alternative for mothers to feed their babies, and women must have all legal, public, community and family support that is required. All these dimensions closely interconnect with food systems and nutrition, and need to be addressed by the Report.

In conclusion, the CSM is confident that the HLPE Report will contribute to moving from food-product approaches to food systems that support diversified, balanced, sustainable and healthy diets. The ultimate consequence of all points above is the centrality of breastfeeding and diversified, balanced, sustainable and healthy diets versus industrial food products and other product-based solutions that address specific deficiencies or forms of malnutrition. Such diets must be protected, promoted and supported by sustainable, local and regional food systems, firmly centred on small-scale sustainable food producers, protected against unfair competition, and aggressive marketing, and aligned with agro-ecological and food sovereignty principles. It is also essential to recognize the value of indigenous food systems and the critical role of locally sourced and collected foods, e.g. wild foods, and, more broadly, acknowledge the importance of recognising how communities and individuals define their food items.

This approach inextricably links healthy nutrition to agricultural biodiversity, which is a direct function of the genetic diversity maintained by small farmers, fishers, indigenous peoples and food producers, through their existing and diverse knowledge systems. These food and knowledge systems should be protected, promoted and supported by health, agricultural and other policies, rather than undermined by nutritional research and approaches that do not take them into account. Agroecology and food sovereignty therefore offer an alternative vision of food systems that provides for a concrete and viable path to diversified, balanced, sustainable and healthy diets.

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4 It remains understood that product-based solutions may be important in nutritional emergencies and disaster relief conditions, provided these do not become opportunities to dump massive amounts of products that distort local systems, production and responses. This is especially the case as the concept of what represents an emergency is often ill defined.
Methodological considerations

1. It is important to underscore that experiential, rather than just scientific or technical knowledge, be considered in the elaboration of this report. To achieve a holistic understanding of food systems and nutrition all types of knowledge must be drawn on, not just quantitative research and “big data”, but also ethnographies and individual testimonies. The distillation of knowledge into the Report should be an inclusive process in which all actors, especially rights-holders, should have the possibility to contribute their own knowledge and experiences. This might bring about methodological challenges, but it will ultimately result in better quality conclusions, as these will reflect the realities of people, local communities and their struggles;

2. Members of the HLPE team should be sensitive to the fact that academic research, especially in the nutrition and agricultural sciences, is often compromised by economic interests and industry financing. The HLPE should therefore make explicit effort to ensure the research products the Report will refer to have been carried out free of conflicts of interest, because the funding of science by industry has been shown to significantly influence results. For example, a meta-analysis found that studies conducted free of conflicts of interest were five times more likely to demonstrate a link between sugar-sweetened beverages and weight gain and/or obesity than industry-funded studies⁵;

3. Along similar lines, it is essential that the HLPE Project Team be selected with the highest standards of integrity and independence from any vested interests. Ensuring robust safeguards against conflicts of interest is critical to ensure the independence, legitimacy, trustworthiness and credibility of HLPE products.

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