1. Brazil views the right to adequate food as pivotal to the international considerations of the subject of food security and nutrition and sees it as a presiding principle for the work of the Committee on World Food Security and to the present policy convergence process with regard to "Agroecological and other innovative approaches" to food security and nutrition.

2. Brazil believes that there are many solutions for the promotion of sustainable food systems, and different contexts present different potentialities. Specific productive, natural, economic and social circumstances, among other factors, must be taken into account when assessing challenges and identifying the best opportunities for increased production and sustainable use of natural resources.

3. Brazilian legislation relating to food security and nutrition acknowledges that the implementation of policies and measures in this realm must take into account environmental, cultural, economic, regional and social dimensions. It should also be consistent with the sustainable use of natural resources and biodiversity.

4. The references to sustainability or sustainable development must consider the three pillars of sustainability - economic, social and environmental - in a balanced and integrated way, as referred to in the "Future We Want", on the occasion of the United Nations Sustainable Development Conference, when the international community agreed to "mainstream sustainable development at all levels, integrating economic, social and environmental aspects and recognizing their interlinkages, so as to achieve sustainable development in all its dimensions".

5. Our model for public policies to encourage agroecology is the National Policy of Agroecology and Organic Production (PNAPO), which aims to integrate, articulate and adapt policies, programs and actions promoting production methods of organic and agroecological bases, as a contribution to sustainable development. The PNAPO indicates that the strengthening of agroecology requires intersectoral actions which include the development of technologies, the provision of free and qualified technical assistance, credit and other agricultural instruments adapted to the reality and scale of agroecological production, and the strengthening of traditional productive groups, specifically rural women, who today concentrate much of agroecological production in Brazil.

6. We support that this current policy convergence process on agroecology to food security and nutrition maintain a strong link to family farming and to the Decade of the United Nations on Family Farming (2019-2028). Family farming is central to the social, economic, political and cultural dynamics that led to the construction of food security and nutrition regime in the
world. For the development of family farming, which accounts for the majority of the agriculture establishments in the world, new technologies and means of production become increasingly necessary, in line with the sustainable use of natural resources and the preservation of agrobiodiversity.

7. Brazil would like to highlight that advancements in technology can enable previously unsuitable land to be used sustainably without harming ecosystem services. We would like to point out that the assessment of the ecological footprint in food systems is not defined or scientifically agreed. Ecological footprint is still a controversial concept as it does not adequately capture degradation or unsustainable use of natural resources. See Blomqvist L, Brook BW, Ellis EC, Kareiva PM, Nordhaus T, Shellenberger M (2013) - The Ecological Footprint Remains a Misleading Metric of Global Sustainability. PLoS Biol 11(11): e1001702. https://doi.org/10.1371/journal.pbio.1001702. In addition, the concept of ecological footprint does not encompass the social and economic aspects of sustainable development.

8. With regard to public policies referred to in the HLPE report, Brazil understands that policies which include economic subsidies to food production guise economic externalities and may be misleading or cause agriculture market distortion. The application and use of subsidies are distorting measures to trade, notably agricultural trade, depreciating international food prices and harming poorer farmers, especially small-scale farmers in developing countries. The application of subsidies, notably in the field of agriculture, and the use of other trade-distortive measures, in the end increase food insecurity, as they are not effective instruments to achieve better food systems and nutrition and more sustainable agricultural models. To be truly sustainable, agricultural systems, including agroecological systems, cannot rely on agricultural subsidies. Thus, agricultural subsidies should eventually be phased-out.

9. Referring to recommendation 2, a, IV, we support that States and intergovernmental organizations (IGOs) should strengthen the best agricultural practices on the use of chemicals potentially harmful for human health.

10. With regard to investments in public and private research and development, and in national and international research systems to support programmes in agroecological and other innovative approaches (recommendation 3, a), we support that reference is needed on the necessary improvement of technologies and on the research of measures to mitigate collateral effects. For instance, some plants used in the practice of green manure, very common in the agroecological production system, are capable of adding up to 280 kg/ha of N that can lead to nitrate contamination of the water table. Therefore, the development of research to mitigate side effects should also be considered.

11. Contrary to the specific metrics used in the HLPE Report (10-1000km2: recommendation 2, a, V), Brazil understands that landscape scale should be adapted to countries’ realities. In this sense, we view that public policy processes must be implemented based upon the scale determined by national authorities, according to national realities.

12. Brazil sees that the regulation of land acquisition in large areas should not differ from other land sizes. In this sense, with reference to recommendation 4, d, States, IGOs and, as appropriate, local authorities should follow their national legislation, not differentiating between large-scale and other scale acquisitions, since it is not a common regulation to all countries’ laws.

13. Regarding assessments of modern biotechnology mentioned in the HLPE report, including the proposal for a global observatory for gene editing, Brazil recalls that specific international instruments already address those issues (such as the Convention on Biological Diversity and its Cartagena Protocol on Biosafety). References to the subject within the current policy
convergence process should consist only of references to those internationally agreed instruments, so as to avoid inconsistency or duplication of efforts.

14. With the aim of meeting the objective of the agroecology workstream which is "to broaden understanding on the type of interventions, enabling policies and tools, institutional arrangements and organizational changes that can enable and promote positive changes in sustainable agriculture and food systems", Brazil provides the following additional suggestions for the policy convergence process, which should:

- Support and promote technical extension services to agroecological farmers and their enterprises;
- Support access of agroecological farmers to markets;
- Stimulate government procurement and institutional acquisitions and incentives to purchase local agroecological products to provide food in schools, hospitals, day care centers and social welfare institutions, among others;
- Strengthen policies, programs, actions, initiatives and fora which bring together farmers and consumers around agroecology;
- Foster the integration of agroecology and food system approaches into education and research agendas to improve healthy eating education;
- Stimulate the creation of comprehensive national action plans which support the development of sustainable inputs to food production;