

Your Excellency, Amina Jane Mohammed, Deputy Secretary-General United Nations Headquarters
760 United Nations Plaza
Manhattan, New York 10017-6818
United States of America
By email to: sgcentral@un.org

July 4, 2025

Re: Food systems relevant conflict of interest safeguards in the Food and Agriculture Organization and UN-wide as context for concerns about industry influence of the 4thUnited Nations Food Systems Summit Stocktake

Your Excellency,

Further to our Zoom meeting last Friday, I am writing to furnish links to the documents I mentioned. The following illustrates that there is general UN-wide acknowledgement of the potential harm of undue influence of industry in public health and food governance and standard-setting. However, sometimes or often, stated concern does not lead to changes in institutional practices in UN agencies.

The Secretariat of the Civil Society and Indigenous Peoples Mechanism (CSIPM) for relations with the Committee on World Food Security (CFS) will continue to be the focal point for that organization. I defer to the CSIPM Secretariat's analysis about the inadequacy of conflict-of-interest safeguards specific to the Food Systems Summit.

1. Report of the UN Joint Investigations Unit

In 2018, the Secretary-General tabled in the General Assembly a 53-page review of United Nations conflict-of-interest policies. That report provided the following **definition of institutional/organizational conflicts of interest:**

"a situation, where, because of other activities or relationships, an organization is unable to render impartial services and the organization's objectivity in performing mandated work is or might be impaired, or the organization has an unfair competitive advantage."

One of the review's main findings was:

"organizational conflicts of interest remain an unexplored territory that the present review could not fully tackle owing to insufficient information being provided by the participating organizations. A system-wide mapping exercise and the development of a guide should be undertaken (recommendation 1)."

The report also found:

87. During the review, it was observed that neither the Ethics Panel of the United Nations nor Ethics Network of Multilateral Organizations had so far dealt with organizational conflict of interest. Very few Ethics Officers and officials of the organizations that responded to the questionnaire and were interviewed gave concrete feedback on organizational conflict of interest.

That report of the Joint Inspection Unit recommended:

Recommendation 1

Executive heads of the United Nations system organizations should direct their officials entrusted with the ethics function to map the most common occurrences and register the risks of situations exposing their respective organizations to organizational conflicts of interest, no later than December 2019.

2. Reports of the UN Ethics Office, 2020-2023²

The Secretary-General relayed the 2019 Report on the Activities of the UN Ethics Office to the General Assembly, which stated in part:

- 11. Risks of a Conflict of interest can generally be found at two levels: organizational and personal. An organizational conflict of interest arises where an organization is unable to render impartial services because of its other activities or relationships or has an unfair competitive advantage. A personal conflict of interest arises when the private interests of individuals interfere or may be perceived to interfere with their performance of official duties. Both types of conflicts of interest may affect the reputation and credibility of the United Nations if not detected and managed in a timely manner...
- 19. In 2019, the Ethics Office responded to <u>27 requests on matters relating to institutional integrity,</u> including potential conflicts of interest involving the Organization's engagement in various business operations with stakeholders. The category also includes 10 requests from the secretariat of the Vendor Review Committee. Such advice covers conflicts of interest and reputational risks at the organizational level, as well as due diligence reviews for reputational risks involving external entities...
- 57. On preventing and managing conflicts of interest, the [Ethics Panel of the United Nations and Ethics Network of Multilateral Organizations] exchanged information on good practices on pre-appointment vetting, financial disclosure and declaration of interest programmes. Members supported their respective organizations in implementing the recommendations of the Joint Inspection Unit's report on the review of mechanisms and policies addressing conflict of interest in the United Nations system (JIU/REP/2017/9), where applicable. They discussed conflict of interest mapping and improvements to a conflict-of-interest management framework, including ways to deal with non-compliance with disclosure obligations. [emphasis added]

Institutional integrity

17. The Ethics Office responded to 45 matters relating to institutional integrity, an increase from 28 such matters in 2019. Institutional integrity issues include potential conflicts of interest involving the Organization's engagement in various business operations with stakeholders. The category also includes requests from the secretariat of the Vendor Review Committee. Such advice covers conflicts of interest and reputational risks at the institutional level, and due diligence reviews for reputational risks involving external entities. The increase may result from greater awareness in offices and among staff of ethical challenges to the Organization in engaging with other stakeholders. ___4 [emphasis added]

The 2021 report states, in part:

Institutional integrity

- 26....The Ethics Office responded to 56 questions on matters of institutional integrity. These matters are subdivided into three areas: institutional conflicts of interest (46), due diligence reviews of partners and donors (5) and procurement ethics (5).
- 27. Examples of institutional conflicts of interest include the ad hoc use of organizational resources or specific operational processes and procedures that may cause an unintended conflict of functions. They may involve invitations for the Organization to participate in certain activities or processes by external entities or individuals or offers of gifts, honours or pro bono goods and services to the Organization. Given the increasingly multistakeholder approach, including partnerships with civil society organizations and businesses, to advancing and achieving United Nations mandates, there is a commensurate need to ensure that achieving results does not undermine the Organization's integrity. [emphasis added]

The 2022 report states, in part:

Institutional integrity

- 21. The Ethics Office responded to <u>85 questions on matters of institutional integrity. These matters are subdivided into three areas: institutional conflicts of interest (56)</u>, due diligence reviews of partners and donors (24) and procurement ethics (5)...
- 23. The Office received 24 requests for advice on the performance of due diligence reviews, compared with 5 requests received in 2021. There are four primary reasons for this increase: (a) entities see the benefit of engaging with the private sector in their efforts to meet the Sustainable Development Goals; (b) liquidity and budget constraints have led Secretariat entities to seek funding from non-traditional sources, such as the private sector; (c) the Ethics Office has been raising awareness on the reputational risks associated with engaging with the private sector; and (d) the Department of Management, Strategy, Policy and Compliance issued guidelines that programme managers should

consult with the Ethics Office for assistance in vetting potential private sector donors. ⁶ [emphasis added]

The 2023 report states, in part:

Institutional integrity

- 24. In 2023, the Ethics Office responded to <u>93 queries on matters relating to institutional integrity. These matters are subdivided into three areas: organizational conflicts of interest (72)</u>; due diligence reviews of partners and donors (8); and procurement ethics (13).
- 25. During the reporting cycle, the Office reviewed 72 organizational conflicts of interest, representing a 28 per cent increase, from 56 queries in 2022. These included requests for staff, in their official capacity and representing the Organization, to participate in activities related to the work of the Organization; invitations for the Organization to participate in activities organized by external entities or individuals; questions relating to various aspects of the Organization's business operations; and offers of gifts, honours or pro bono goods and services to the Organization. [emphasis added]

3. Draft treaty on business and human rights

As I am sure you are aware, a United Nations Human Rights Council Open-Ended Working Group has been negotiating a treaty⁸ to establish international standards protecting human rights from abuses by corporations (and related violations by governments) for more than a decade with two years remaining in a roadmap to completion. Although several divergent approaches remain to establishing safeguards against conflicts of interest (or undue influence) by private sector actors, none of the approaches are dismissive. Indicative examples of current text options include:

- "6.3. State Parties shall ensure that competent authorities relevant to the implementation of Article 6.2 have the necessary independence, in accordance with its legal system, to enable such authorities to carry out their functions effectively and free from any undue influence...
- 6.4. Measures to achieve the ends referred to in Article 6.2 shall include legally enforceable requirements for business enterprises to undertake human rights due diligence as well as such supporting or ancillary measures as may be needed to ensure that business enterprises while carrying out human rights due diligence:

The following provision has not been challenged with alternative textual proposals:

16.6. In implementing this Legally Binding Instrument, State Parties shall protect public policies and decision making spaces from undue political influence by businesses.

4. Series of UN High-level political declarations on non-communicable disease (re food, tobacco, and alcohol), and civil society joint-statement, 2011-2025

The Political Declaration of the 4th High Level Meeting on the Prevention and Control of Non-communicable Diseases will presumably include guidance on conflict-of-interest safeguards, like the previous three even though the Zero Draft of the 4th declaration did not.⁹ In May 2025, my organization submitted a call for doing so—supported by 145 ECOSOC-accredited NGOs—at the multistakeholder consultation in New York.¹⁰

While the 2011¹¹ Political Declarations only acknowledged concern about the harmful influence of the tobacco industry, the heads of state and government agreed in 2014 to:

29. Recall that effective non-communicable disease prevention and control requires leadership and multisectoral approaches to health at the governmental level, including, as appropriate, health-in-all-policies and whole-of-government approaches across sectors beyond health, while protecting public health policies for the prevention and control of non-communicable diseases from undue influence by any form of real, perceived or potential conflict of interest;.¹²

Likewise, the 2018 high-level political declaration states:

43. Engage with the private sector, taking into account national health priorities and objectives for its meaningful and effective contribution to the implementation of national responses to non-communicable diseases in order to reach Sustainable Development Goal target 3.4 on non-communicable diseases, while giving due regard to managing conflicts of interest; 13

Large networks of civil society organizations urged member states to implement conflict of interest safeguards in the Political Declaration of the United Nations Coalition on Prevention and Control in 2011, 14 2014, 15 and 2018. 16

5. Civil society commentary on the Summit of the Future concerning the 2030 Sustainable Development Goals.

In September 2024, my organization published and submitted to member states a call for conflict-of-interest safeguards at the Summit of the Future in New York that was endorsed by 267 civil society organizations accredited by the UN Economic and Social Council.¹⁷ That statement indicates, in part:

WHO, Harvard School of Public Health, Institute for Health Metrics and Evaluation, and Lancet commission experts estimate:

- malnutrition in all its forms causes 11 million deaths per year and nearly half of deaths of children under age 5,
- tobacco causes 8 million deaths/year.
- air pollution from burning fossil fuels causes 8 million deaths/year,

- inadequate water supply, sanitation, and hygiene causes 3.5 million deaths/year,
- alcohol causes 2.6 million deaths/year,
- toxic chemicals and pesticides cause 2 million deaths/year,
- <u>suboptimal breastfeeding driven by promotion of breastmilk substitutes causes</u> 823,000 deaths/year.

Of the <u>US\$101 trillion global economy</u>, people spend:

- \$10 trillion on food, including breastmilk substitutes,
- \$1 trillion on tobacco,
- \$1 trillion on fossil fuels,
- \$1.5 trillion on gas/diesel passenger cars, and
- more on furnaces, cooking equipment, and other machines that are powered by fossil fuels.

The non-communicable diseases that many of these products cause more than doubles their market cost to equivalent to half of the global <u>commercial economy</u>, with most of the burden borne by the public sector, including harm to human health, reduced productivity of all industries, greenhouse gas emissions, pollution, and the largely uncalculated ravages child labour and unlivable wages. For instance:

- The UN Food and Agriculture Organization estimated that global food systems imposed \$12.7 trillion (in 2020 Purchasing Power Parity dollars) in externalized costs, due mainly to poor diet and greenhouse gas emissions from ruminant animals, especially cattle.
- The International Monetary Fund estimates that the \$7 trillion in "explicit" and "implicit subsidies" for fossil fuels (e.g., responding to pollution and greenhouse gas emissions) is seven-fold higher than market prices.
- The WHO estimates the economic costs of tobacco to be US\$1.4 trillion.
- Experts estimate the costs of <u>alcohol to the drinker and society at approximately US\$2.6 trillion</u>.

6. Joint-statement of CSOs calling for a UN code-of-conduct with COI safeguards, 2022-2023

A joint statement endorsed by 421 NGOs in 2022-2023 called for a Code of Conduct for engaging with civil society organizations as part of the NGO Committee's organizational review and submitted to the Secretary-General's Office. ¹⁸

Denmark and Costa Rica have, reportedly, consulted some selected ECOSOC-accredited CSOs on a draft manual concerning aspects engaging with civil society linked with a so-called "UNMute Civil Society," program. I have not seen a draft and the Danish mission confirmed that there are no specific plans for publishing the manual. It is not clear if it will recommend conflict-of-interest safeguards.

7. The Food and Agriculture Organization conflict of interest standards and reporting

The FAO published its *Strategy for Private Sector Engagement 2021-2025* which made repeated, specific references to institutional conflicts of interest and the need to protect against undue influence of food-related industries, but its 52-page *Annual Report on Private Sector Engagement, 2023* does not even mention the term or concept of conflicts-of-interest or undue industry influence. (I have attached a copy of correspondence with FAO leadership about this issue; in my view, their reply is not responsive to the questions posed.)

8. WHO definition and forthcoming guideline on the commercial determinants of health

The WHO is expected to soon publish guidance on the commercial determinants of health which it has provisionally defined, in part, as:

The private sector influences the social, physical and cultural environments through business actions and societal engagements; for example, supply chains, labour conditions, product design and packaging, research funding, lobbying, preference shaping and others.

Commercial determinants of health impact a wide range of risk factors, including smoking, air pollution, alcohol use, obesity and physical inactivity, and health outcomes, such as non-communicable diseases, communicable diseases and epidemics, injuries on roads and from weapons, violence, and mental health conditions. 19

I hope this helps relay the basis for wide concern about conflicts-of-interest in UN deliberations and the unrealized promise of implementing safeguards.

Respectfully submitted,

Bill Jeffery, BA, LLB of the Ontario Canada Bar

Centre for Health Science and Law

Endnotes

¹ UN Secretary-General. Review of mechanisms and policies addressing conflict of interest in the United Nations System: note / by the Secretary-General. New York: UNSG, 2018. Available at: https://digitallibrary.un.org/record/1636850?ln=en&v=pdf citing Rajab M. Sukayri "Review of mechanisms and policies addressing conflict of interest in the United Nations system." Geneva: UN Joint Inspection Unit, 2017 at para. 17. Document reference: JIU/REP/2017/9. Available at: https://docs.un.org/en/JIU/REP/2017/9

- ² As I mentioned, the recent annual reports of the UN Ethics Office after 2016 had been offline; however, I was able to find the 2020 report available elsewhere and, eventually, discovered that subsequent reports are available via the Wayback Machine Internet Archive (from the June 3, 2025 backup) at: https://web.archive.org/web/20240906073121/https://documents.un.org/doc/undoc/gen/n24/120/67/pdf/n2412067.p df And the official, the Ethics Office repaired the current links after I notified them of apparent coding error https://www.un.org/en/ethics/overview/documents-resources.shtml That is to say, it appears to have been a coding glitch. https://www.un.org/en/ethics/overview/documents-resources.shtml
- ³ UN General Assembly. Activities of the Ethics Office Report of the Secretary-General. Seventy-sixth session for the 2019 year. Human resources management. A/75/82. New York: UNGA, 2020. Available at: https://docs.un.org/en/A/75/82
- ⁴ UN General Assembly. Activities of the Ethics Office Report of the Secretary-General. Seventy-sixth session for the 2020 year. Human resources management. A/76/76. New York: UNGA, 2021. Available at: https://docs.un.org/en/A/76/76
- ⁵ UN General Assembly. Activities of the Ethics Office Report of the Secretary-General. Seventy-seventh session for the 2021 year. Human resources management. A/77/75. New York: UNGA, 2022. Available at: https://docs.un.org/en/A/77/75
- ⁶ UN General Assembly. Activities of the Ethics Office Report of the Secretary-General. Seventy-eighth session. Human resources management. A/78/91 New York: UNGA, 2023. Available at: https://docs.un.org/en/A/78/91
- ⁷ UN General Assembly. Activities of the Ethics Office Report of the Secretary-General for the year 2023. Seventy-ninth session Item 145 of the preliminary list* Human resources management. A/79/76 New York: UNGA, 2024. Available at: https://docs.un.org/en/A/79/76
- ⁸ UN Human Rights Council. Updated draft legally binding instrument to regulate, in international human rights law, the activities of transnational corporations and other business enterprises. As of July 4, 2025. Available at: https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/igwg-transcorp/session10/igwg-10th-updated-draft-lbi-with-proposals.pdf
- ⁹ UN General Assembly. Zero draft. Political declaration of the fourth high-level meeting of the General Assembly on the prevention and control of noncommunicable diseases and the promotion of mental health and well-being Equity and integration: transforming lives and livelihoods though leadership and action on noncommunicable diseases and the promotion of mental health and well-being. UN: New York: May 2025. Available at: https://www.un.org/pga/wp-content/uploads/sites/109/2025/05/Zero-Draft-PD-on-NCDs-and-Mental-Health-13-May.pdf
- ¹⁰ Centre for Health Science and Law and 144 co-endorsers. Ensuring the Primacy of the Right to Health, Prevention, and Conflict-of-Interest Safeguards at the 4th United Nations High-Level Meeting on the Prevention and Control of Non-Communicable Diseases United Nations Headquarters, New York, September 2025. Available at: https://tinyurl.com/2025-NCD-joint-statement
- ¹¹ Political Declaration of the High-Level Meeting of the General Assembly on the Prevention and Control of Non-Communicable Diseases: draft resolution / submitted by the President of the General Assembly UN. General Assembly (66th sess.: 2011-2012). President; UN. General Assembly. High-Level Meeting of Heads of State and Government on the Prevention and Control of Noncommunicable Diseases 2011. Available at: UN. General Assembly (66th sess.: 2011-2012). President
- ¹² United Nations General Assembly. Outcome document of the high-level meeting of the General Assembly on the comprehensive review and assessment of the progress achieved in the prevention and control of non-communicable diseases. Res A68/300. Available at: https://cdn.who.int/media/docs/default-source/ncds/governance/a-res-68-300.pdf?sfvrsn=e9a0e628 7

- ¹⁵ Conflict of Interest Coalition. Call for reaffirmation of the 2011 Political Declaration and effective safeguards against conflicts of interest. (Ottawa/New York: COIC, 2014). Available at: http://healthscienceandlaw.ca/wp-content/uploads/2016/10/UN.Conflict-of-interest-safeguards.Health-trump-trade.July2014.pdf
- ¹⁶ Conflict of Interest Coalition. Open Letter to the United Nations endorsed by 50 groups and experts representing more than 1,300 organizations worldwide. Ottawa/New York: COIC, 2018. Available at: http://healthscienceandlaw.ca/wp-content/uploads/2018/10/4-page.Open-Letter.pdf
- ¹⁷ Centre for Health Science and Law. United Nations Summit of the Future Ensuring the primacy of human rights and effective accountability to achieve the Sustainable Development Goals, New York Sept 22-23, 2024. Available at: https://tinyurl.com/2025-NCD-joint-statement
- ¹⁸ Centre for Health Science and Law. Letter to the Secretary-General. Consultations of the Committee on Non-governmental Organizations with civil society organizations in consultative status with ECOSOC regarding the evolving relationship between the NGOs and the United Nations: proposal for a code of conduct for engaging with non-state actors. Originally dated December 13, 2022, subject to subsequent endorsements by 421 organizations. New York: CHSL, 2022-2023. Available at: https://tinyurl.com/Proposal-for-UN-CodeOfConduct
- ¹⁹ World Health Organization. Commercial determinants of health. Fact Sheet. Geneva: WHO, 21 March 2023. Available at: https://www.who.int/news-room/fact-sheets/detail/commercial-determinants-of-health

¹³ Political declaration of the 3rd High-Level Meeting of the General Assembly on the Prevention and Control of Non-Communicable Diseases: resolution / adopted by the General Assembly UN. General Assembly (73rd sess.: 2018-2019); UN. General Assembly. High-Level Meeting of Heads of State and Government on the Prevention and Control of Noncommunicable Diseases (2018: New York, 2018). Available at: https://digitallibrary.un.org/record/1648984?ln=en&v=pdf

¹⁴ Conflict of Interest Coalition. Statement of Concern at the United Nations High Level Meeting on the Prevention and Control of Non-communicable Diseases. New York: COIC, 2011. Available at: http://healthscienceandlaw.ca/wp-content/uploads/2016/10/ConflictOfInterestCoaltion.Sept2011-2.pdf

C-ODG2024-002803 questions about the status and application of the Strategy for Private Sector Engagement 2021-2025



From PSU-Director < PSU-Director@fao.org>

To billjeffery@healthscienceandlaw.ca <billjeffery@healthscienceandlaw.ca>

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Date 2024-07-19 3:28 am

Mr Bill Jeffery
Executive Director
Centre for Health Science and Law
Ottawa, Canada

Dear Mr Jeffery,

Thank you for your email of 3 July 2024.

The private sector is a strategic ally in our mission, driving innovation, data sharing, and the scaling of collective efforts to deliver country-led solutions. FAO's engagement extends from Micro, Small, and Medium-sized Enterprises (MSMEs) to large multinationals, producers' organizations, industry trade associations, and financial institutions, all aiming for sustainable impact at scale. FAO is committed to enhancing its private sector engagement through strategic, proactive, and agile approaches.

The Organization's engagement with private sector partners is firmly rooted in the United Nations values. While FAO's due diligence process examines these elements more in detail, all partnerships adhere to the organization's principles for engagement, the FAO Exclusionary Areas and High-Risk Sectors in an Operational Context (Common Criteria) and the 10 Principles of the United Nations Global Compact. For further details, please refer to the Due Diligence Framework for Risk Assessment and Management of Engagements (FRAME), which is available in Annex 2 of PC 132/2.

Throughout 2023, FAO's <u>formal</u> and informal engagements have promoted adaptation, resilience, and inclusivity by advancing the agrifood systems agenda, fostering rural development, eradicating rural poverty, scaling up science, technology, and innovation to achieve the SDGs, facilitating increased and improved investment, and ensuring environmental sustainability, biodiversity integration, and the climate resilience of agrifood systems.

FAO aims to continue striving for transformative private sector partnerships to drive sustainable and inclusive agrifood systems, leveraging investments, advanced tools, and strategic outreach.

Yours sincerely,

Fatouma Seid

Deputy Director

Partnerships and UN Collaboration Division (PSU)

Partnerships | Family Farming - Parliamentary Networks - ComDev | Indigenous Peoples | UN Collaboration | Responsible Agricultural Investments - Learning - Agriculture Information Management



From: <u>billjeffery@healthscienceandlaw.ca</u> < <u>billjeffery@healthscienceandlaw.ca</u> >

Sent: Wednesday, July 3, 2024 1:32 AM

To: Director-General < <u>Director-General@fao.org</u>>

Subject: questions about the status and application of the Strategy for Private Sector Engagement 2021-20125

Dear Dr. Qu Dongyu,

It bears noting that we are only a few months away from the final year of the the <u>FAO Strategy for Private Sector Engagement 2021-2025</u> which indicated, in part, that:

Engagements should:

- 3. not compromise FAO's neutrality, impartiality, integrity, independence, credibility or reputation;
- 4. be effectively managed and avoid any conflicts of interest or other risks to FAO;
- 7. support and enhance, without compromise, the neutral and independent scientific and evidence based approach that underpins FAO's work;
- $8.\ protect\ FAO\ from\ any\ undue\ influence,\ especially\ on\ processes\ for\ setting\ and\ applying\ policies,\ norms\ and\ standards;\ [and]$
- 10. ...respecting the principles of..."do no harm".

And, importantly, the Strategy acknowledged that:

FAO's risk management framework for [Non-State Actors] is being developed separately, with modernized and streamlined due diligence and risk assessment procedures.

Among other aspects, the risks relate to:

- a. conflicts of interest;
- b. undue or improper influence exercised by a private sector entity on FAO's work, especially, but not limited to, policies, norms and standard-setting;
- c. a negative impact on FAO's integrity, independence, credibility, reputation or mandate;
- d. the engagement being primarily used to serve the interests of the private sector entity, with limited or no benefit to FAO;
- e. the engagement conferring an endorsement of the private sector entity's name, brand, product, views or activity;
- f. the blue-washing of a private sector entity's image through an engagement with FAO; and
- g. the failure of the partnership to provide the expected benefits.

And:

"FAO's due diligence framework is applicable for all [Non-State Actors], including the private sector, and is being updated separately. A list of different risk categories, such as reputation, blue-washing, political, legal and financial, as well as the identification of risk mitigating measures, will be part of the internal due diligence procedures."

However, the 52-page <u>Annual Report on Private Sector Engagement, 2023</u> does not mention the term or concept of conflicts-of-interest, as best I can tell, and the due diligence framework has not been published. Was there a public consultation on draft conflict-of-interest safeguards?

That *Annual Report* indicates that only 10% of formal engagements were relevant to the SDGs concerning the two largest negative externalities of food systems, ill-health (3%) and climate action (7%) even though *FAO's State of Food and Agriculture Report*, 2023 described those two negative aspects of foods systems as constituting the lion's share of negative externalities food and agriculture system, if the planet does not cool, the adverse climate impact could be catastrophic.

Please let me know the status of that guidance and whether there will be efforts to ensure that industry partnerships can address the biggest externalities?

Respectfully,

-Bill Jeffery

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