

29th Session of the Committee on Agriculture

Written correspondence procedure – inputs from Members – original language

Item 2.8 – FAO’s Work in Nutrition

Member name	Comments
<p><b>Argentina</b> Tuesday, 10 September, 10:10AM</p>	<p>La Argentina agradece a la Dra. Lynnette Neufel la elaboración y circulación del documento COAG/2024/13. Asimismo, reconocemos los esfuerzos realizados por FAO para promover el consumo de alimentos sanos e inocuos a través de diversas iniciativas, incluyendo los trabajos en el marco de la Comisión de Estadísticas de las Naciones Unidas. Igualmente, sobre la propuesta del párrafo 8, inciso “a”, nos gustaría contar con mayor información sobre la iniciativa de FAO para medir y monitorear las dietas saludables. Al respecto, nos gustaría reiterar que no existe un único patrón dietario saludable, ya que los hábitos de consumo dependen de factores culturales y de las condiciones específicas de cada país que, por ejemplo, se materializan en guías para dietas nacionales. En tal sentido, en principio, entendemos que sería dificultoso poder establecer indicadores que abarquen todos los matices nacionales en materia de conformación de dietas y hábitos alimentarios. Adicionalmente, con respecto a la inclusión del concepto “prevalencia de la diversidad alimentaria mínima” como indicador suplementario del ODS 2, nos gustaría contar con mayor información y enfatizar la necesidad de que, en caso que existiera consenso sobre esta propuesta, la misma debería ser discutida y aprobada por los Miembros antes de proceder a su implementación. Finalmente, con relación a la iniciativa descrita en el párrafo 10, inciso “c”, nos gustaría contar con mayor claridad sobre el alcance del trabajo que desarrolla el Organismo para evaluar científicamente las alternativas a las ASF, así como las implicancias que encierra el hecho que la FAO busque adoptar una posición sobre esta temática independientemente de las visiones de sus Miembros.</p>
<p><b>New Zealand</b> Friday, 20 September 11:51AM</p>	<p>New Zealand appreciates the update on nutrition work at FAO and commends the FAO for the significant progress in nutrition related work.</p> <p>We are particularly interested in some of the regional and country level activities, noting that the Southwest Pacific suffers from both lack of adequate data for the Pacific SIDS as well as a significant burden of diet related diseases, both over nutrition and undernutrition. Access to and consumption of a healthy diet has been raised by many Pacific Members as their countries struggle with the impact of non-communicable diseases related to poor diets. We appreciate the high-level overview of the nutrition work but would like to know if there is a focus of activities on the Pacific SIDS at both a level of data collection as well as proposed activities to support healthy eating in the Pacific.</p>

	<p>Regarding <i>accelerating policies and actions with impact across the agrifood systems to enable healthy diets for all</i>, New Zealand notes the importance of availability of food and open supply chains and the importance of free and fair trade to support food security, accessibility to healthy foods and to support diversity of food supplies. We note there is minimal reference to trade in the update but see trade as a critical consideration in supporting food security, accessibility to healthy foods and ensuring diversity of food supplies.</p> <p>We would appreciate an update on the joint work of FAO and WHO on the joint statement of the core principles of a healthy diet. The term “healthy diet” is commonly used and misused and some form of commonly understood principles would be greatly welcomed. Is there a proposed timeline for completion and can an update on what that statement is likely to cover be shared?</p> <p>We also note the important role of nutrition in the roadmap to address climate change and achieve SDG2. New Zealand would appreciate an update on this including what that looks like in phase II of the roadmap that takes a more regional focus.</p> <p>We look forward to the full suite of documents to support the <i>Global Assessment of the contribution of livestock to food security, sustainable agrifood systems, improved nutrition and the consumption of healthy diets</i> and appreciate any update on their completion dates.</p>
<p><b>Switzerland</b> Friday, 20 September 12:58PM</p>	<ul style="list-style-type: none"> <li>• Switzerland welcomes FAO’s continuous engagement in nutrition and would like to comment on three initiatives in particular.</li> <li>• First, Switzerland is supportive of FAO’s close work with WHO to reach a consensus on the core principles to define healthy diets. Unhealthy diets and diet-related non-communicable diseases are one of the world’s most serious but least-addressed challenges, impacting tremendously human and planetary health and undermining economies in all countries. On that same topic, Switzerland invites the joint FAO-WHO-UNICEF “Healthy Diets Monitoring Initiative (HDMI)” to engage as broadly as possible with Member States, academia and NGOs to ensure that the agreed definition and related tools to monitor and analyze are not only scientifically robust and validated, but also easy to transform into policy and action at national level for minimal cost and efforts. Switzerland also recognizes the work by the FAO, the World Bank and other partners to define and monitor the cost and affordability of a healthy diet and invites the FAO to suggest policy recommendations to repurpose agricultural policies to increase availability and reduce prices of nutritious foods.</li> <li>• Second, Switzerland takes this opportunity to thank the FAO and the other UN agencies which have supported Switzerland and other three UN Member States to submit a proposal to include the prevalence of minimum dietary diversity among women and children as a future Sustainable Development Goal (SDG) 2 in the context</li> </ul>

of the 2025 Comprehensive Review of SDG indicators. Switzerland is fully engaged in the next steps of this process and expects a positive outcome.

- Third, regarding the “Initiative on Climate Action and Nutrition”, Switzerland invites FAO to further analyze the impact of climate change on food-nutrient composition and nutrient bioavailability in the global food supply as well as the effects on food safety, from production to post-harvest protection and to suggest policy recommendations to mitigate these impacts.
- In addition, Switzerland would like to highlight the following points in response to the guidance sought.
- Switzerland encourages FAO to strengthen collaborations with other actors that provide technical assistance and capacity building to countries with the aim to increase national capacities on nutrition-related work, including other UN agencies and in particular WFP, WHO and UNICEF, academia and research institutions including the CGIAR, as well as organizations such as the Global Alliance for Improved Nutrition (GAIN).
- In terms of opportunities to advance the nutrition agenda that can be supported by FAO, Switzerland suggests:
  - Investing adequate resources and build capacity to monitor and diagnose the nutrition situation to inform decision-making and implementation of targeted policies and programmes in agriculture within a food systems approach.
  - Disseminating information and implement training on food safety and its multiple links to nutrition as, for example, highly nutritious foods like meat, poultry, fish and fresh fruits and vegetables are more vulnerable to foodborne hazards.
  - Including more proactively nutrition in the national policies, strategies and action plans in relation to food systems transformation, climate change and biodiversity.
  - Increasing research and investment to foster more nutrition-sensitive agriculture value chains for domestic or regional markets, for example by supporting the production of nutritious and climate sensitive indigenous and traditional crops.
  - Supporting the development of territorial markets along the rural-urban continuum by engaging with cities since more than 70% of all food produced in consumed in urban areas where, for example, healthy foods are typically more expensive than foods high in sugar, salt and fat.
  - Strengthening the environmental sustainability dimension in food-based dietary guidelines.
  - Promoting healthy and sustainable nutrition through public services such as public procurement, training of extension officers, nutrition education and consumer awareness campaigns.
  - Applying the policy recommendations from the Committee on World Food Security (CFS), for example the Voluntary Guidelines on Food Systems and Nutrition or on the Right to Food, for example ensuring that malnutrition assessments at local level include a right to food analysis or that priorities are set on interventions that address the root causes of malnutrition.

	<ul style="list-style-type: none"> <li>• 2025 will be an important year to potentially extend or renew commitments and targets for nutrition as both the UN Decade of Action on Nutrition and the Global nutrition targets end next year. Important gatherings that are already planned should be used to hold the suggested dialogues, either as side events or back-to-back, for example at the Nutrition for Growth conference, the World Health Assembly, the UN Food Systems Summit+4 STM and in collaboration with multi-stakeholder initiatives such as the One Planet Network’s Sustainable Food Systems Programme (and its working group on “Supporting the implementation of National Pathways”, which is being co-led by FAO’s Food Systems and Food Safety division).</li> </ul>
<p><b>Australia</b> Friday, 20 September 2:51PM</p>	<p>Australia thanks FAO for their update on implementation of the Vision and Strategy for FAO’s Work in Nutrition and the extensive work that has been undertaken both globally and at a country level, as reported in this paper. We are supportive of the involvement of multilateral institutions to address issues in nutrition, particularly the World Health Organization (WHO), and we are supportive of engagement in national mechanisms and aligning with national priorities to address country-specific nutritional issues.</p> <p>Australia urges FAO to include Pacific Island Countries in their nutrition-related programs where possible, noting their reliance on subsistence agriculture and the high levels of stunting in countries such as PNG, Vanuatu and Timor Leste. We encourage FAO to focus on critical cross cutting development issues across the Organization’s work, particularly climate change and women.</p> <p>Improving nutritional outcomes is an increasingly important issue, particularly in recent years while many developing countries deal with the food security crisis. Australia is responding to growing global food insecurity and malnutrition and delivering for our partners' priorities by:</p> <ul style="list-style-type: none"> <li>- continuing to provide emergency food assistance via our partners;</li> <li>- providing financial and technical assistance to our region to help build long-term food system resilience through climate resilient and nutrition sensitive agriculture;</li> <li>- supporting the development of social protection systems that provide a safety net for those affected by the food price crisis; and</li> <li>- advocating for open, transparent, and predictable agricultural trade in food and fertilisers, and urging countries to avoid the imposition of distortionary trade policies such as export restrictions.</li> </ul>
<p><b>Norway</b> Friday, 20 September</p>	<ul style="list-style-type: none"> <li>- General comments: Norway’s welcomes an integrated nutrition-sensitive policy approach in all relevant development investments; health, agriculture, environment and climate, and education, to improve the nutrition the status, for women and children especially. We value FAOs role in continuing to monitor the</li> </ul>

10:31PM

levels of global food and nutrition insecurity, and to provide regular updates, recommendations, and technical advice to support countries' efforts towards achieving sustainable food systems transformation. FAOs work on developing country capacity to collect and interpret data, and closing the agricultural data gap, is important here. We also emphasize the importance of indigenous peoples' food systems and traditional crops, and FAOs focus on building healthy soils as key areas to strengthen, with importance for nutrition.

- a) Provide general guidance on the needed actions and modalities to further increase capacity on nutrition-related work at country level, with the aim to scale up context-specific policy and technical assistance:
  - FAO should work with other relevant partners (the RBAs, UNICEF, SUN) and in close collaboration with national governments, to apply a cross-sectoral nutrition-sensitive approach.
  - We also see that FAO is providing guidance to assist countries to develop and use food systems-based dietary guidelines, how is this work coordinated with others who may offer the same type of assistance?
  - Developing nutrition sensitive SMEs and transparent markets on local, regional and national level and FAOs nutrition-sensitive value chain approach is also an area we find key to strengthen on country level.
- b) Provide guidance on opportunities and methods to advance the agenda of nutrition for governments in support of accelerating policies and actions with impact across agrifood systems to enable healthy diets for all:
  - The coming six months offer key moments to advance the nutrition agenda, with the Scaling up Nutrition (SUN) Movement's Global Gathering in Kigali, followed by the Nutrition for Growth summit in March 2025.
  - FAO can contribute to cross-sectoral learning and collaboration for nutrition on country level, and to cross-country learning.
  - FAO can focus on building a strong corporate culture for an integrated policy approach to strengthening nutrition throughout the organization.
  - The Right to Food VG 20<sup>th</sup> Anniversary is another moment that offers a political opportunity to focus on nutrition.
- c) Provide guidance on format options that could be considered for the proposed dialogues at the end of the UN Decade of Action on Nutrition (2016-2025) to reflect on the way forward to continue advancing nutrition beyond 2025.

**Brazil**  
Saturday, 21  
September  
12:56AM

Brazil thanks FAO for presenting the report on its work in nutrition, at a national and a global level, and the suggested actions to be taken by the Committee on Agriculture.

Brazil shares the view that promoting food security and nutrition requires initiatives aimed at addressing structural challenges in the production and consumption of appropriate, healthy, and nutritious foods, recognizing the intrinsic connection between health and nutrition.

With regard to the way forward to continue advancing nutrition beyond 2025, Brazil would agree with the assessment that there is still much work to be done and therefore believes it is paramount to determine a path to advance the nutrition agenda in a manner that reinforces the framework of the Decade on Nutrition (2016-2025) and ensures the best alignment possible between it and FAO's Strategic Framework (2022-2031) and Vision and Strategy for Nutrition (2024-2025), as well as with the 2030 Agenda on Sustainable Development and its nutrition targets.

Reference is made below to the document "FAO's Work in Nutrition" (COAG/2024/13), followed by comments from Brazil's Ministry of Health: Paragraph 7. Partnerships and collaborations that can substantially increase investments and actions in support of enabling healthy diets and resilient agrifood systems in multiple contexts, such as:

c) The UN General Assembly resolution 70/25914 proclaimed the UN Decade of Action on Nutrition (Nutrition Decade) for the period 2016-2025 under the normative framework of the Second International Conference on Nutrition to accelerate global efforts and foster cross-sectoral collaboration towards ending all forms of malnutrition. The Nutrition Decade is jointly convened by FAO and the World Health Organization (WHO), and its first action area is on sustainable, resilient food systems for healthy diets. As the end of the Nutrition Decade is approaching, and the UN General Assembly noted the intention of convening open and inclusive informal dialogues towards the end of the Decade, the FAO Programme Committee at its 135th Session in March 2023 encouraged such dialogues for reflection on global progress, challenges encountered and identification of the potential way forward beyond 2025.

Comments:

Considerations on the UN Decade on Nutrition:

The assessments presented by the Rome Declaration, which recognize the challenges that food systems must promote adequate, safe, diverse, and nutritious food, and that improving nutritional status requires healthy, balanced, and diverse diets, reaffirmed in the proclamation of the Decade in 2016, remain relevant. Despite progress made by many countries in recent years, global advancements have been uneven and still modest in

addressing all forms of malnutrition. Moreover, the latest report "The State of Food Security in the World" shows that the world is not on track to achieve SDG 2, highlighting the challenging scenario with indicators such as the prevalence of undernutrition, the cost of healthy diets, and the steady rise in obesity. In this sense, the objective of the Decade? to coordinate global efforts with effective country participation to tackle all forms of malnutrition with a broader perspective, considering that the role of the food system is central to defining the type and quality of food people will consume? remains a challenge that the entire international community must address.

The six "pillars of action" of the Decade (sustainable food systems for healthy diets, aligned health systems providing universal coverage of essential nutrition actions, social protection and nutrition education, trade and investment for improved nutrition, safe and supportive environments for nutrition at all ages, and review, strengthen, and promote nutrition governance and accountability) continue to highlight important areas for policy development to overcome the multiple burdens of malnutrition.

The challenge now is to maintain the gains achieved and deepen the processes that expand physical and financial access to healthy food environments. It is essential that public policies on Food and Nutrition Security (FNS) be formulated in a way that links production and access, with the availability of adequate and healthy food as the key element. This requires that the concept of adequate and healthy food be transversal to the restructuring of food systems, from production to food consumption. Actions must effectively involve States, civil society, and international organizations, which should play an important role in the intersectoral coordination of actions within the UN system and in supporting States.

It is also important to highlight the role of the Action Networks established from the Decade. These coalitions of countries strengthen horizontal cooperation efforts, with exchanges of experiences and the joint construction of solutions. Moreover, by fostering direct multilateral articulation among States, they enhance the implementation conditions of the Decade's recommendations. Brazil leads four action networks under the Decade of Nutrition: the network on Food-Based Dietary Guidelines based on food processing levels, the network on Strategies to Reduce Salt Consumption for the Prevention and Control of Cardiovascular Diseases, the network on FNS Governance and Public Procurement from Family Farming, and the network on School Feeding. The networks involve collaborative processes of technical exchange between countries in the Americas, aimed at policymakers and government programs for the institution of different normative instruments, to advance these themes in the Americas.

Paragraph 8. Setting standards for and enabling better access to diet-related data for decision making, included various activities, such as:

a) Recognizing the importance of diets for health and the lack of consensus on how to measure and monitor healthy diets at scale, FAO, the United Nations Children's Fund (UNICEF) and WHO joined forces to chart a way forward via the Healthy Diets Monitoring Initiative (HDMI).<sup>17</sup> The joint mission of HDMI is to enable national and global decision-makers and stakeholders to monitor and achieve healthy diets for people and the planet. HDMI is committed to building consensus with national and global stakeholders to guide the generation of actionable, fit-for-purpose dietary data and statistics that can be used to inform evidence-based approaches, policies and programmes. HDMI aims to achieve this by raising awareness, developing guidance for healthy diets monitoring, implementing a prioritized research agenda, and facilitating the uptake and use of metrics for assessing and monitoring diets.

b) The MDD-W indicator is one of the metrics being assessed by the HDMI. MDD-W reflects the proportion of non-pregnant women who consumed foods from at least five out of ten defined food groups in the previous 24 hours, and the indicator is a proxy for better micronutrient intakes in the population. FAO led the validation studies of the MDD-W indicator and its data collection methods, has published (updated) global guidance on how to collect, analyse, and interpret MDD-W, and developed an interactive e-learning course on MDD-W to support uptake and capacity development on MDD-W.

c) FAO and UNICEF, in collaboration with the German Agency for International Cooperation (GIZ) and other UN Agencies, have supported UN Member States to prepare and submit a proposal to include the prevalence of minimum dietary diversity among women and children as a future Sustainable Development Goal (SDG) 2 indicator aiming to close an important data gap in the final stretch of the SDGs and help to complete the picture on progress towards achieving SDG 2. FAO is proposed as the custodian agency for MDD-W. The proposal requests the consideration of this indicator during the 2025 Comprehensive Review of SDG indicators. Moreover, including an indicator on populations' diets can help inform the actions needed to achieve Zero Hunger, also ensure the good nutrition, health and development of populations on which all SDGs rely.

Comments:

Considerations on indicators:

It is indisputable that establishing global indicators for monitoring target 2.2 is relevant. However, it is essential to recognize and weigh the inherent limitations of the presented indicator, as well as propose potential indicators based on scientific consensus, which are relevant for monitoring healthy diets in global populations. It is known that minimum dietary diversity is estimated from ten groups, namely: (I) cereals, roots, and tubers; (II) legumes; (III) nuts and seeds; (IV) dairy products; (V) meats, poultry, and fish; (VI) eggs; (VII) dark green leafy vegetables; (VIII) other fruits and vegetables rich in vitamin A; (IX) other vegetables; (X) other fruits. The main limitation



of the proposed indicator is that it does not consider the degree of food processing, potentially including both healthy and unhealthy food consumption. By not considering the degree of processing or stating that such foods should be excluded, dietary diversity may often include ultra-processed foods, such as industrialized bread, porridge, or processed meats.

Moreover, it is essential that dietary diversity indicators take into account not only aspects related to nutrient intake but also allow the valuation of diverse, healthy foods related to the biological, social, and cultural aspects of individuals. These indicators should promote culturally appropriate foods and sustainable production practices that also contribute to achieving other SDG targets and promote the human right to adequate and healthy food. Thus, it is important that a dietary diversity indicator values unprocessed or minimally processed foods while warning against the consumption of ultra-processed foods, whose production and distribution negatively impact the food system, and which also have an unbalanced nutritional composition, with critical nutrients (sodium, sugar, and fats) associated with non-communicable chronic diseases.

Brazil has qualified sources for monitoring the dietary intake of its population. Data from Primary Health Care follow-ups can be recorded in the e-SUS APS strategy (Electronic Citizen Record, Simplified Data Collection, and Applications) and can be accessed in the Food and Nutrition Surveillance System (SISVAN), from public reports available for nutritional status since 2008, and for food consumption markers since 2015. Currently, SISVAN monitors a set of food consumption indicators that consider the degree of food processing across all stages of the life course. Additionally, surveys such as the Household Budget Survey (POF), which in its 2008-2009 and 2017-2018 editions (public data), collected dietary intake data from Brazilians through food records and 24-hour recalls. This set of Food and Nutrition Surveillance instruments in Brazil allows for monitoring several indicators that assess healthy diets in the population, taking into account the degree of food processing, such as the consumption of ultra-processed foods, and the consumption of fruits, vegetables, and legumes, among others. This set of indicators currently has its historical series monitored by the Ministry of Health.

Paragraph 9.

Development and mobilization of tools and technical support to embed actions in support of improving nutrition across FAO's portfolio, including:

a) FAO has developed step-by-step guidance to assist countries to develop, implement and use food systems-based dietary guidelines to address their nutritional challenges and priorities while simultaneously contributing to the transformation of agrifood systems towards sociocultural and environmental sustainability. By widening the evidence base beyond the relationship between diets and health, employing a targeted agrifood systems analysis and engaging sectors and actors throughout the agrifood systems, the new approach can propel

coordinated actions, interventions and policies in food supply, food environment and consumer practices that lead to the realization of healthy diets for all.

Comments:

Considerations on Food System-Based Dietary Guidelines:

Dietary guidelines are instruments of particular importance for deepening the debate on food systems, as they aim to synthesize understandings and make recommendations on adequate and healthy diets, considering a range of factors involving public health, culture, socioeconomic issues, among others. These instruments can serve as a basis for "developing policies aimed at modifying consumption patterns towards healthier directions. [...] It is possible to identify dietary patterns that are broadly lower in environmental impact and also consistent with good health? and, in fact, represent a substantial improvement over how people currently eat (FAO, 2016)."

In this sense, FAO and WHO have advanced in reflecting on the role of diets in promoting healthy and sustainable food systems. In this regard, the entities proposed a conceptualization of sustainable and healthy diets, namely: "dietary patterns that promote all dimensions of individuals' health and well-being; exert low pressure and environmental impact; are accessible, affordable, safe, and equitable; and are culturally acceptable" (FAO; WHO, 2019).

In line with this definition, a series of principles for achieving such diets was proposed, including considering diversity within food groups, basing diets on minimally processed foods, and limiting the consumption of ultra-processed foods, selecting sustainably produced foods, consciously using natural resources, supporting local producers, preferring seasonal foods, and adapting to individuals' contexts, considering eating practices, socioeconomic status, culture, food availability, among others.

The new methodology proposed by FAO in 2024 for the creation of Food System-Based Dietary Guidelines is another step toward strengthening sustainable proposals. In this sense, it is essential that actions and policies related to food systems align with the recommendations of Dietary Guidelines that consider health and overcoming the synergistic determinants of malnutrition. Moreover, the debate on Food System-Based Dietary Guidelines must incorporate the three dimensions of sustainability, with special attention to the social dimension, considering that adequate and healthy eating derives from a socially and environmentally sustainable food system.

It is also crucial to highlight that the Brazilian Dietary Guidelines already fulfill the steps stipulated by FAO's new methodology for Food System-Based Dietary Guidelines, even though this is not officially recognized by the entity. Therefore, it is important that this new methodology also has mechanisms to recognize existing

guidelines that promote the food system perspective, without having to formally comply with FAO's methodology steps.

Paragraph 9(c) The Agrifood Systems Pathways to Healthy Diets approach, championed by FAO, focuses on programme design and operations to enhance access to nutritious foods while mitigating vulnerability and addressing environmental challenges. This entails prioritizing pathways within agrifood systems, considering costs, conducting reviews, promoting evidence-based approaches for replication, engaging decision-makers, supporting capacity development, and integrating nutrition-sensitive practices throughout agrifood systems.

d) FAO supports and empowers governments to leverage food markets to implement policies and guidelines to ensure that diverse, safe and nutritious foods are consistently available in both public and private markets, enhancing profitability and efficiency. This contributes to the national commitments pledged in various high-level processes, such as the National Pathways to sustainable food systems, following the UNFSS in 2021. Specifically, FAO supports governments by:

i. Developing good practice guidance on how to support agrifood micro small and medium enterprises to increase the availability of nutritious food in public and private markets in a sustainable and profitable way with a nutrition-sensitive value chain approach.

ii. Promoting and supporting the implementation of sustainable public food procurement and home-grown school feeding policies and programmes to enhance the accessibility of nutritious food and trigger agrifood systems transformation.

Comments:

Considerations on the Production and Access to Healthy Foods:

At this point, it is important to reinforce the orientation for the implementation of public policies that strengthen healthy and sustainable food systems that prioritize the diversified production of food by family farming, with the capacity to promote food supply through short production and consumption circuits, encouraging health-promoting dietary practices based on dietary guidelines that consider healthy and sustainable food systems. This type of action can contribute to the prevention and promotion of health and food and nutrition security by increasing the availability of fresh and minimally processed foods, strengthening the creation of healthy food environments, and supporting actions to prevent and control obesity and related diseases, such as non-communicable chronic diseases, and addressing all forms of malnutrition.

Another relevant point for the health sector regarding food and nutrition relates to driving coordinated actions, interventions, and policies in food supply. To achieve this, food systems can rely on the structuring of food supply

information systems that include health indicators, such as population dietary intake, anthropometric data, and food insecurity status, to guide actions, interventions, and policies aimed at contributing to public health aspects such as addressing multiple forms of malnutrition, hunger, and food and nutrition insecurity.

Paragraph 10. Generating good practice and guidance on nutrition, for which consensus building and data and evidence reviews are required, including:

a) Responding to the current high visibility of healthy diets, yet mixed messages that exist, particularly in the public media about what constitutes a healthy diet, FAO is working closely with WHO to develop a joint statement on the core principles of healthy diets.

Comments:

Considerations on the fundamental principles of healthy diets:

When addressing the topic of healthy diets, it is essential to define what constitutes a healthy diet for countries. In Brazil, adequate and healthy eating is understood as "an eating practice appropriate to the biological and socio-cultural aspects of individuals, as well as the sustainable use of the environment, in accordance with the needs of each stage of the life course and special dietary needs; referenced by food culture and the dimensions of gender, race, and ethnicity; physically and financially accessible; harmonious in quantity and quality; based on appropriate and sustainable production practices with minimal amounts of physical, chemical, and biological contaminants." This concept is expressed in the National Food and Nutrition Policy and is used to establish the fundamental principles and recommendations of the Brazilian Dietary Guidelines.

In this sense, it is emphasized that each country should base its guidelines on adequate and healthy eating on its own dietary pattern, based on fresh and minimally processed foods, suitable for its population, considering health-promoting practices that respect cultural diversity and are environmentally, culturally, economically, and socially sustainable.

Paragraph 10(c) Similarly, over the past years, there has been a proliferation of messaging in many countries globally about the opportunities presented by animal source foods (ASF) alternatives. These alternatives are referred to by a variety of names and include a variety of product types. To date, there has been no robust synthesis of the current state of evidence related to the potential risks and benefits of such products across the diverse potential areas of impact including nutrition and health, food safety, environment and socioeconomic considerations. To address this gap, FAO has formed an internal Task Force and commissioned a series of evidence reviews to inform of the Organization's position on the current state of ASF alternatives.

Comments:

Alternatives to Animal Source Foods:

Regarding alternatives to animal-source products, the caution lies in the level of processing. Whether based on animal or plant origins, an ultra-processed food brings negative impacts on health, food security, the environment, and consequently, on the socioeconomic dimensions of individuals, populations, and governments. Therefore, recommendations on plant-based foods should be based on the principle of dietary diversity, encouraging the consumption of fresh and minimally processed plant-based foods, with variety, cultural relevance, preferably agroecological, and derived from the socio-biodiversity of each country.

Brazil has one of the most remarkable biodiversities on the planet, yet this diversity is not always reflected in the diets consumed by Brazilians. Thus, before the effort to explore these products, it is necessary to reinforce and create mechanisms to incentivize the production and consumption of agroecological plant-based foods, diversifying their possibilities for variation and combinations.

Paragraph 12. Many of the actions noted above are part of efforts to elevate healthy diets as part of the agenda of nutrition for governments and other stakeholders. But significantly more effort is still needed to garner the commitment and inform about effective actions that can achieve dual outcomes for agrifood systems' resilience, profitability and enabling access to healthy diets. Guidance is sought from COAG on opportunities and methods to advance this agenda.

Comments:

Way Forward:

Regarding opportunities to advance the agenda, it is important to highlight the need to improve and deepen Area of Action 2 in the document "Vision and Strategy for FAO's Work in Nutrition," which concerns generating, gathering, and sharing evidence on policy options and actions for agri-food systems that enable adequate and healthy diets, while exploring trade-offs and synergies with other agri-food system outcomes. Therefore, it is suggested to expand FAO's involvement in the issue of food environments that promote adequate and healthy eating.

Such an agenda demands the inclusion of regulatory topics such as front-of-package warning labels for ultra-processed foods, or at least for foods high in critical nutrients (sodium, added sugar, and fat) and restrictions on the marketing of ultra-processed foods. Fiscal measures should also be considered, such as special taxation of

	<p>unhealthy foods and tax exemptions for healthy foods (fresh and minimally processed). Special emphasis should be placed on food environments, including commercialization and institutional spaces, such as schools.</p> <p>Furthermore, it is essential that there be mechanisms to prevent conflicts of interest in all actions aimed at promoting adequate and healthy eating and sustainable food systems, to overcome the multiple burdens of malnutrition. Additionally, it is important that international organizations like FAO and WHO deepen discussions on mechanisms for implementing dietary guideline recommendations in intersectoral policies. In this regard, Brazil has had significant experiences in implementing the guidelines from the Brazilian Dietary Guidelines in policies that encompass different sectors, addressing everything from food production to consumption, including health, education, taxation, production, and supply, all of which impact the food system.</p>
<p><b>United Kingdom</b> Saturday, 21 September 9:13AM</p>	<p>The United Kingdom welcomes the opportunity to provide written comments on the FAO's work in nutrition and request that for COAG30, an item on nutrition be included for substantive discussion in plenary by the Committee. This would reflect the importance of nutrition for everything FAO does and therefore the need for COAG to consider how best to help FAO further integrate and embed nutrition across its entire policy and programmatic portfolio.</p> <p>As evidenced through our support to FAO and other organisations and governments on nutrition, the UK is deeply committed to ensuring that nutrition is integrated into policy and programmatic work in a way that capitalises on synergies and the opportunities for triple wins across people, planet and prosperity. In this regard, we draw attention to FAO's work on <i>Agrifood Systems Pathways to Healthy Diets</i> and would welcome further analysis for members on its impact, drawing on their country-specific and cross-country pilots. We would also like to understand how the evidence reviews across sectors are now being incorporated into FAO's own cross-sectoral work, across different Divisions and Programme Priority Areas. We also look forward to findings from the FAO Strategic Framework review and hope that the process will allow for even greater ambition on nutrition integration and food systems approaches.</p> <p>The UK notes from the document (COAG/2024/13) the work being done by FAO on developing data systems. We are supportive of this work, particularly the FAOSTAT Food and Diet Domain and the global nutrient conversion table. However, we note that the document (COAG/2024/13) does not set out in detail how FAO is sharing and utilising this data in collaboration with other organisations, particularly other multilateral organisations. We would welcome further detail being provided on this. The UK itself recognises the importance of transparent and effective data sharing and recently published our 11th annual Nutrition Accountability Report, setting out how the UK Government is delivering against its commitments on nutrition.</p>

	<p>The UK welcomes the development of new guidelines on country level capacity mentioned in the document (COAG/2024/13) but we would also welcome further clarity on how the implementation of these guidelines is being monitored and evaluated. We note that the document (COAG/2024/13) notes insufficient country-level capacity on nutrition but does not set out a clear plan of action to address this. Related to wider conversations on country office decentralisation and capacity, we would welcome further clarity on this issue. There is some mention of potential development of regional hubs of expertise for nutrition, which could be used as a way of deploying existing resource more efficiently and effectively.</p> <p>The UK welcomes FAO’s continued leadership role in the Initiative on Climate Action and Nutrition initiated at COP27 in Egypt. From a food systems perspective, it is crucial that the complex, bidirectional linkages between nutrition and climate be better understood and better integrated across global nutrition and climate work. This includes understanding both over-consumption and under-consumption of animal source foods between and within different countries and regions, and the climate impacts of certain forms of production, as well as the role that alternative proteins can play in nutrition and environmental transition.</p> <p>We therefore welcome the incorporation of nutrition considerations into work on the Global Roadmap for Achieving SDG2 Without Breaching the 1.5°C Threshold but would like to ask FAO to respond to the following questions: [i] when will the full global roadmap, including its methodology be released; and [ii] what are FAO’s plans for the regional roadmaps. It is crucial that the process behind the roadmaps is both evidence-based and consultative.</p> <p>Finally, the UK welcomes the global advocacy role that FAO plays on nutrition, including the successes noted in paragraph 7 of the document (COAG/2024/13) (and its sub-paragraphs). Working in partnership with others is key to these successes. In this regard, we look forward to FAO being ambitious in its approach to the Nutrition for Growth Summit in Paris in 2025, and to fast-tracking achievement of its commitments from the previous N4G Summit in Tokyo. Similarly, we look forward to FAO playing a positive role at the SUN Global Gathering in Kigali this year, as well as working closely with the Food Systems Coordination Hub in terms of preparations for the UN Food Systems Summit +4 Stocktake, including to ensure that nutrition continues to be mainstreamed through the work on Food Systems Transformation Pathways</p>
<p><b>Canada</b> Monday, 23 September 11:35AM</p>	<p>Canada offers the following comments for consideration, related mainly to the guidance requested under element b): <i>provide guidance</i> on opportunities and methods to advance the agenda of nutrition for governments in support of accelerating policies and actions with impact across agrifood systems to enable healthy diets for all.</p> <p><b>General comment</b></p>

- FAO has made commendable progress in implementing the objectives of the *Vision and Strategy for FAO's Work in Nutrition*, which was endorsed by FAO Council in 2021. This includes, for example, advances in enhancing availability, access, and utilization of data to inform actions in countries.

### **Policy Coherence**

- It is appropriate that the Strategy recognized the need for policy coherence. Nutrition is a critical component of Sustainable Development Goal 2 (SDG 2), Zero Hunger. Specifically, target 2.2 aims to end all forms of malnutrition by 2030. Also target 7.2 to halve global per capita food loss and waste reminds to avoid solving one problem by exacerbating another. Both nutrition and trade policy are included in the Sustainable Development Goals (SDGs), which call for greater coherence between policies in the implementation of the Goals.
- The FAO progress report acknowledges the need for effective actions that can achieve outcomes for agrifood systems' resilience and profitability while enabling access to healthy diets. To this end, governments should, where appropriate, budget for and integrate nutrition objectives into their national agricultural and other relevant policies, and also consider sustainable food system dimensions in their nutrition and health policies, to achieve healthy diets through sustainable food systems.
  - In FAO's support of initiatives, it would be appropriate to ensure a broad, interdisciplinary or whole-of-government approach whereby economic aspects are also considered in health policy, which is consistent with recognition of the two-way benefits.
- With a view to promoting policy coherence, it could be helpful for FAO's work on nutrition to consider relevant elements from the complementary work related to food systems undertaken by OECD Agricultural Policies and Markets:
  - [Making Better Policies for Food Systems | OECD](#)
  - [Food Systems and the Triple Challenge | OECD](#)
  - [Overcoming evidence gaps on food systems | OECD](#)
- It would be important to reflect the triple challenge faced by global agriculture and food systems: providing food security and nutrition, providing livelihoods to those along the food supply chain, and contributing to environmental sustainability. This includes, for example, considering both synergies and trade-offs between the different dimensions of the triple challenge, and what this means for the design of coherent policies for the global food system.



- One of the challenges for the design of coherent policies is achieving an appropriate degree of inter-governmental coordination and engagement with stakeholders while avoiding excessive bureaucracy. To that end, it would be helpful for FAO to engage—and encourage others to engage—agriculture and agri-food stakeholders early in the policy development process, to benefit from their unique perspective and to avoid unintended consequences, as well as to consider consumer research and other unique evidence sources available from industry stakeholders, along with the scientific evidence. For example, regulatory burden has an impact on industry innovation which in turn can impact ability to develop health-promoting and value-added food products which improve health and provide downstream employment.

#### **Data and evidence**

- Agricultural policy in all countries, including developing countries, must be based on evidence. Considering the changing global food demand and supply structure, there is an opportunity to consider examples where data from surveillance activities would be beneficial across all aspects of food systems and outcomes related to food security.
  - o For example, support for maintaining and building upon agricultural food availability statistics (e.g., production, import, export, waste data) would enhance understanding of how food production links with energy and nutrient intake requirements, with greater emphasis on more granular commodity categories and processed food data. This will allow development of policy and program recommendations to support shifts in production practices intended to address health requirements and improve health outcomes. It will also help inform dietary guidance and labelling requirements, and direct research and funding program priorities to support enhanced nutritional and functional attributes of food products.
  - o FAO's progress report includes actions toward helping to address data gaps in food consumption and food composition. It is important for countries to ensure that they have food composition data available that reflect the food supply and retail marketplace, to support better-quality interpretation of consumption data and better-informed decisions on food and nutrition policies, guidelines, and regulations. While many countries have national or regional food composition tables or databases, some include incomplete, outdated, and/or unreliable data that may not reflect the actual foods available on the market.
- It is important to support analysis that would ensure that any demand-side policies are evidence-based so that ultimately any measures taken would have the intended consequences.
  - o For example, FAO mentions its work on assessing the contribution of livestock to food security,

sustainable agrifood systems, improved nutrition, and the consumption of healthy diets. If considering ways of promoting increased consumption of plant-based sources, it may be appropriate to identify opportunities for plant-based foods and alternative proteins, rather than plant-based diets, which tend to be promoted particularly to the detriment of animal products. Any type of food can be produced in a more sustainable way. Within the same foodgroup, environmental impact may vary significantly, depending on many factors including production and processing methods, origin, packaging, and transport methods.

- o FAO's progress report mentions that FAO has developed a new modelling methodology that can provide policy-relevant inputs related to fiscal policies for agriculture and trade that simultaneously optimize agriculture outcomes and contextually appropriate dietary patterns. Should taxation be promoted as a means of reducing purchases and/or consumption of certain food products, which FAO has promoted in other contexts, it would be important to note that outcomes of consumption taxation measures are complex; e.g., they disproportionately affect the economically disadvantaged and there is evidence of substitution effects.
- o FAO's progress report mentions that FAO has formed an internal Task Force and commissioned a series of evidence reviews to inform FAO's position on the current state of animal source foods (ASF) alternatives. It will be important to engage broadly for evidence to inform this work, including related to the potential risks and benefits of such products across the diverse areas of potential impact, including nutrition and health, food safety, environment, and socioeconomic considerations.
- The United Nations' Committee on World Food Security's definition of food security includes access to food that meets food preferences. This is particularly important in an Indigenous context, as food plays a central role in Indigenous identity, social well-being, culture, spirituality, and traditions, resulting in significant impacts on communities when traditional food is inaccessible. Perhaps there is a way to track this important element of food security.

#### **Food processing / food technology / supporting innovation**

- The FAO Strategy recognizes the importance of food processing in food security, food safety, and nutrition. The agri-food system includes production, processing, distribution, trading, marketing, selling, preparation, serving, consumption, and disposal of food.
- The Strategy mentions the importance of innovation, specifically the importance of “accelerating the pace and widening the scope of policy, institutional, organizational, technological, social and financial innovation including digitalization and technology transfer and uptake”. The OECD report *Making Better*

*Policies for Food Systems* notes that consultations with industry and public/private partnerships are crucial so that policies are practicable and regulations do not impede industry innovation.

- It is important to support innovation and new technologies, which will be key drivers for the competitiveness of the agriculture and agri-food sector as the global demand for food to meet nutrition goals continues to increase. FAO could help governments develop ways to assess potential health risks, as well as possible benefits for food security and nutrition, of new food products developed through emerging technologies, as appropriate, taking into account scientific risk assessments and Codex standards where available, as with any new food product. It will be important to continue to recognize that the use of food technology is not inherently problematic, and that many food technologies (e.g., gene editing) can bring important benefits that support food security and nutrition.
  - o New trends are emerging such as cellular agriculture and vertical farming. These products could help address future challenges in sustainably feeding the global population. Evidence-based research on safety, quality, and nutritional value will be as important as education on these new technologies to ensure successful commercialization and informed consumer decision-making.
  - o Encouraging retention of the nutritional value during food processing would support nutrition. FAO could encourage investment by governments, private sector, and other relevant stakeholders to support training for food producers, handlers, and processors to implement national, science- and evidence-based, risk-based measures that can provide safe food while retaining their nutrient content.
- FAO's progress report mentions its work to assist countries to develop food systems-based dietary guidelines, as well as its work with WHO to develop a joint statement on the core principles of healthy diets. For both of these initiatives, it will be appropriate to continue to focus on nutrients of public health concern rather than level of processing, similar to the CFS Voluntary Guidelines on Food Systems for Nutrition. This is where the strength of evidence lies and is consistent with other nutrition messages. As recognized for example in the OECD report *Making Better Policies for Food Systems* (e.g., Chapter 6), there is no universally agreed upon categorization system for the diverse array of products that come from the processed food sector, and there are significant evidence gaps, which could lead to misinterpretation.
- Maintaining public trust in the food system is fundamental to achieving an effective food system that supports nutritional health. Food and nutrition education is important for enabling consumers to make informed food- and dietary choices. Sharing research and developing consistent messaging can also address misconceptions about food processing and environmental sustainability. Food production is only

	<p>one factor impacting environmental sustainability; all countries should be encouraged in their efforts to improve environmental sustainability regardless of the type of food production.</p>
<p><b>European Union and its 27 Member States</b> Monday, 23 September 4:16PM</p>	<p>Madam/Mr Chair,</p> <ol style="list-style-type: none"> <li>1. I am honoured to speak on behalf of the EU and its 27 Member States.</li> <li>2. The EU and its Member States would like to thank the FAO Secretariat for its extensive work on ‘the Vision and Strategy for FAO’s Work in Nutrition’.</li> <li>3. We commend FAO for its achievements so far. We note, however, that the challenges associated with nutrition persist on a global level, thereby demonstrating the importance of continued efforts. The 2024 SOFI report once again underlines that the world is “off track” to achieve SDG 2. At least 733 million people go hungry every day. In 2023, 9,1% of the world population was suffering from hunger. Strengthening Food and nutrition security must be our main common goal. Action is required on several levels, from local to regional, national and global.</li> <li>4. We emphasise the importance of multistakeholder collaboration since nutrition is a multidimensional issue that spans several policy areas and involves many actors.</li> <li>5. In that spirit, we underline our support for the continued work with the coalitions that were launched during the UN Food Systems Summit 2021, not least the work in the School Meals Coalition and the Coalition of Action on Healthy Diets from Sustainable Food Systems for Children and All (HDSFS).</li> <li>6. In addition, facilitating peer-to-peer learning between countries is a good example of how to take this work forward.</li> <li>7. Finally, we would like to draw attention to the forthcoming Nutrition for Growth (N4G) Summit to be held in Paris next year, and trust that it will present another important opportunity for building on the momentum achieved at the 2021 Summit in Japan, and that it will make a crucial contribution to achieving the SDGs.</li> <li>8. We look forward to a continued fruitful collaboration.</li> </ol> <p>Thank you, Madam/Mr Chair.</p>
<p><b>Norway</b> Wednesday, 25 September 9:57AM</p>	<p>The committee is invited to provide guidance on format options that could be considered for the proposed dialogues at the end of the UN Decade of Action on Nutrition (2016-2025) to reflect on the way forward to continue advancing nutrition beyond 2025.</p> <p>Norway would like to remind ourselves that we still have a long way to go in eradicating hunger and malnutrition. The SOFI report shows that the progress in terms of food security and nutrition is heading in the wrong direction.</p>

	<p>The number of hungry and malnourished people is increasing. There is a need to raise awareness about nutrition and health dimension of the food systems. Extending the UN Decade of Action on Nutrition until 2030 could be considered, with the goal of increasing attention and effort to its important topics in the final push to achieve the UN Sustainable Development Goals, by 2030.</p> <p>The end of the Nutrition Decade in 2025 could be marked with an event by the FAO/WHO secretariate to evaluate what has been achieved, but it could also be a kick-off conference, to set a new course to gain attention and spur more actions towards 2030. Norway leads the Global Action Network on Sustainable Fisheries and Aquaculture for Food Security and Nutrition under the UN Decade of Nutrition. We have already committed to continue the Global Action Network until 2030, to promote this important agenda.</p>
<p><b>United States of America</b> Wednesday, 25 September 3:56PM</p>	<p>The United States appreciates the important work of FAO on nutrition and thanks the FAO for preparing this report and detailing its activities. We look forward to continuing to monitor FAO's nutrition work in the future.</p>
<p><b>Italy</b> Monday, 30 September 9:50AM</p>	<p>First of all, Italy aligns itself with the statement of the European Union and its 27 Member States, as delivered by Hungary.</p> <p>Italy has always supported healthy diets and nutrition and its Mediterranean Diet is the epitome of this long, innate approach of its culture started ever since.</p> <p>The Mediterranean Diet, which became a UNESCO World Heritage in 2010 and is also supported by FAO and WHO, promotes healthy lifestyles and helps to prevent cardio-cerebrovascular diseases, by preserving at the same time the Italian food heritage.</p> <p>It has become a model to face the challenges posed by the SDGs of the Agenda 2030 and the European Farm to Fork strategy for reducing the environmental impacts of agrifood systems</p> <p>The current guiding instrument for the Italian food policies is the “Guidelines for a healthy diet”, based on European recommendations, whose last version is supported by a scientific dossier drawn up by CREA (Council for Research in Agriculture).</p> <p>These guidelines go along with the “Models of healthy and sustainable diets starting from traditional diets” of the Italian Ministry of Health, that fits into the broader framework of climate-smart food systems.</p>

The Healthy Sustainable Diet in Italy has a direct impact on many of the 17 SDGs and can contribute to prevent all forms of malnutrition, to protect the environment and planet and help the livelihood of local producers.

Italy has concretely addressed the dissemination of sustainable and healthy food by carrying out 'Fruits and Vegetables in Schools', a programme promoted by the European Union and implemented by the Ministry of Agriculture, Food Sovereignty and Forestry in collaboration with others.

Such programme is aimed at primary school children with the aim of increasing the consumption of fruit and vegetables and raising awareness of the benefits of a healthy diet.

It is intended to emphasise that the strength of 'Made in Italy' lies in quality, product variety and biodiversity, a set of values that are fundamental to our culture and health and that have to be transmitted also at school.

The MASAF also defined the allocation of the Fund for Organic School Canteens in a decree of July 2024, aimed at promoting the consumption of organic and environmentally sustainable products in school meals and reducing food waste. Part of the funds is earmarked for the implementation of information and food education initiatives on organic farming in schools.

Italy thus remains committed to cooperate with and stick to FAO and the UN good practices and guidance, to promote the One Health Approach and to support the UN work in the next-to-come 2025 Paris Nutrition for Growth Summit, as also pledged by the Italian Presidency in the just concluded G7 on Agriculture.

Thank you.