

## New Zealand comments on CFS draft policy recommendations on Agroecological and other Innovative Approaches for Sustainable Food Systems that ensure Food Security and Nutrition

Page	Paragraph or section	Comment
	General comment	<p>The corresponding HLPE report used to inform these policy recommendations highlighted the broad diversity of farming practices that can be used in different contexts in order to improve the sustainability of agriculture. In our view, this implies taking a pragmatic approach to assess which agricultural practices are beneficial under which condition, and with what trade-offs. The HLPE report resisted the call by others to define agroecology and agroecological practices. Rather, it highlighted that agricultural practices can be classified along a spectrum and qualified as more or less agroecological, depending on the extent to which agroecological principles are locally applied. In line with the approach taken in the HLPE report, the policy recommendations should provide a useful and comprehensive contribution to discussions on different pathways towards sustainable agriculture and food systems that enhance food security and nutrition.</p> <p>Given the lack of a single definition for agroecological practices in the HLPE report and this document, and the diversity of approaches available, we recommend removing reference to “agroecological practices” throughout the report, and instead referring simply to either “innovative approaches” or “sustainable agriculture approaches”, or similar language that does not privilege one approach over others.</p>
	General comment	<p>We query the need for references to ‘the right to food’ throughout the document. While recognising the ‘right to food’ is a fundamental guiding principle at the start of the document is appropriate given its linkages to food and nutrition security, it is our view that in the remainder of the document the concept is adequately covered by the use of the term ‘food and nutrition security’ and that inclusion of both terms in the document, often in the same sentence, creates unnecessary repetition.</p>
	General comment	<p>Recommendations concerning “digitalization” are made in several parts of the document, but it is not clear what is meant by this. We observe that this could mean a wide variety of different things and that the document and its recommendations would benefit from clarifying what specifically is being referred to here.</p>
	General comment	<p>Significant attention in the recommendations is directed to addressing issues of inequity in food systems. We would suggest that other ‘gaps’ are also worthy of being given the same degree of consideration if the CFS wishes to ensure its policy recommendations adequately capture the range of sustainability issues that relate to food systems. These include, for example, the environmental footprint of the food system, the potential for greater productivity/yields/sustainable intensification, and the ‘land gap’ or lack of available land for further food production.</p>

	General comment	Diversity in food production systems is promoted as a necessary prerequisite for a range of desired outcomes throughout the document. We do not think a clear case is made here for the range of positive impacts that farm diversity supposedly has for the environment, human health and other objectives, and that it would be better to not treat it as a silver bullet. In some circumstances, there are compelling reasons for specialisation rather than diversification for reasons that can include resource efficiency, comparative advantage, and land and climate suitability. We further suggest that the way in which foods are produced is a key determinant of their sustainability, and their impact on biodiversity and ecosystem services. The “transition” required is not always or exclusively about shifting from one food to another, but a transition from producing in a less sustainable to a more sustainable way, and towards greater transparency in order to be able to assure consumers of the various sustainability attributes of a product (e.g. GHG footprint, animal welfare, social sustainability dimensions etc.) to allow them a choice in safe, affordable, nutritious and sustainable food options.
2	4	In relation to the “numerous innovative approaches”, we suggest amending the language slightly to reflect that the list that follows provides some possible approaches, but is by no means exhaustive. Suggested new text: “Examples of approaches and technologies include, but are not limited to:”
4	10	This recommendation seems to promote agricultural subsidies, which we do not support. Distortions in agriculture markets work against efficiency, competitiveness and market incentives to move towards more sustainable production models over the longer term, negatively impacting food and nutrition security and, in some cases, trapping producers and economies into less sustainable models. Further refinement of the language in the recommendation may be helpful to clarify this point.
4	13	Suggest change to “Develop strategies to support transitions towards sustainable food systems that ensure food security and nutrition through <b>the spectrum of innovative approaches available</b> agroecological and other <del>innovative approaches</del> , including through the definition of long-term goals at national and regional levels, ensuring policy coherence across sectors, with the participation of public administrations and relevant stakeholders involved in agriculture, forestry, health, gender, education, finance, trade, energy and environment.” As recommended above, we suggest application of this change to other areas where agroecology is specifically mentioned. As the document notes in paragraph 4, there are “numerous innovative approaches” to enhance food systems sustainability, and these should be considered based on relevance and usefulness to a particular context. There are a myriad of approaches that countries/regions and individual farmers and growers can apply in different contexts and this should be emphasised.
4	17	We see no justification for the inclusion of this recommendation and suggest it is deleted.
5	Support transitions to diversified and resilient food	Currently, this section lacks recommendations that speak to the 1 <sup>st</sup> “operational principle” outlined on page 2, para 2: (i) improving resource efficiency. We therefore suggest this section should include a recommendation about the promotion of technologies and innovations to improve production efficiencies including agricultural intensification/productive and sustainable land use, enhanced nutritional qualities of food and reduced environmental impact.

	systems	
5	19	As written, this paragraph is very hard to follow and appears to be attempting to combine a number of different ideas using obscure language and jargon that we are pretty sure will not be easily understood by readers. We suggest the following replacement text: <b>Promote productive, resilient and animal welfare-conscious food systems that apply an ecosystem approach to food production in order to optimize synergies with the non-productive species within the system (including plants &amp; trees, aquatic species, pollinators) and the ecosystem services both within and flowing from the system (including supporting the natural processes within water, soil, and carbon).</b>
5	24	This recommendation draws the unsubstantiated conclusion that diversifying what is produced will lead to “sustainable diets”. We do not understand this implied causal link to be self-evident, and request for this claim to supported by some evidence.
5	27	Recommend phrase “short supply chains” is changed to “efficient supply chains” – in acknowledgement that shorter supply chains and buying local isn’t necessarily more sustainable, and innovative practices shouldn’t exclude trade. Focusing on transport-related impacts or “food miles” without regard to how the food was produced will give a misleading picture. For example, with regard to GHG emissions, transport is generally a small contributor to emissions across the life cycle of food products. For most food products, it accounts for less than 10%; for beef, transport typically accounts for less than 1% of emissions (see Poore and Nemecek, 2018; Weber and Matthews, 2008). In some cases eating locally can increase emissions. Many studies demonstrate that importing goods from countries where they are in-season often has a lower footprint than using energy-intensive production methods to produce them locally year-round and/or using refrigeration and other preservation methods to store them for several months (e.g. Hospido et al, 2009; Carlsson et al, 2003; Ledgard et al, 2011; Saunders et al, 2009, Ledgard et al, 2020).
5	28	In our view, there is a distinction between “maintaining diversity of species on farm” and “diversified food systems” that is not elucidated here. We would like to see clearer evidence and explanation for the central importance placed on diversified food systems here. While we agree that a diverse set of productive breeds is important, and so too are diversity and heterogeneity, we question if there is value in making a piece of productive land more diverse purely for the sake of it. Are our efforts not better placed in ensuring that productive land is 1) productive and resource efficient 2) resilient and 3) used in a way that has a neutral or positive effect on surrounding ecosystems and their biodiversity?
5	Section: Markets for sustainable food systems	Recommend inclusion of a paragraph in this section to expressly support the role of trade in sustainable food systems, along the lines of the following: “Promote open and inclusive trade as a method to support sustainable production and consumption and global food security and nutrition. Support the removal of trade- and production-distorting subsidies as a method to encourage investment in innovation towards the sustainable development of agriculture.”
5	Section: Sustainable healthy	We caution against conflating and oversimplifying the complex and multi-faceted issues such as the environmental sustainability of food choices, and the impact of food choices on human health. As the OECD notes, “the type

	diets	of policy interventions required to obtain one objective is unlikely to be the same as the type required to achieve other objectives. For example, the optimal diet for human health is unlikely to coincide exactly with the optimal diet for environmental sustainability, and vice versa.” New Zealand strongly supports the emphasis on the need for “a transition from a search for a global solution to an appreciation of the diversity of situations that require diverse solutions”. This position is consistent with the agroecology and other innovations HLPE report that acknowledged “the huge diversity of food systems across and within countries, and the diversity of the challenges and constraints they face, context-specific pathways towards sustainable food systems can be developed, and that these transition pathways may be grounded in different narratives, leading to different sets of options for how change is realized”. We urge that the above principles of developing context-specific pathways be applied to CFS thinking with regard to food production practices, diets, and actions and activities across different parts of food systems. We further suggest that “pathways” need to be evidence-based and scientifically sound.
6	30	We fully support the reference here to applying <b>system-wide assessment frameworks to assess the performance of food systems and their economic, social and environmental impacts</b> . In our view, holistic and integrated approaches to food systems issues are key to ensuring that co-benefits are optimised and trade-offs minimised. We note that indicators will be different at local/national level, but require universal comparison and scientific validity. We suggest the following insertion to emphasise the importance of taking context-specific factors into account, and of ensuring assessment frameworks are scientifically rigorous and evidence-based. We also suggest deleting the reference to the right to food, which is synonymous with food security and nutrition, and amounts to unnecessary repetition. “Apply system-wide assessment frameworks that <b>consider local/national contexts</b> to assess the performance of food systems and their economic, social and environmental impacts, including on food security and nutrition, <del>and the right to food</del> , <b>ensuring that practices are strongly evidence-based, addressing the full life cycle</b> while considering the following principles...”
6	32	Suggest the following insertion: “Assess the impacts of public incentives <b>[and agricultural subsidies]</b> on the sustainability of food systems and food security and nutrition for all.”
8	55	We question why this is considered to be the role of government? This looks like more of a role for civil society and the private sector and suggest it should be framed as such. Also recommend the following text change: “Strengthen food producers’ and consumers’ associations, organisations and cooperatives that build capacities, create and exchange knowledge to facilitate the adoption of agroecological <b>[evidence-based and context-specific]</b> approaches to foster transitions toward sustainable food systems.” Focusing on facilitating the adoption of only agroecological approaches raised the same issue as we have raised on a number of occasions above.