

**OEWG on Voluntary Guidelines for Nutrition and Food Systems  
PSM Intervention, 8 March 2019**

Thank you, Madam Chair.

We would like to thank the TTT and the CFS secretariat for their work and providing us with this starting point.

We do feel nevertheless that several key recommendations from the HLPE report which could be critical to operationalizing the ICN2 framework have not found prominent space in the current zero draft namely capacity building, need of evidence based data and evaluation, partnerships and building on existing instruments.

Let me elaborate on each of these points:

Achieving coherent, integrated policies that work across sectors to support enhanced food systems and diverse consumption requires emphasis on institutional and human capacity building. Strong institutions and well-formulated guidelines are necessary for effective implementation at local, national, and regional levels. In line with HLPE recommendations #1, we recommend capacity building be included in the draft.

The need for evidence-based data has not found a place in the zero draft, despite it being one of the major recommendations in the HLPE report. As we heard during the Jan 30th meeting, we still know very little about diets that people are eating. We need quantitative data that supports decision-making, without substantiated data, the accuracy of decision-making suffers. In addition these will support follow-up and review mechanism for monitoring and evaluation of the policies and recommendation put in place.

Reference to partnership, in line with SDG 17, is missing in the draft – in fact, the word “partnership” is never mentioned in the zero draft at all. We urgently need to commit to proactive engagement with all the actors who put food on our tables.

Finally, as per points 8, 29, 30, PSM welcomes that the zero draft will be built on existing instruments, as noted in point 7. The PSM also would like to note that the policy guidelines need to focus in areas where CFS has the expertise and rely on complementary UN groups and instruments like Codex to not duplicate efforts. By drawing upon existing

knowledge, we will ensure against taking on overly ambitious work that may not be practical given limited resources and time.

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In addition to our previous statement, PSM would like to recommend further enhancements to the structure and content of the zero draft as follows;

We feel that some of the elements should be crosscutting, such as food safety which is only referenced in subpoint 4(a), as well as food loss and waste which is not mentioned.

Something else that should be considered is technology development and adoption. These guidelines should promote and foster the development of innovative technology to support food system transformation in particular technologies that support sustainable food production, improve food safety and infrastructure.

Lastly we note that Rates of overweight and obesity are indeed growing worldwide; however, with 88% of countries facing a double burden of over and under-nutrition, we fear that the Zero Draft is not adequately addressing these twin challenges, as well as the complicated interplay between the two. In the current version the voluntary guidelines with its policy recommendations is highly focused on one type of malnutrition. Broader spectrum will need be to considered if we do not want to risk that the nutritional needs of many groups vulnerable to the different types of malnutrition to drop from the policy agenda. Therefore we feel that , the equity focus on the three pillars of sustainability – Social, Economic and Environment in the guidelines should come through more strongly. There is no meaningful discussion on the affordability of such healthy diets as defined in the draft or the extent to which the proposed diet can be implemented in a manner to ease huge inequities in access to nutritious food. For example, a recent analysis of data from Bangladesh, Malawi, Brazil and Zimbabwe found that it would cost approximately 52% of per capita household income to purchase the recommended fruit and vegetable for all household members.

Change in the food production system will inevitably shift employment across the supply chain from farmers to manufacturers and distributors. Issues of livelihoods are not addressed enough in the current draft.