

**POLICY RECOMMENDATIONS ON AGROECOLOGICAL
AND OTHER INNOVATIVE APPROACHES**

- DRAFT 1 -

PRELIMINARY COMMENTS AND OBSERVATIONS BY ARGENTINA

Argentina appreciates Draft 1 of the Policy Recommendations on Agroecological and other Innovative Approaches as a good and comprehensive base for negotiations.

Preliminary comments and observations are hereby presented.

I. GENERAL COMMENTS

- a) The document singles out agroecology and does not refer, in a balanced manner, to other innovative approaches. In this regard, Argentina believes that the Policy Recommendations would be more valuable if they were more inclusive of other innovative approaches that are also sustainable.
- b) In the same vein, Argentina has some concerns regarding the way in which current agricultural policies and technological innovations are characterized or framed in the preamble. The current drafting could somehow imply that most technological innovations –as opposed to innovative approaches– generate negative externalities or are not sustainable. There is also reference to the fact that not all innovative approaches contribute to sustainable agriculture in the same way. Notwithstanding the accuracy of this statement true, this type of drafting might be interpreted as discouraging of investments in technologies and innovations that do not fit into an agroecological approach.
- c) Several references are made along the document to the need for transforming pathways, transitions and/or radical changes. Although the aim of these Policy Recommendations, of voluntary nature, is to move forward to a scenario of more sustainability, it is important to bear in mind the discussions held in FAOs governing bodies, namely the 128th Session of the Program Committee and the 164th session of the Council, where it was agreed that “transformations of food systems should be encouraged in a coherent manner, as appropriate and according to and dependent on national contexts and capacities”.
- d) On the issue of externalities and the need to factor them into prices, there is a presumption that current prices are only market-driven and they do not reflect social, environmental and health related externalities. Argentina considers it important to highlight that when assessing sustainability, the economic pillar should be equally considered: firstly, because these pillars are indivisible and any action on one of them could imply trade-offs with the others, so they must be considered as a whole; and secondly, because we shouldn't presume that the economic pillar of sustainable development is necessarily factored in current market prices.

- e) Some policy recommendations relate to aspects that should be evaluated within the framework of multilaterally agreed trade rules so as to prevent these virtuous initiatives from becoming trade distorting barriers. This consideration applies to some of the proposals included in recommendation blocks 1 and 3, particularly, those related to mechanisms to promote short supply chains, incentives and labelling and certification schemes, including those that may derive from incorporating certain externalities into prices.

II. SPECIFIC COMMENTS

a. PREAMBLE

- i. In **paragraph 5**, reference is made to the need for "radical changes". Such statement is not clear in its scope, meaning, or object. Therefore, Argentina would appreciate further clarification in this regard.

On the other hand, when pointing out the impacts of the Covid-19 pandemic in various socioeconomic contexts, it would also be necessary highlight its impacts in different cultural and geographical contexts. Therefore, the following wording is suggested:

*(..) While the virus itself does not distinguish between different people, the impacts have been very unequal because of socio-economic, **cultural and geographical** contexts at national and global levels.*

Furthermore, when pointing out that agriculture and food systems are embedded in wider environmental and human made systems, it is also worth making reference to ecosystems. Hence, the following addition is suggested:

*(...) It has shown that agriculture and food systems are embedded in wider environmental and human-made systems (such as economies, **ecosystems** and landscapes) and that they impact these systems, and are strongly impacted by them.*

- ii. **Paragraph 6** recalls that agroecological approaches were highlighted in the CFS request to the HLPE. In this regard, it is important to also recall considerations that were put forward at the 44th session of the CFS (2017), particularly during the discussions on the CFS Multiannual Work Program for the years 2018-2019 (document CFS 2017/44/8 Rev.1). Such document specifies: "The HLPE is requested to produce a report presenting evidence on the potential contribution of agroecological and other innovative approaches, practices, and technologies to creating sustainable food systems that contribute to food security and nutrition".

Therefore, Argentina understands that reference to "other innovative approaches" should be included in a balanced manner throughout the document, as it is an integral part of the mandate given by the Committee to the HLPE.

Finally, and with reference to the emphasis posed on Covid-19's impact on "resilience", Argentina prefers the use of the term "sustainability". That is, in the understanding that the concept of sustainability encompasses in all three dimensions of sustainable development, which have all been affected by the impacts of the pandemic.

- iii. **Paragraph 7** addresses the need of contributing to sustainable agriculture through transition pathways towards the transformation of food systems. In this regard, it is important to note that the issue of the transformation of food systems has been widely discussed at the 164th Session of the Council, during which Members reaffirmed the consensus reached at the 128th session of the Program Committee and "recalled that transformation of food systems should be encouraged in a coherent manner, as appropriate and according to, and dependent on, national contexts and capacities". (paragraph 15.k of the 164th Council Report).

Therefore, although the Policy Recommendations draft was prepared on the basis of the Report elaborated by the HLPE in July 2019, the document should consider discussions that have taken place after the publication of the relevant HLPE report, as well as the agreements reached by Members.

- iv. In relation to **paragraphs 11, 12 and 14**, the current drafting appears to convey a negative view on investments in innovative approaches other than agroecology, on the grounds that they could potentially cause adverse impact on the social and environmental dimensions of sustainability, while generating favorable results in economic terms. It is important to recall that assessments on sustainable development should consider all its three dimensions in an integrated and balance manner.

Such considerations, along with paragraph 14 –which states that "not all innovative approaches contribute to sustainable agriculture and food systems in the same way"–, could discourage investments and developments on other innovative approaches other than agroecology; all of which should also be promoted in the Policy Recommendations.

A more balanced approach should therefore ensure the inclusion of all innovative approaches that encourage sustainable food systems and contribute to food security and nutrition.

- v. In **paragraph 13**, where the importance of incorporating the use of digital technologies into agricultural activity is addressed, Argentina suggests the following modification:

*(...) At the same time, concerns about access, **benefit sharing –including of those arising from commercial use–**, capacity-building, leveling the playing field, and appropriate safeguards regarding data privacy, access ...*

- vi. **Paragraph 15** includes a list of multilateral instruments on which the Policy Recommendations builds on and contribute to. Argentina considers that the Rio Declaration on Environment and Development should be included:

*(...) such as the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW), the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), **the Rio Declaration on Environment and Development***

*(1992) and the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP). These recommendations aim to support the achievement of **the 2030 Agenda and its Sustainable Development Goals, as well as** the goals of the UN Decade on Family Farming (UNDF), the UN Decade of Action on Nutrition (2016-2025)...*

b. POLICY RECOMMENDATIONS

Recommendation 1

- i. Regarding the pathways to move towards sustainable food systems, as mentioned in the **chapeau** of this set of recommendations, Argentina recalls that the conditions under which such transformations/transitions of food systems would occur have been considered by the 164th FAO Council and should be reflected throughout the document (see point II.a.iii of these comments)
- ii. Secondly, and regarding **point a)** and the call to consider negative and positive social and environmental externalities in assessments on the sustainability of food systems, Argentina would like to stress that SDG 2.4 calls for ensuring sustainable production systems, a concept that encompasses the three dimensions of sustainable development (economic, social and environmental) in a balanced way. Hence, the importance of also considering the economic dimension in any analysis on sustainability is highlighted. Economic aspects should not be left aside, especially not in the context of a comprehensive evaluation of the sustainability of agriculture.
- iii. Furthermore, **point g)** refers to encouraging policies that allow to factor social, environmental and health externalities into prices. This type of phrasing could suggest that current prices do not correctly reflect production costs and their externalities, and may lead to the application of border measures as a way to penalize negative externalities, including possible practices or methods of production considered unsustainable. In this regard, Argentina would like to highlight that any measure should respect WTO rules, should be based on sound scientific evidence and should be the least restrictive of trade, in order for it to achieve its legitimate objectives.
- iv. Regarding **point h)**, while it is understood that circular economy can be a tool to achieve sustainable development, it is not the only one. Therefore, it is important to recognize that there are other available ways to achieve sustainable development, which would give space for each country to take whichever is most appropriate to its capabilities, context and needs.
- v. On the other hand, the wording of **point i)** could imply an encouragement to sustainable diets, a concept that has not been defined and that could discourage the consumption of products such as meat and dairy products (due to their supposed negative effects in terms of health and environmental impact). Hence, Argentina suggests that instead of referring to “sustainably produced diets”, the recommendations should encourage the development of sustainable food systems, in line with what was agreed in the 2030 Agenda for Sustainable Development, particularly SDG 2.4.

Furthermore, Argentina would like to stress the importance that any certification or labeling scheme be developed and applied in accordance with multilateral trade rules to avoid possible disguised restrictions on international trade.

In view of the above, the following changes are suggested:

*States (and regional and local authorities), **subject to their national regulations and as appropriate** in consultation with inter-governmental organizations, producer organizations, the private sector (including **micro** small and medium sized enterprises) and civil society, are invited to:*

*Recognizing the need for **appropriate and national-context capacities dependent** ~~appropriate~~ pathways to move towards sustainable agriculture and food systems:*

*a) Undertake comprehensive assessments of the sustainability of their agriculture and food systems (see Recommendation 2), paying due attention to all positive and negative environmental, **economic** and social externalities, as the first step to developing context-appropriate transition pathways; (...)*

*g) Strengthen public policies to harness market mechanisms to enable sustainable agriculture and food systems by factoring environmental, social and public health externalities ~~into prices~~ **in accordance with multilaterally agreed rules**; (...)*

*h) Encourage sustainable consumption patterns that maintain or enhance rather than deplete natural resources, and support circular economies **as well as other available tools to achieve sustainable development** in collaboration with all relevant stakeholders in particular the private sector*

*i) Promote sustainably **produced** ~~produced~~, **and** affordable and healthy diets, considering local context and culture and indigenous and regional diets, through appropriate food labelling and certification in line with **multilaterally agreed rules** ~~applicable national and international standards~~; (...)*

Recommendation 2

- vi. Regarding the call made to develop comparable, comprehensive and globally accepted metrics and indicators, Argentina underlines the importance of not imposing one-size-fits-all style measurement methodologies, since all indicators should adjust to the production conditions and specific contexts in which they are to be measured.
- vii. On the other hand, regarding the call under **point c)** to promote the use of Ecological Footprint, Argentina would like to recall that there is no multilaterally agreed methodology for its measurement. Although an ecological footprint definition is included in the annex, it has been extracted from the HLPE report and it does not been agreed upon at the multilateral level.

In light of the above, it could be premature to promote the measurement of such footprint in this instance, especially if it involves adopting methodologies developed under certain production conditions as the basis of the calculation.

Argentina considers that this type of initiative could lead to demands for labeling or certification (both by the private sector and by governments), and some of them may turn into restrictions on international trade. Furthermore, there is the risk of various measurement requirements proliferating, in view of the lack of an agreed methodology, which could lead to eventual multiple certification requirements in different markets to which food is exported, consequently increasing costs for exporting countries. Hence the importance of adopting a methodology at the multilateral level, that could also be adapted to national contexts and development needs of each country.

For this reason, it is deemed important that any sustainability standard be designed and implemented in such a way that: (i) it is compatible with the WTO rules and does not constitute a restriction on international trade; (ii) it is based on sound scientific evidence and has true environmental benefits; (iii) its elaboration is carried out in a transparent and inclusive way, through a consultation process involving all interested and/or potentially affected parties; and (iv) takes into account the special capacities and needs of developing countries.

Recommendation 3

viii. The title of this set of Recommendations ignores the fact that transitions should be encouraged only if considered relevant (as pointed out at the 164th session of the FAO Council), and also indicates that such transitions should lead to resilient, diversified and integrated agriculture; all concepts that go beyond agreed language.

SDG 2.4 calls for encouraging sustainable food systems, a concept that takes social, economic and environmental aspects into account in a balanced way. However, the reference in this Recommendation to “resilient food systems” could convey a greater preponderance of the environmental dimension over the other two.

ix. **Point c)** refers to incentives for the diversification and integration of agricultural production. In this regard, Argentina reiterates that any type of financial incentive for the agricultural sector must be governed by the rules of the WTO, and particularly, by those included in the Agreement on Agriculture and its Annex 2.

This is especially relevant in the context of the ongoing process of reform of the multilateral agricultural rules taking place in the WTO, including the negotiations to reduce and eliminate subsidies to the sector. It is also relevant to recall that goal 2.b of the 2030 Agenda calls for "Correcting and preventing trade restrictions and distortions in world agricultural markets, including through the parallel elimination of all forms of agricultural export subsidies and all export measures with equivalent effects, in accordance with the mandate of the Round Doha Development Agenda".

In view of this, the reduction and removal of agricultural subsidies should be ensured, since they affect international trade of agricultural goods, consequently impacting food

security and nutrition for producers of these goods from other countries that do not subsidize.

Therefore, it is important that objectives linked to improving the sustainability of agricultural systems are not used as a justification to maintain or increase measures that distort trade and that any financial incentive/subsidy that is granted takes into account the obligations derived of the multilateral rules.

- x. Regarding the use of the phrase “*responsible use of agrochemicals*”, Argentina would appreciate to have more details on the meaning and scope of the term “responsible use”. In this regard, according to the WTO –in particular, those included in the Agreement on the Application of Sanitary and Phytosanitary Measures–, any measure adopted to preserve the health of people, plants and animals must be based on a scientific risk assessment. Therefore, rather than calling for the “responsible use” of agrochemicals, it would be preferable to refer to the use of agrochemicals “in accordance with scientific grounds”.
- xi. Regarding **points o), p) and r)** on the strengthening of short supply chains as a measure to achieve greater resilience against global shocks and the encouragement of the consumption of local products, the reasons behind the presumption of short chains being more resilient in the face of global shocks are unclear. Incentivizing short chains directly affects producers who are located further away from consumption centers; given that many of them depend on the possibility of selling the food they produce in international markets as a means of achieving food security. Discouraging this way of subsistence would have devastating effects on the food security of many rural populations, especially in developing countries; which would be contrary to the objectives that these Recommendations pursue.
- xii. Regarding **point k)**, it is relevant to promote an integrated approach to the exploration, conservation and sustainable use of genetic resources within the framework of the protection of biodiversity. In this sense, the following wording is proposed:

*Govern territories and landscapes at appropriate levels and in an inclusive way so as to respond to local needs, including enhancing the provision of ecosystem services and managing trade-offs between them, protecting biodiversity-rich habitats, **promoting an integrated approach to the exploration, conservation (including evaluation and documentation) and sustainable use of genetic resources for food and agriculture** and responding to the local impacts of global emergencies, (...);*

- xiii. Along the same lines as point II.a.v of these comments, Argentina suggests adding the concept of the sharing of benefits derived from the use of digital tools in **point w)**:

*Request the HLPE to review evidence of benefits and challenges of digitalization for sustainable agriculture and food systems that enhance food security and nutrition, **including the sharing of benefits from the use of digitalization**; assess the potential of digitalization for contributing to the full range of agroecological and other innovative approaches; review national and regional policies,*

including with respect to safeguards; consider challenges and implications for governance; and provide relevant policy advice.

Recommendation 4

- xiv. The **chapeau** of this set of recommendations refers to the role that research, dissemination and education play for understanding social-ecological systems in agriculture and food systems. The scope of the phrase “*complex social-ecological systems in agriculture and food systems*” is unclear, which is why Argentina would prefer to replace this wording by referring, instead, to the role of research, dissemination and education in helping understand the interaction among the three dimensions of sustainable development in agriculture and food systems.
- xv. Under **point d)**, when reference is made to conservation and sustainable use of biodiversity, it would be equally relevant to refer to benefit sharing, thus reflecting all three objectives of the Convention of Biological Diversity. The following drafting is suggested:

*Prioritize problem-oriented research that addresses the needs of vulnerable groups, and focuses on the local dimensions of global challenges, such as climate change adaptation and mitigation, ecological footprint of different production systems and value chains, biodiversity conservation, ~~and~~ sustainable use **and benefit sharing** (...)*

- xvi. Under **point f)**, Argentina proposes the following addition:

***Subject to national legislation, t**Take appropriate measures to promote the right of peasants and other people working in rural areas to maintain, express, control, protect and develop their knowledge, (...)*

- xvii. Regarding **point 4.k)**, in line with point II.a.iv of these comments concerning paragraphs 11, 12 and 14 of the Preamble, Argentina suggests underscoring the importance of increasing investments in investigation and development of all innovative approaches, not limited to agroecology.

- xviii. After point 4.k), Argentina proposes a new paragraph:

Promote the sharing of benefits from the use of genetic resources for food and agriculture, including the benefits arising from their commercial use.

Recommendation 5

- xix. In the **chapeau**, it would be relevant to frame the recommendations in the context of national regulations on the matter. Therefore, the following wording is suggested:

States, according to their national regulations, are invited to encourage regional and local authorities, producer organizations, indigenous peoples,

women s organizations, community leaders, the private sector and civil society
~~are invited~~ to:

Proposal of a new recommendation

xx. Argentina requests the inclusion of a new recommendation, as follows:

Resource mobilization and international cooperation (+ footnote)

States shall take the necessary and appropriate measures in the framework of relevant international mechanisms, funds and bodies to ensure due priority and attention to the effective allocation of predictable and agreed resources for the implementation of these Policy Recommendations.

International, regional and bilateral cooperation shall, in particular, be directed to establishing or strengthening the capabilities of developing countries and countries with economies in transition in order to implement these guidelines.

(Footnote: taking into account Principle 7 from the Rio Declaration, according to which: States shall cooperate in a spirit of global partnership to conserve, protect and restore the health and integrity of the Earth's ecosystem. In view of the different contributions to global environmental degradation, States have common but differentiated responsibilities. The developed countries acknowledge the responsibility that they bear in the international pursuit of sustainable development in view of the pressures their societies place on the global environment and of the technologies and financial resources they command.)