

## CFS Policy Convergence Process on Sustainable Agricultural Development and Livestock

### Comments from European Union

#### General Comments

First of all we would like to reiterate the EU's appreciation for the work of the HLPE (and the supporting work of the CFS Secretariat) in producing this report which we have welcomed and commended.

In connection to the HLPE report we would like to reiterate two issues. First, the HLPE Report speaks about an estimated (FAO 2012) figure of *60% increase in food production*. This figure is disputable, partly because it ignores consequences of reaching SDGs, in particular SDG 12.3 to decrease food losses and waste: *'By 2030, halve per capita global food waste at the retail and consumer levels and reduce food losses along production and supply chains, including post-harvest losses'*. In this sense it is preferable not to mention specific figures on food requirements, but use instead general wording, e.g. the one used by the CFS Smallholders recommendation in May this year.

Second, the HLPE report pays too little attention to pulses and their benefits, including the impacts on the animal husbandry sector:

- Pulses play an important role in nutrition. As a valuable protein source, they can partly substitute animal protein. This could have a moderating impact on the increase of the need for animal protein.
- Agronomic benefits of pulses (by inter-cropping, crop rotation, green manure, organic content of by-products, etc.) have a positive impact on soils, on biodiversity, on environmental sustainability and consequently on the assessed demand for animal feed production and supply.
- Some of the pulses themselves or their by-products are or could be important providers of high protein feed for animals.

We would now like to look forward to working with our esteemed rapporteur and all stakeholders in zoning in on the recommendations as we look towards the policy convergence process.

#### **1. Consolidate the Recommendations**

With this in mind we feel that we are obliged to reduce the number of individual recommendations (we currently have 48) so that they can be more practical and more accessible for users. We should consider focusing on SAD, putting special attention to livestock sector, and on recommendations that are additional to those recommendations already contained within previous CFS products. Therefore we think that that 14 different sections are too much; so we suggest merging some of them, as for instance sections 1, 2, 3 and 5.

Some of the recommendations are too long and confusing (i.e., 1.a, 2.a). We would rather favour concise and clear recommendations with a very concrete focus.

Some of the concepts/wording used throughout the document are also confusing and should be further clarified, as for instance in recommendations 7.d), e) and f).

Moreover, where the term agriculture is used, careful editing is necessary to ensure that it is clear to the reader whether livestock, fisheries and/or forestry are included or excluded.

## **2. *Protecting Natural Resources and Considering the Employment Merits of Livestock Farming***

The three principles that shape the pathways towards SAD (resource efficiency, resilience and social equity) are relevant. However clarity should be provided to ensure that in addition to resource efficiency, the long-term preservation of natural resources should be emphasised as per the description in the body of the report. This includes issues such as deforestation, land degradation, biodiversity loss, pressure on water etc. This point should also be considered as it applies to all farming systems in recommendations 11 -14.

Also in relation to social equity, in addition to working conditions, consideration should be given to the roles of different livestock systems in providing local employment especially in the context of increasing migration and impoverishment in certain areas. This point should feature in the recommendations.

## **3. *Four Different Livestock Farming Systems - commonality***

Recommendations that have commonality with the four main types of livestock farming systems should be grouped in a new section with relevance to all farm systems. This would bring efficiency to the document and will cover some systems which fall between the types currently outlined, e.g. medium sized mixed crop and livestock farms with some grazing. One could consider for instance introducing these common recommendations with a header based on paragraph 26 of the summary, followed by (a) paragraph(s) that include the recommendations applicable to all livestock farming systems, e.g. on the importance of producer organisations and sustainable livestock management, including animal health. The document could subsequently end with recommendations that are specific to the different types of livestock farming.

## **4. *SDGs***

We must acknowledge the key role of the recommendations in achieving the SDGs. Reference should be made to the fact that achievements in other sectors (especially in connection with the achievement of the SDGs) can alter the challenges and drivers for livestock farming. For example reductions in food losses and waste may reduce the requirement for an increase of 60% in food production by 2050.

## **5. *Human Rights***

The recommendations should be more clearly anchored in the framework of human rights.

## **Areas Supported (To be strengthened)**

## **6. *AMR***

We support the reference to AMR in the recommendations which refer to 'reduction in the use of antimicrobials', but we feel that the recommendations could be strengthened by including some of

the references elsewhere in the report such as reference to ‘antimicrobial resistance’, ‘reduction in prophylactic use of antibiotics’ and also a reference to the correct and appropriate use of antibiotics to treat specific animal diseases in order to prevent the development of antimicrobial resistance in animals and humans. Antibiotics are not an infinite resource and they must be used sustainably. This could be included in recommendation 8 (Livestock Diseases), as it has applications for all systems and is linked with good welfare and husbandry practices, as an alternative to the overuse of antibiotics. In recommendation 14e the use of antimicrobials for prophylaxis should be reduced and their use as growth promoters eliminated.

## **7. Animal Health and Welfare**

The five freedoms for animals don’t feature in the recommendations. We propose to insert a reference in recommendation 8d (e.g. :‘provide financial and technical support for good animal health and welfare - delivering the five freedoms - in agricultural development, including for capacity building programmes’).

Therefore, also the title of recommendation 8 should change to: ‘Improve animal health and welfare’. References to the importance of locally based animal health services and of draught animals should also be made under this recommendation.

Recommendation 14d only refers to the OIE guidelines. However, these OIE guidelines do not cover all relevant animals. Therefore we propose to add the words ‘other initiatives exceeding these’ to this recommendation, at the end. Not solely private sector initiatives, but of governments (like the EU) or of NGO’s.

Recommendation 11d could be formulated more clearly by expanding the sentence: Leveraging the potential of livestock as a means for sustainable livelihoods in smallholder mixed farming systems, enabling farmers to make better use of their livestock resources through improved husbandry, and suitable and accessible animal health and extension services.

## **8. Context Specific Pathways**

We agree that solutions can only be implemented when they are context-specific; the large variety of livestock systems in the world does not allow a one size fits all solution. This requires the involvement of regional/local stakeholders and the implementation of regional programs with suit the needs of the local populations. In our view this scientific analysis should be tied to the experiences of livestock farmers, pastoralists, etc.

Regarding recommendation 1: Good to read GASL is mentioned as a vehicle to create change in the livestock industry in close collaboration with the stakeholders. LEAP could be added as well.

Also, mixed farming is promoted as a way to integrate livestock in a sustainable way in the whole food chain. We agree with this conclusion but would like to stress that an integration can also be realized in a local or regional setting, e.g. combine arable and livestock farmers locally.

## **9. A ‘Sector’ or ‘Food System’ based approach to drive sustainable change in livestock farming systems.**

The link between livestock systems and food systems should be emphasised including connecting to markets (in this connection reference could be made to some concepts and recommendations from

'CFS Connecting Smallholders to Markets'), sensitivity to market signals and attention to the equitable distribution of profit throughout the value chain.

### **10. Price Volatility**

Recommendation (6) could be strengthened by referencing to other tools such as diversification, specific reference to cooperatives, exploring new markets, market price transparency through ICT etc. These sort of tools are much preferable to storage. Appropriate food safety controls also protect market confidence as food scares can cause volatility.

### **11. Education, Training, Knowledge Transfer and R&D**

Education, Training and Knowledge Transfer should be emphasised with reference to the important role that farmers' organisations should play in disseminating advice and support to farmers. Education is referenced but not addressed separately. There is scope to address education and training, as well as innovation, in connection with recommendation 9 'Research and Development'. This would dovetail well with recommendation 9 (d) referencing the great potential of ICT which we strongly support. Investing in R&D is key to improving livestock production in the world. Developing good practices, closing the productivity gap and developing markets are ways to implement the UN-SDG's in the livestock sector. GASL and LEAP are in an excellent position to contribute to this goal. Moreover, (continuous) training and public information services are key for moving towards more sustainable, better-performing systems. Innovations (by livestock farmers) are complementary to research work and should be fostered.

### **12. Building Resilience**

We appreciate that one of the 3 pillars the report builds on is resilience, however the recommendations do not focus enough on the importance of SAD to building resilience. Recommendations should also take into account the resilience of livestock production systems to drought and the associated potential to use livestock to adapt to climate change.

### **13. Gender**

We welcome recommendation 4 on gender, which contains specific recommendations aiming at overcoming some of the specific challenges women face and closing the gender gap. Data collection on women in the livestock industry is very important because women play such an important role, particularly in Africa. However, we think that gender language could be further improved under this section. For example, not only should women be included in every stage of the livestock value chain but opportunities to diversify the chain should be sought in order to benefit both men and women. Gender should also be mainstreamed throughout the whole document including in reference to transformation of agricultural systems, conservation of natural resources and adaptation to climate change. It should be considered whether recommendations contribute to level the playing field, helping provide with the same opportunities to women and men. Reference to 'productive and reproductive roles' (4e) should be replaced by referring to the need to support parents to combine family obligations with work responsibilities.

Specific reference should be made to women's participation in decision making.

## **Areas of Concern**

### **14. Nutrition**

References to nutrition and food systems may not be necessary in the Policy Recommendations as these will be covered by the forthcoming HLPE report on Nutrition and Food Systems.

However, it is important to reflect the essential contribution of products from livestock including protein and micronutrients (iron, vitamin A, iodine and zinc), particularly for sensitive populations (see HLPE report p. 35), while recognizing the need to adjust the consumption of products from livestock nutritional requirements to limit deficiencies and excesses (see summary report paragraph 9).

The increasingly important issue of the sustainability of agricultural production in responding to rising demand for animal proteins must also be addressed, with a clear exposition of the environmental, social, cultural, sanitary and economic consequences, also examined from the standpoint of the coherence of food, agricultural, energy and environment policies.

### **15. Approaches to SAD Solutions**

A range of solutions to SAD are referenced in the body of the report and there is acknowledgement that they are encapsulated in a range of approaches which include organic, agro-ecology and sustainable intensification; *'all of which derive from the need for a shift towards more resource efficiency and care for natural resource use'*. The report acknowledges that they must take a broad view beyond the farm gate and they are dependent on a high level of farmer skills and management to operate (OECD 2001). Given the momentum behind some of these approaches, we feel that they deserve specific reference. This reference may be considered in connection with the fact that the main three principles in the pathways to growth; resource efficiency, resilience and social considerations are all addressed in the approaches above. Organic farming is also referenced with regard to the merits of mixed animal crop farming and the use of animal manure in place of artificial fertilisers. Reference to these different approaches could also serve to acknowledge the spectrum of farm systems between the four main ones outlined in the recommendations.

### **16. Genetic Resources**

We need to consider carefully the work of the Commission on Genetic Resources for Food and Agriculture and the Intergovernmental Technical Working Group on Animal Genetic Resources for Food and Agriculture including the 'The Global Plan of Action for Animal Genetic Resources and the Interlaken Declaration'. Consultation with these may result in some nuancing of the recommendations under recommendation 7 'Genetics' - there is some concern that that they were not fully considered.

The recognition and protection of rights to determine access to livestock genetic resources should be broadened (ref. 7f).

### **17. Review and improve indicators and methodology and identify data gaps**

There seems to be a gap between the recommendations and the so far identified data gaps and needs. There is clearly a risk that the recommendations, when put in place and further analysed will lead to an increasing burden for statisticians and respondents. It should therefore be made clear that cost-benefit analyses should be carried out and priority settings made before setting up the data requirements, including consultations with statisticians. Otherwise we risk the same problems as for example for the GHG emissions where available data were not considered when fixing the guidelines, leading to quite an increase in burden, with limited added value.

A reference could be inserted to World Agricultural Watch (WAW) in paragraph 10a among the tools that can be used – the role of the WAW is to monitor changes in agrarian systems.

A recommendation could be added inviting international organisations to build tools for the measurement of the environmental impact of systems of livestock farming (e.g. GHG emissions, impact on biodiversity) able to be used on any livestock farm by the actors themselves..

### **18. Further Research**

We feel that the report and recommendations do not sufficiently address the dilemma that global demand for animal products will only rise, while livestock is already using a dramatic proportion of available land. The report speaks of “huge environmental challenges” and “huge potential for improvement”. But further insight is needed into the question whether or not the currently foreseen improvements are enough to satisfy increased demand on the one hand, whilst ensuring sustainability on the other hand. As the current report doesn't address this, we suggest including a new recommendation on the need for further research on this issue.

### **19. Pulses**

We think there is not sufficient reference to the role of pulses. Pulses have clear, proven multiple benefits (improving soils, agronomic benefits by crop rotation and by inter-cropping, contribution to preserving biodiversity, having low water footprint, providing healthy protein source, etc.) with impact on livestock systems. We would support an appropriate recommendation on pulses.

### **20. Standards**

When referring to international standards (e.g. 5b, 14d), we would like to stress that many relevant standards already exist (CODEX, WHO, OIE) and that it is important to promote and implement them. Moreover, at the national level, it is the task of public authorities to define standards, while it is for the producer organisations and private sector to implement them (ref. 5c).

### **21. Other comment**

- Where relevant, references to international agreements or initiatives could be included (e.g. Paris Agreement on Climate Change, Lima-Paris Action Agenda, LEAP initiative)