Comments from the European Union on its behalf on the Rapporteur's Note on the “CFS Policy Convergence Process on Agroecological and Other Innovative Approaches”

– The European Union and its Member States will provide a joint view on the Zero Draft, once published

The comments hereafter highlight key issues for the European Union; some of them have already been covered by our contribution of December 2019, available here: http://www.fao.org/cfs/workingspace/workstreams/agapp/en/; some other elements are new.

INTRODUCTION
Definition of agroecology: We cannot ignore the fact that the HLPE clearly concludes that there is “no single, consensual definition of agroecology shared by all the actors involved, nor agreement on all the aspects embedded in this concept” and that “there is no definitive set of practices that could be labelled as agroecological, nor clear, consensual boundaries between what is agroecological and what is not”.

In the specific framework of the CFS convergence policy process, we would recommend to use a careful terminology (i.e. avoiding “agroecology” since we do not have a definition). Alternatives could be considered, such as “agroecological approaches” and, in the absence of an international agreed definition for agroecology, to agree on criteria or principles as way forward in accordance with the content of points 4 and 6 of the HLPE Summary (p.14).

We do recognize that the HLPE report focused very much on agroecological approaches and it is less focused on other innovative approaches. It will be important to make sure that convergence process is seen as an opportunity to further develop the focus on the other innovative approaches. We consider that is important of making sure that all approaches are equally treated, in particular their contribution for the food systems transformation.

2. SUPPORT TRANSITIONS TO DIVERSIFIED AND RESILIENT FOOD SYSTEMS

a) Agricultural subsidies and incentives

We recognise the importance and the role that agricultural subsidies and incentives can have in fostering the transition towards sustainable food systems. However, we consider that this debate should take into account the relevant work and existing rules at multilateral level (i.e. WTO and OECD). We therefore recommend to work together with the WTO and the OECD on the basis of their work in this area.

Performance metrics: As several FAO members referred during the discussion at the last CFS, we should stress the importance that FAO - as a global knowledge organization – establishes performance metrics of agriculture and food systems as a basis for environmental, social and economic assessment, policy implementation and investment decisions. This is particular important for allowing a serious debate on the contribution of each type of farming system in the transformation of food systems.

b) Trade

On trade, we consider indeed that the bilateral trade agreements can be used as promoters of the
transformations towards sustainable food systems. However, it is important to consider the existing multilateral framework and to promote it.

e) Genetic resources used for food and agriculture and intellectual property

Intellectual property aspects play an important role in strengthening sustainable food systems. The focus should be along the food chain (e.g. from seeds to the quality of the food products). We would like to have a clear reference to the importance of developing Geographical Indications given their potential to foster the transformation towards sustainable food systems. In this respect, the EU quality policy is a good example.

**Food safety** is a key element for food security and should be more prominent in the document. It shall be included here:

f) Regulations on the use of agrochemicals

Strengthen neutral scientific research to assess the impact of the use of agrochemicals on human, animal and environmental health (*food safety, exposure of workers, environmental pollution*) and the environment in order to inform policies and programmes with a view to reduce their use.

h) Healthy and diversified diets

**Promote food safety** and nutrition education, bearing in mind the contextual nature of eating habits.

i) Food value chain

**Ensure food safety throughout the food chain**

4. STRENGTHEN AGENCY AND STAKEHOLDER ENGAGEMENT, EMPOWER VULNERABLE AND MARGINALIZED GROUPS AND ADDRESS POWER INEQUALITIES IN FOOD SYSTEMS

f) Agency

**New concept of Agency:** We believe that the new concept of “agency” suggested by the HLPE as a fifth pillar of FSN needs to be further discussed before considering any amendments to the internationally agreed definition of FSN.

5. ESTABLISH AND USE COMPREHENSIVE PERFORMANCE MEASUREMENT AND MONITORING FRAMEWORKS FOR FOOD SYSTEMS

c) Food product certification

It is important to avoid confusion and an overlapping between organic farming and agroecology: Although the HLPE classifies both organic and agroecology as approaches under the category of “agroecological and related approaches” (p.63), it important to clearly distinguish the two concepts. At EU level as it is the case in many countries in the world, the organic farming has since years a well-defined regulatory framework.

c) Assessment of biotechnology

The purpose should be further clarified.