CFS POLICY PROCESS ON THE DEVELOPMENT OF THE VOLUNTARY GUIDELINES
ON FOOD SYSTEMS AND NUTRITION

TEMPLATE FOR SUBMISSIONS

1. Does Chapter 1 adequately reflect the current situation of malnutrition and its related causes and impacts, particularly in line with the goals and targets of the 2030 Agenda? What are the underlying problems that currently hinder food systems to deliver healthy diets?

Chapter 1 adequately describes the complex crises contributing to malnutrition in all its forms, and we agree that urgent action is needed to address these challenges. IFBA recognizes the responsibility business has to contribute to global health, and we are committed to working in partnership with a wide range of stakeholders to seek collaborative solutions.

2. What should be the guiding principles to promote sustainable food systems that improve nutrition and enable healthy diets? What are your comments about the principles outlined in Chapter 2? Are they the most appropriate for your national/regional contexts?

IFBA supports a systemic and holistic, evidence-based approach to addressing malnutrition in all its forms. We encourage CFS to consider the private sector as a capacity-building partner – alongside other nutrition and food systems actors – while developing upcoming versions of the Voluntary Guidelines.
3. In consideration of the policy areas identified in Chapter 3 and the enabling factors suggested in paragraph 41 of the Zero Draft, what policy entry points should be covered in Chapter 3, taking into account the need to foster policy coherence and address policy fragmentation?

IFBA recognises that food and beverage marketing has an impact on food choices, food preferences and food behaviours, including children and adolescents. We fully subscribe to the World Health Organization Recommendations to reduce the impact on children of marketing of foods high in saturated fats, trans-fatty acids, free sugars, or salt (commonly referred to as ‘HFSS’ products). Moreover, we support the notion that this policy may be implemented through a variety of approaches (paragraph 22): “Statutory regulation is one approach through which implementation and compliance are a legal requirement. Another approach is industry-led self-regulation, which covers whole industry sectors, for example the advertising sector, and can be independent of government regulation”. In order to avoid policy fragmentation, focus should be on the outcome (effectively reducing impact on children), rather than the means (regulation versus co-regulation or self-regulation).

4. Can you provide specific examples of new policies, interventions, initiatives, alliances and institutional arrangements which should be considered, as well as challenges, constraints, and trade-offs relevant to the three constituent elements of food systems presented in Chapter 3? In your view, what would the “ideal” food system look like, and what targets/metrics can help guide policy-making?

Collaboration with industry, as was demonstrated when IFBA announced its support for the WHO package on industrial trans-fat elimination, can deliver public health benefits. Our members are committed to collaborating with all stakeholders to find smart, diverse solutions to global health challenges while creating new and improved nutritional products and smaller portions, empowering consumers to make informed choices, and encouraging others in our industry to take action. Including opportunities for public-private partnerships as an essential component of a whole-of-society approach is key to developing a healthy and sustainable global food system.

As an example of a specific collaborative intervention, IFBA companies have actively self-regulated in the area of marketing to children, in partnership with the World Federation of Advertisers. Since 2009, IFBA has committed not to advertise to children under the age of 12 at all, or only advertise to this age group products that meet common nutrition criteria based on accepted science-based dietary guidance. Beyond this global policy, WFA and IFBA support the launch of responsible food and beverage marketing “pledges” or industry-wide codes prohibiting the advertising of nutritionally non-compliant products to children around the world. To date, these pledges cover 55 markets worldwide.
5. How would these Voluntary Guidelines be most useful for different stakeholders, especially at national and regional levels, once endorsed by CFS?

Multistakeholder partnerships are critical to achieving the six Global Nutrition Targets and the transformative change called for in the 2030 Agenda, and IFBA is in full support of Sustainable Development Goal 17 around partnerships for the goals and the UN HLM Political Declaration on NCDs. We support the principles for implementation and monitoring as laid out in Section IV, particularly sections 59 and 61 which recommend platforms for multistakeholder partnerships to achieve improved nutrition outcomes at country level.