



**Comments on the CFS' Zero Draft**  
**“Policy Recommendations on Agroecological and Other Innovative Approaches**  
**for Sustainable Food Systems that Ensure Food Security and Nutrition”**  
**— From Pesticide Action Network International —**

25 March 2020

Dear Ambassador Emadi and the Committee on Food Security:

On behalf of PAN International<sup>1</sup> and the undersigned PAN national and regional organizations, I am pleased to contribute the following comments regarding the Zero Draft of “Policy Recommendations on Agroecological and Other Innovative Approaches for Sustainable Food Systems that Ensure Food Security and Nutrition.”

The Zero Draft begins by appropriately recognizing the 2030 Agenda for Sustainable Development’s call for “*bold and transformative steps... to shift the world onto a sustainable and resilient path*” and provides an important starting point for “*laying policy foundations for transforming food systems to ensure sustainability*” while offering a number of important concrete policy recommendations. This transformation of our food and agricultural systems is the highest priority, as humanity faces converging climate, biodiversity and food crises, and the unravelling of the ecosystem and planetary life support systems on which we all depend.

In key respects, however, the Zero Draft falls far short of providing meaningful policy recommendations to achieve the high-level policy shifts required to actually accomplish the *transformation* of our food systems that is so urgently needed, and to overcome the *structural obstacles* to such a transformation as presented in the HLPE report, “Agroecological and Other Innovative Approaches for Sustainable Food Systems that Ensure Food Security and Nutrition” (hereafter, “the HLPE Report”).

As such, the draft has not sufficiently incorporated the findings of the HLPE report, nor the written comments provided by many stakeholders — *including PAN International among many others* — from November 2019 through February 2020.

We appreciate the opportunity to provide the following overall comments and specific recommendations, and look forward to continued collaboration with you and the UN Committee on Food Security, throughout this policy convergence process.

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<sup>1</sup> PAN international is a global network of 600 organizations in 90 countries, with 5 regional centers in Africa, Asia & the Pacific, Europe, Latin America & the Caribbean and North America. Our members include peasant and family farmers, farmworkers, medical and public health professionals, scientists, representatives of sustainable agriculture, labor, environmental and consumer groups and social movements, and individuals concerned with the safety, sustainability, fairness, resilience and integrity of our food and farming systems.

## ***Overall Comments and Recommendations***

### **1. Food Systems Transformation**

**This Policy Recommendations document must clearly identify the necessary transformation of our food systems as a priority of the highest order, requiring decisive action to:**

- a) enable and facilitate transition towards sustainable, equitable and resilient food systems;
- b) overcome structural obstacles impeding system transformation by addressing power asymmetries and current lock-ins to dominant unsustainable systems; and
- c) guide policymakers in how best to fulfill their obligations to uphold the universal human right to food and other rights identified below.

The HLPE report—like many other high level UN and expert reports—concluded that a transformation of food systems is urgently needed. The Zero Draft fails to establish this overarching priority and should be revised accordingly.

### **2. Agroecology and agroecological approaches**

- a) **Revised Policy Recommendations should be grounded in the HLPE Report’s analysis, evidence and findings, and build on FAO’s seminal work in agroecology, in particular the “10 Elements of Agroecology,”** which have previously been agreed and adopted by the FAO Council and thus serve as a point of reference for member states already. The “10 Elements of Agroecology” were highlighted in the HLPE Report as a basis for the Report’s presentation of 13 Consolidated Principles.
- b) **Revised Policy Recommendations should clearly identify “agroecology and agroecological approaches” as the most robust pathway towards systems transformation,** which was a central finding of the HLPE report itself. Instead, the Zero Draft implies that choosing randomly from an undifferentiated list of “approaches and technologies” along a “spectrum of different pathways”, will somehow be sufficient. In reality, as shown by evidence presented throughout the HLPE report, not all “approaches and technologies” are created equal and not all will have beneficial impacts on food systems. Member states need clear guidance on how to establish coherent policy frameworks that will enable them to move swiftly and effectively towards agroecology and agroecological approaches. With finite resources and dwindling time to address global climate, biodiversity, energy, water, food security and health crises, the Zero Draft’s failure to provide this guidance is unacceptable.

The HLPE report found that “clear patterns emerge among the two major categories of approach,” namely — agroecological vs sustainable intensification approaches. **Agroecology specifically, along with agroecological approaches, was found to be the best-equipped approach to enable successful transition to equitable, sustainable and resilient food and agricultural systems,** with highly beneficial impacts ranging from regenerative production, support of biodiversity, economic diversification, climate adaptation and mitigation, knowledge generation and the human and social values of equity, connectivity, rights, democratization and participation (HLPE Report, Table 4, p. 63). Furthermore, agroecology and agroecological approaches “address not only ecological and health impacts of food systems, but also power asymmetries and socio-economic inequalities [and] as such, are embedded in a human rights-based framework.”

The HLPE report found that, in contrast, “sustainable intensification and related approaches” had few benefits to offer (Table 4). Indeed, some of these approaches have been found to *undermine progress* towards systems transformation by upholding the status quo, entrenching power asymmetries and continuing to privilege corporate profit over the health, environment and livelihoods of small-scale and peasant farmers, Indigenous and rural communities.

- c) Based upon the evidence presented in the HLPE report, **revised Policy Recommendations should recommend that policymakers and stakeholders at all levels work together to establish a coherent and coordinated policy framework, with specific policy measures to advance “agroecology and agroecological approaches” and prioritize transition pathways that will clearly support meaningful and continuous progress towards this end goal.**

### 3. Rights and Rights-based Frameworks

**Revised Policy Recommendations should clearly and firmly emphasize the obligations of states and international bodies to respect, protect and realize the universal Human Rights to Food, Water and Nutrition, to a Safe, Clean, Healthy and Sustainable Environment and to Safe and Healthy Working Conditions, as well as the rights of women, peasants and Indigenous peoples.**

- a) The Zero Draft correctly recognizes the importance of the *Right to Food*. However, the language in Para. 8 is far from adequate, merely suggesting that this right “can” serve to “guide efforts.” Such obligations to fulfill these rights *must* guide policy *decisions* and inform the development and implementation of rights-based policy frameworks around transitioning to sustainable food and agricultural systems. Furthermore, this right implies the right to food sovereignty, that is, the right of peoples to produce and access healthy and culturally appropriate food through ecologically sound and sustainable methods and to define their own food and agricultural systems, markets and institutional arrangements accordingly.
- b) Recommendations must also provide explicit guidance on rights-based policy frameworks and measures that will directly support member states’ policy alignment with and fulfillment of the obligations articulated within the *UN Declaration on the Rights of Indigenous Peoples* (UNDRIP), the *UN Convention on the Elimination of all Forms of Discrimination Against Women* (CEDAW), the *UN Declaration on the Rights of Peasants and Other People Working in Rural Areas* (UNDROP) and the *UN Decade of Family Farming*, as adopted by the UN General Assembly. This requires going beyond the Zero Draft’s statement that the recommendations “build upon and complement” these instruments and UN processes (Para. 9).
- c) Finally, such guidance must include attention to inclusive, safe and democratic decision-making processes, not only in terms of encouraging “local participation” but also in terms of *ensuring and guaranteeing protection of the rights, lives and livelihoods of peasant, Indigenous and family farmers and workers, including youth and women*, so that these key groups— who are on the frontlines of transforming their food systems into more equitable and sustainable ones— can engage meaningfully *and without risk of harm or loss of life, income or livelihood*, in policy and decisionmaking processes.

#### 4. Agency

**The principle of “agency” must be included in the revised recommendations, but is missing from the Zero Draft.** The HLPE Report identified **agency** as a “*fundamental tenet of transitions towards SFSs,*” further explaining that “achieving agency implies the need for all people to have access to accurate information and the *compliance of the right to food, as well as the ability to secure their rights over the resources* required for production, harvesting and preparation of foods” (HLPE Report, p. 110; emphasis added). As such, to be consistent with recommendation 1 (d) of the HLPE Report (p. 21), the principle of “agency” must be re-introduced.

#### 5. Ecological Footprint

**The concept of “ecological footprint” must be included in the revised recommendations.** The HLPE Report specifically called for inclusion of the “ecological footprint” as a key 4<sup>th</sup> operational principle for SFSs (HLPE Report, Rec. 1 (c), p. 21), noting that evaluating “the change in footprint [over time] shows whether a system is improving or degrading over time and, therefore, how transitions are performing” (HLPE Report, p. 65). The ecological footprint provides an extremely useful method for assessing agroecosystem resilience, adaptiveness to climate change and the sustainability of and tradeoffs between various innovative approaches and systems, enabling more accurate, evidence-based decision-making when choosing transition pathways.

#### 6. Agrochemicals & purchased inputs

**Revised policy recommendations should call for a coherent and coordinated policy approach to reduce and eliminate dependency on agrochemicals and establish agroecological approaches to pest, soil and crop management.**

- a) Such an approach would be in line with the analysis of the HLPE Report, which presented principles for transition towards SFSs for FSN that suggested policies to *a) eliminate dependency on purchased inputs, b) remove subsidies for synthetic chemical inputs* and *c) redirect investments and incentives towards innovative agroecological approaches*. These concrete policy measures from the HLPE report should be integrated into the revised policy recommendations.
- b) In contrast, the Zero Draft presents a misguided focus on “optimizing” agrochemical use and promotes systems that merely “reduce over-usage.” The appearance of such language in the Zero Draft is particularly strange, given that such recommendations have no basis in the HLPE Report’s conclusions. Indeed, the HLPE Report provided a critical assessment of these types of “use efficiency” arguments that fail to account for the ecological footprint or other economic, environmental and social costs (“externalities”) associated with a given approach.
- c) **Policy recommendations that prioritize the establishment of agroecological pest management and reduction of reliance on purchased chemical inputs** would also be consistent with existing international agreements, including the FAO Council’s 2006 recommendations to undertake the progressive banning of Highly Hazardous Pesticides (HHPs), the Conference of the Parties to the Stockholm Convention on Persistent Organic Pollutants and the International Conference on Chemicals Management.<sup>2</sup>

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<sup>2</sup> The Conference of the Parties to the Stockholm Convention on Persistent Organic Pollutants agreed in

## **Additional points on specific paragraphs in the Zero Draft follow.**

### ***Preamble (Para 1-10)***

- **Para 1:** This contains important context and appropriately references global calls for “bold and transformative steps.” The call, however, should also reference the same high level finding in the HLPE Report itself, which emphasized that a transformation of our food systems is necessary.
- **Para 2:** The paragraph should eliminate reference to a “continuum” of “three broad food system types”, an incorrect conceptualization that is not based in the HLPE report nor in empirical evidence from the ground. In reality, a tremendous heterogeneity of food systems exists, each with unique characteristics—shaped not only by biophysical and climate conditions, but also by farmers’ knowledge, culture and local context. These systems are neither situated along a “continuum” nor served by being categorized into one of three artificially-determined boxes. The phrase “all food systems have the potential to contribute...” is misleading and unhelpful, as it obscures rather than clarifies the significant differences in existing food systems’ abilities to contribute to SFSs for FSN.

Instead, stronger language is required, highlighting the need for countries to embark on transition pathways that *will* ultimately enable them to address converging climate, biodiversity, health and food system crises and reach the end goal, rather than potentially stalling after implementing a few incremental tweaks to a system that remains inherently unsustainable. “Ecological footprint” should be included here as a fourth operational principle, as per the HLPE report and as explained above.

- **Para 3:** The HLPE Report provides a sophisticated understanding of “innovation” that is not reflected in this paragraph of the Zero Draft. The generic focus here on undifferentiated innovative approaches, as if any and all provide solutions to food system transformation, misses a central purpose of the HLPE Report, which was to *assess agroecological* innovative approaches (first) as well as *other* innovative approaches (secondarily) in terms of their ability to *contribute to SFSs for FSN*.

The Report presents evidence that not all innovative approaches are equal (or even beneficial), noting that “many technological innovations in agriculture have generated significant negative externalities,” that “distributional aspects of risks and benefits from innovation” exist, and that some innovation policies “may be in fundamental conflict with democratizing and empowering farmers and their communities.”

At the same time, the Report recognizes the oft-ignored role of farmers in innovation and notes that locally-generated innovations and institutional innovations—including new relationships, horizontal collaborations and arrangements that support and facilitate farmers’ discovery and validation of their own knowledge, scientific practice and development of technologies appropriate to their social, cultural, economic and local environmental contexts, offer important innovative approaches to SFSs for FSN.

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2013 that priority should be given to ecosystem-based approaches to pest management when phasing out chemical pesticides such as endosulfan. Similarly, FAO’s 2016 *Guidelines for Highly Hazardous Pesticides (HHPs)* states: “In 2015, the SAICM International Conference on Chemicals Management [ICCM] adopted a resolution that recognized HHPs as an issue of concern and called for concerted action to address HHPs, with ***emphasis on promoting agro-ecologically based alternatives...***” (emphasis added).

**Para. 3 should be entirely revised to reflect this more nuanced understanding of innovation. It must also include “agency” as the fifth pillar of FSN.**

- **Para. 4 & 5:** The language here fails to distinguish between the two major categories of approaches and provides no guidance to assist policymakers in assessing the widely varying outcomes associated with the “laundry list” of approaches and technologies supplied in the Zero Draft (see *Overall Comment #2* above). Para. 4 should be deleted in its entirety and replaced with an entirely new paragraph presenting the substantial differences between transformational “agroecology and agroecological approaches” and “SI or incremental approaches.” Para 5 does not offer much meaningful guidance.
- **Para. 6:** The Zero Draft’s presentation of digitalization as “among the most critical and far-reaching innovative approaches” has no basis in the actual findings of the HLPE Report. Digitalization is not, in fact, an “innovative approach,” according to the HLPE Report, but a collection of technologies, any one of which may have positive or negative impacts on SFSs for FSN depending on the context and dynamics of access, use and control. As an interesting emerging set of technologies, the potential impacts of digital technologies warrants further investigation and assessment, centering the voice, perspective and consideration of small-scale and peasant farmers, workers and Indigenous communities, among others. However, the over-emphasis of digitalization in *this* particular policy document that should be focused instead on agroecological and other innovative approaches for SFSs for FSN is inappropriate.
- **Para 8:** Indeed, key among national and international obligations is the right to food. This point requires much stronger language, however, as described in *Overall Comment #3* above, and should not be buried so far down in the “preamble” section.

### ***Policy Recommendations (Para 11-57)***

#### ***Sec I: Lay policy foundations for transforming food systems***

- Given that this section aims to provide policy recommendations for food system *transformation*, and given that the HLPE Report firmly identified “agroecology and agroecological approaches” as *the uniquely transformative* set of approaches, this entire section should be revised to offer concrete policy measures to establish agroecology as the transformative path towards SFSs for FSN.
- Instead, many of the Zero Draft’s recommendations provide generic suggestions about “supporting sustainable food systems” through “agroecological and other innovative approaches” that make no distinction between approaches, and thus provide no clarity whatsoever regarding meaningful next steps.
- PAN and numerous other actors<sup>3</sup> have already provided the CFS with many *concrete and detailed policy recommendations* for how policymakers can establish agroecology and agroecological approaches to transform food systems towards SFSs for FSN, as well as policy measures to overcome obstacles to such transformation. We find that our prior

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<sup>3</sup> See comments submitted to the CFS in November and December 2019 by, for example, IATP, IPES-Food, North American-based Scientists, and governments of Brazil, France, Germany, Hungary, Spain and Switzerland.

recommendations are not well reflected in this Zero Draft. **We have appended a copy of those recommendations and request you to include them in the revised draft.**

## ***Sec II: Support transitions to diversified and resilient food systems***

- **Para 19:** We agree with this important recommendation to promote diversified and resilient agroecosystems. To this should be added the imperative to ensure small-scale and peasant farmers have secure access to land and water to enable them to establish the long-term land management practices necessary in maintaining or regenerating healthy soil and diversified resilient agroecosystems that have the ability to mitigate and adapt to climate change.
- **Para 20:** We agree with the recommendation to strengthen and enforce regulations to reduce dependence on and use of agrochemicals to protect and improve human and environmental health. However, we disagree with the Zero Draft's emphasis on "optimizing" agrochemical use, as that is inconsistent with the HLPE report's findings, particularly in the context of a section focused on "the conservation and sustainable use of biodiversity."

The HLPE Report noted that "sustainable intensification" often includes a focus on optimizing use of external inputs. However, the Report also critiqued too much emphasis on resource efficiency, noting that "resource-efficient processes can still be degradative." In contrast, the Report found that a wide range of agroecological approaches focus not on chemical inputs, but instead on "optimizing *biological processes and ecosystem functions*", "optimizing the *use of local renewable resources and minimizing negative externalities*" and "*closing resource cycles of nutrients and biomass.*" The Zero Draft's singular emphasis on *agrochemical* optimization in Para 20 is thus unjustified, as it is unsupported by the HLPE report. Particularly in light of the continued implication of chemical pesticide use as a factor in global biodiversity losses,<sup>4</sup> the Zero Draft's mention of optimizing agrochemical use should be eliminated.

**We propose to replace Para 20 with the following recommendation**, which provides clearer guidance to policymakers and would be more consistent with the HLPE report's findings and the subsection's focus on biodiversity:

Establish a coordinated policy approach to ecological crop, soil and pest management that conserves biodiversity, ecosystem and community health. Emphasize knowledge generation through horizontal farmer-scientist collaboration in research, extension and education programs to develop and strengthen least-toxic community-based, ecological management approaches. In accordance with the UN FAO's principles of Integrated Pest Management, prioritize ecological alternatives to reliance on synthetic chemical pesticides, including farm and landscape management measures aimed at preventing pest outbreaks by establishing healthy crops within biodiversified, resilient systems, maintaining soil health (fertility, biological activity, structure, etc.) and preserving ecosystem services and natural habitats to augment the population of beneficial organisms.

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<sup>4</sup> Sanches-Bayo, F. and K. Wyckhuys, 2019. "[Worldwide decline of entomofauna](https://doi.org/10.1016/j.biocon.2019.01.020)" Biol Conservation Volume 232, April 2019, Pp 8-27. Accessed at <https://doi.org/10.1016/j.biocon.2019.01.020>. Hallmann, C.A. et al., 2017. "More than 75 percent decline over 27 years in total flying insect biomass in protected areas." PLOS One. October 18, 2017. Accessed at <https://doi.org/10.1371/journal.pone.0185809>

This language integrates core principles and values identified throughout the report, such as regenerative production, recycling, biodiversity, and the human and social values of inclusivity, knowledge generation, connectivity, democratization and participation.

- **Paras 20-28:** We agree with the important recommendations in **Paras 20-26** to uphold farmers' rights, encourage sustainable consumption patterns, support circular economies, reduce food loss and waste, promote sustainable healthy diets that respect local context, culture and sovereignty, and establish public procurement policies based on locally and sustainably produced food. However, public procurement is not only a policy approach for sustainable healthy diets, but should also be identified in **Paras 27-28**, as one among other necessary measures to strengthen local markets.

***Section IV. Strengthen support for research, training and education; reconfigure knowledge generation; foster co-learning.***

- We appreciate the attention to transdisciplinary science, participatory action research for co-learning, horizontal sharing, integrating scientific knowledge with local, traditional and Indigenous knowledge and addressing power imbalances and conflicts of interest that is reflected throughout this section, particularly in the subsections for “Transdisciplinary research” and “Co-learning for Innovation.”
- An additional paragraph should address states' obligations to respect and protect the rights of Indigenous peoples, small-scale farmers and local communities in controlling their traditional knowledge, practices and innovations, as well as the local and Indigenous seeds that represent millenia worth of ancestral knowledge and practice.
- The subsections for “Capacity development” and “Investment in research, training and education” should be strengthened by explicitly prioritizing attention to agroecology and agroecological approaches, rather than reverting to the catch-all phrase, “agroecological and other innovative approaches” which, in the end, by including everything without differentiation, becomes meaningless.

**We proposed the following recommendations to more accurately reflect the HLPE report's conclusions in this sub-section:**

- Build local, national and regional capacity in agroecological research, extension and innovation.
- Encourage farmer-to-farmer learning and horizontal collaboration among farmers, Indigenous peoples and scientists in problem-identification, experimentation and innovation to strengthen research and extension capacity in agroecology.
- Prioritise participatory research and farmer-led innovation in agroecological practices that reduce reliance on agrochemical inputs, support adaptation to and mitigation of climate change, and integrate locally adapted seeds, cultivars and animal breeds.

**Section V. Strengthen stakeholder engagement, empower vulnerable and marginalized groups and address power inequalities in food systems.**

- This section is critical as it directs attention to the key underlying obstacles to SFSs for FSN: the inequitable power dynamics at the root of poverty and hunger the world over. We appreciate the attention to “ensuring the participation of rights holders” and the recognition of smallholder, peasant, Indigenous, family farmers, women and youth as “central agents” in transitions to SFSs for FSN, “including through the progressive realization of the right to food.”
- However, vague terms in the Zero Draft such as “support,” “promote,” “assess,” “ensure participation” and “ensure attention to” should be replaced with explicit language presenting concrete policy measures that can actually accomplish the goal of addressing the power inequalities and imbalances identified in the Report. Furthermore, realization of the right to food must be identified as an *immediate* goal of member states and international bodies, with priority attention directed to fulfilling people’s rights to self-determination and food sovereignty.

**We propose the following recommendations to better satisfy the need for concrete measures in this section:**

- Strengthen the capacity of farmers, Indigenous people, especially women and youth, and their organizations, to develop and adapt agroecology to meet their priorities, particularly for food, land, seeds, water, health, livelihood, self-determination and the right to organise.
- Bring women, youth, farmer and Indigenous leaders into national, regional and international decision-making processes.
- Implement comprehensive agrarian reform that ensures equitable and secure access to and control over productive resources (e.g. seeds, land, water, forests, fisheries and other natural assets) by peasant and small-scale farmers and Indigenous peoples.
- Revise intellectual property laws and regulations that violate peasant, Indigenous and rural communities’ rights as elaborated in the International Treaty on the Rights of Peasants and Other People Working in Rural Areas and establish and enforce legal frameworks to uphold farmers’ rights to save, develop and exchange seed, and disallow land, genetic and water grabs by corporations.
- Promote, protect and strengthen local markets and locally-owned and managed cooperatives in the hands of farmers.
- Establish equitable local, regional and global trade arrangements that enable farmers to meet food and livelihood security needs, support consumers’ access to fresh, local, healthy food and build relationships between producers and consumers in local markets.
- Manage the private sector to ensure alignment with equitable and sustainable development goals: reward private investment in safe, sustainable products and technologies; implement and enforce anti-trust and competition regulations to reverse current trends in agribusiness consolidation of market share.
- Establish, expand and enforce anti-trust legislation and establish a global governance structure to reverse current trends in corporate consolidation in the food and agricultural sectors; initiate an intergovernmental process to establish an international treaty on competition.

### ***Next Steps (Paras 58-68)***

- We encourage CFS to take a more proactive role in supporting national governments in undertaking meaningful policy shifts towards food system transformation, as identified in the HLPE Report and, upon revision, in this Policy Recommendations Document. A “special event” (Para. 61) could be nice, but a more consistent ongoing approach would be more beneficial, including South-South exchanges not only between government officials but also bringing government officials to the field to learn from farmers, fishers, Indigenous peoples and workers who are successfully implementing agroecology and agroecological approaches at local and regional levels.
- Para 63: The question of how trade agreements can support (rather than undermine) transitions to sustainable food systems is an important one. We strongly disagree with the Zero Draft’s proposal to invite the WTO to co-organize a dialogue during the next CFS plenary. The WTO lacks expertise in sustainable and equitable food systems and would not be an appropriate co-organizer of such a dialogue or panel. Rather, we propose that the CFS invite the UN Conference on Trade and Development (UNCTAD), and the UN Special Rapporteur on the Right to Food to co-organize this event with the CFS.
- We urge FAO to publicly reaffirm its institution-wide commitment to agroecology, building on the tremendous accomplishments, knowledge and expertise in agroecology garnered over the years, and to redouble its efforts to scale-out agroecology, investing in institutional expertise by hiring agroecological scientists, continuing to build on the momentum generated by global and regional symposia on agroecology, and integrating agroecological approaches across all relevant FAO departments and divisions.
- We also urge FAO to provide clear policy guidelines and technical and institutional support to member states in establishing their own national coordinated frameworks spanning relevant ministries and agencies with policies to support country-wide transitions towards agroecology, with particular attention to farmers’ rights and secure access to seeds, land, water, forests, fisheries and other natural resources, trade, markets, research, extension and education, within a rights-based framework.

On behalf of PAN International and the PAN member organizations listed on the following page, I would like to thank you for the opportunity to provide these comments. We look forward to seeing the revised policy recommendations in the days ahead.

Sincerely,



Marcia J. Ishii-Eiteman, PhD  
Senior Scientist, PAN North America  
Chair, PAN International Agroecology Workgroup

*On behalf of:*

Pesticide Action Network International

*and the following PAN national and regional organizations:*

Pesticide Action Network Africa

Pesticide Action Network Aotearoa (New Zealand)

Pesticide Action Network Asia & the Pacific

Pesticide Action Network Europe

Pesticide Action Network Germany

Pesticide Action Network India

Pesticide Action Network North America

Pesticide Action Network United Kingdom

Red de Acción en Plaguicidas y sus Alternativas en México (RAPAM)/ PAN Mexico

Red de Acción en Plaguicidas y sus Alternativas de América Latina (RAP-AL)

Red de Acción en Plaguicidas y sus Alternativas de América Latina - Chile

Red de Acción en Plaguicidas y sus Alternativas de América Latina – Uruguay

Organisation Benoise pour la Promotion de l'Agriculture Biologique (OBEPAP) – Benin

Public Eye - Switzerland

**Pesticide Action Network contributions to the CFS policy convergence process**  
regarding the HLPE report, “*Agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition*”

27 November 2019

On behalf of PAN International, I am pleased to contribute the following comments, in response to the 12 November 2019 request from Ambassador Mohammad Hossein Emadi, Rapporteur for the Policy Convergence Process for the HLPE report, “*Agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition.*”

Amb. Emadi has requested inputs by 29 November, including responses to five questions. Due to the limited timeframe in which to reply, we have focused our response on Question #3 and provide the following “high-level” recommendations for policy shifts needed to (a) overcome lock-ins and obstacles *preventing* country shifts towards least-toxic, climate-resilient, ecological farming as well as (b) concrete actions to *support* a system-wide transition to agroecology.

Our contributions focus on policies to enable a transition towards *agroecology* specifically because, according to the HLPE report, among all the innovative approaches examined by the HLPE report, **it is *agroecology* that offers the most transformative approach to achieving sustainable agriculture and food systems for food security and nutrition.**

In addition, as concluded in the HLPE report and as affirmed by the UN Special Rapporteur on the Right to Food, **agroecology is the approach that is most clearly aligned with the rights-based approach to food systems change.** Of grave concern is the evidence that a number of the so-called “incrementalist” approaches reviewed by the HLPE (e.g. sustainable intensification, climate-smart agriculture, biotechnology, etc.) are not only far less effective in achieving sustainable agriculture and food system goals, but may actually *undermine* urgently needed progress towards food systems change, by cementing institutional and system lock-ins and dependencies on the input-intensive, industrial-scale, low-diversity production systems that are dominant in many countries today, due in large part to the political and economic influence of the corporations that stand to gain the most from continued reliance on these systems and their associated inputs and technologies.

We therefore urge the CFS, in its deliberations, to prioritize the policies, research and extension, market shifts and investment decisions that are most likely to enable a rapid and effective systems-wide transition towards *agroecology*, and well as policy measures to tackle the lock-ins and obstacles to transformation.

Finally, I have included an additional 19-page document detailing a number of specific policy initiatives from a range of countries around the world, designed to support transition away from reliance on hazardous pesticides and towards organic and agroecological farming instead. This document is appended, following the “high-level” recommendations from PAN International below.

We would be happy to provide more detailed contributions at a future date.

Sincerely,



Marcia Ishii-Eiteman, PhD  
Senior Scientist & Grassroots Science Director, Pesticide Action Network North America  
Chair, PAN International Working Group on Agroecology



## Recommendations to the UN Committee on Food Security (CFS)

Pesticide Action Network International\*

November 2019

*\*PAN International (PAN) is a global network of 600 organizations in 90 countries, with 5 regional centers in Africa, Asia & the Pacific, Europe, Latin America & the Caribbean and North America.*

**Transitioning towards sustainable agriculture and food systems in the 21<sup>st</sup> century requires a decisive shift of institutional and policy support towards agroecology.** This is the implicit finding of the HLPE report, which recognized agroecology as the only truly transformative approach towards sustainable agriculture and food systems that enhance food security and nutrition.

This finding is made all the more urgent by mounting evidence that reliance on hazardous pesticides continues to erode agricultural system resilience in the face of climate change, weakens and harms the health, lives and livelihoods of communities around the world, and threatens biodiversity, putting entire taxa (insects, amphibians, birds), vulnerable ecosystems and the ecosystem services on which we depend, at risk.

In light of these findings, PAN strongly recommends that the Policy Convergence Process:

- **support the establishment of strong and enforceable regulatory frameworks to reverse the damaging effects of chemical-intensive, resource-extractive agriculture, and**
- **garner concrete global and national commitments by UN agencies and governments to support the transition towards agroecology, as described below.**

Concrete policy actions to support a transition to agroecology include:

### **Build local, national and regional capacity in agroecological research, extension and innovation**

- Encourage farmer-to-farmer learning and horizontal collaboration among farmers, Indigenous peoples and scientists in problem-identification, experimentation and innovation to strengthen capacity in agroecology.
- Prioritise participatory research and farmer-led innovation in agroecological practices that reduce reliance on HHPs, support adaptation to and mitigation of climate change, and integrate locally adapted seeds, cultivars and livestock breeds.

### **Support small and medium scale farmers and their organizations**

- Strengthen women's, farmers', Indigenous and community-based organizations' capacity to develop and adapt agroecology to meet their priorities, particularly for food, land, seeds, water, health, livelihood, self-determination and the right to organise.
- Bring women, farmer and Indigenous leaders into national, regional and international decision-making processes.

### **Establish supportive economic policies, financial incentives and market opportunities**

- Provide financial incentives and supports (credit, crop insurance, payment for ecosystem services) and expand market opportunities for farmers adopting agroecological practices.
- Remove perverse incentives (e.g. government subsidies for chemical inputs) that favour continued dependence on hazardous inputs and industrial-scale monocropping.
- In accord with the Polluter Pays Principle, establish independent funding mechanisms to support widespread adoption of agroecology, funded in part by contributions from polluting industries, e.g. agrochemical companies.

### **Strengthen institutional supports**

- Implement comprehensive agrarian reform that ensures equitable and secure access to, control over and ownership of productive resources by peasant and small-scale farmers and Indigenous peoples, revise intellectual property rights to uphold farmers' rights to save, breed and exchange seed, and disallow land, genetic and water grabs by corporations.
- Establish equitable local, regional and global trade arrangements that enable farmers to meet food and livelihood security needs and build relationships between producers and consumers in local markets.
- Manage the private sector to ensure alignment with equitable and sustainable development goals: reward private investment in safe, sustainable products and technologies; implement and enforce anti-trust and competition regulations to reverse current trends in agribusiness consolidation of market share.
- Evaluate and internalise the social, health and environmental costs of input-intensive production systems, to assist implementation of agroecology.

### **Establish global policy mechanisms to phase out and replace hazardous pesticides with agroecology**

- Establish a global legally binding treaty for the life-cycle management of pesticides, including the replacement of highly hazardous pesticides (HHPs) with agroecology.
- Encourage participating and member states of SAICM, FAO, UNEP, UNDP and GEF to promote, take action on and fund the replacement of HHPs and chemical-intensive farming with agroecology.