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Compassion in World Farming welcomes the opportunity to comment on the draft of *Towards a common understanding of sustainable food systems*.

**Definition of sustainable food systems, page 8**

This rightly provides that the food system must operate “*in such a way that the economic, social and environmental bases to generate food security and nutrition of future generations are not compromised*”. This wording would allow the food system to operate in ways that compromise key environmental or other factors that do not directly impact food security e.g. wildlife. One of the greatest threats to wildlife is the fragmentation and destruction of habitats by expanding agriculture.

**Animal welfare, page 13**

We welcome the recognition that “food system activities need to contribute to the advancement of important socio-cultural outcomes, such as … animal welfare”. However animal welfare is not mentioned again although a definition of “animal welfare” is provided on which we comment below.

We believe that animal welfare should be included more fully in the report’s understanding of sustainable food systems. Industrial livestock production is the norm in the developed world and many emerging economies. Even with good stockmanship industrial livestock production has no potential for providing satisfactory welfare. Animals are confined in cages or narrow crates or in barren, overcrowded units which make it impossible for them to carry out their natural behaviours. Many are pushed to such high yields or fast growth that they suffer from painful health problems including lameness, bone deformities and bone fractures.[[1]](#endnote-1) [[2]](#endnote-2) [[3]](#endnote-3)

Animal welfare should not be regarded as a peripheral consideration in the formulation of food and farming policy. Instead it should be accepted – together with food security, public health, the environment, climate change and farmers’ livelihoods - as one of the core criteria that must be satisfied by our food and farming systems.

**First paragraph of page 14**

We particularly welcome this paragraph’s holistic vision and recognition that proposed measures must be assessed against all other dimensions of sustainability to ensure there are no undesirable impacts.

We believe that it is important when developing policy on food and farming to take account of all the factors that may be influenced by decisions in this area. At present much research and policy-making is conducted in silos which can lead to the introduction of measures that may benefit one element (such as climate change) but have adverse impacts on other important considerations.

This is well put in *Global Food Security’s* new [policy brief](https://www.foodsecurity.ac.uk/news/181130-n-paris-compliant-healthy-food-systems-policy-brief-for-united-nations-climate-change-conference/) for COP24 of the UNCCC in Poland. This states: “Focussing solely on GHG emissions instead of wider metrics of sustainability could result in the loss of ecosystems and greater social inequality”.

**Definition of “sustainable diets”, page 17**

We set out in red suggested amendments to this definition

“***Sustainable diets*** *are those diets with low environmental and climate impacts which contribute to food and nutrition security and to healthy life for present and future generations.* ***Sustainable diets*** *are protective and respectful of biodiversity, animal welfare and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources.*

**Nutritional quality**

We think that the report should be clearer in highlighting that nutrition entails quality as well as quantity as too much of today’s discourse on food policy focuses on quantity alone. The FAO points out that the modern western diet lacks nutrient quality and highlights the need to integrate the dimension of nutritional quality into food policy.[[4]](#endnote-4)

**Better consumer information, page 18**

We fully agree with the statement that “people need better information and clearer recommendations regarding environmentally, socially and economically sustainable food and how food consumption impacts on all elements of the food system”. This is in line with Sustainable Development Goal 12.8 which states “By 2030, ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature”.

**Food losses and waste: section 2.2.3, page 22**

It would be helpful if this section recognised that the feeding of human-edible cereals to animals is a form of food loss. The UN Environment Programme calculates that the cereals which, on a business-as-usual basis, are expected to be fed to livestock by 2050, could, if they were instead used to feed people directly, provide the necessary food energy for over 3.5 billion people.[[5]](#endnote-5)  Cassidy *et al* (2013) conclude: “shifting the crop calories used for feed and other uses to direct human consumption could potentially feed an additional ~ 4 billion people.[[6]](#endnote-6)

In addition, Alexander *et* al (2017) calculate that 2.9 EJ (exajoules) are lost each year through overconsumption i.e. consumption in excess of nutritional requirements.[[7]](#endnote-7) This too is a form of food loss.

**Sustainable intensification: section 3.1.1, page 29**

“Sustainable intensification” has become a divisive term as it is used by some to justify calls for further industrialisation of crop and livestock production. The tendency by some is to focus on the “intensification” dimension of the term and largely ignore the “sustainability” element.

The term is pertinent in the poorest of developing countries where, for example, improved health and nutrition for animals would improve both productivity and animal welfare. It is an unhelpful term in developed countries where further intensification of crop production would lead to increased degradation of soils, overuse and pollution of ground- and surface-water, air pollution and biodiversity loss. Further intensification of livestock production would result in animal welfare problems and additional animal health problems leading to an increase in routine preventive use of antibiotics.

**Definition of “precision agriculture”, page 47**

Precision livestock farming (PLF) mainly operates in the intensive sector. By alerting farmers to problems at an early stage it can to a degree improve animal welfare and system efficiency. However, such improvements are made within a system that has inherently low potential for good welfare and is inherently inefficient due to its dependence on feeding human-edible cereals to animals. PLF may primarily be used to enhance the viability of intensive livestock production, to make it more feasible to keep very large herds or flocks in stressful, high density conditions with poor levels of welfare. PLF needs to find a role for itself in supporting an increased uptake of extensive farming which has much greater potential for delivering food security, environmental sustainability and good animal welfare than the intensive model.

**Definition of “circular agriculture” would be helpful**

The report includes a definition of “circular economy” but we believe a definition of “circular agriculture” would be helpful. The definition we use is: Circular agriculture minimises the use of external inputs by creating nutrients through the farm’s own activities, for example by using nitrogen-fixing legumes, rotations and manure in quantities that correspond to the land’s need for nutrients. Circular agriculture is regenerative; it builds soil quality and restores biodiversity. It ensures that its wastes are recycled into productive agricultural use rather than being allowed to escape and pollute the environment.”

**Definition of “animal welfare”, page 48**

This definition is helpful. However, it does not take account of the increasing scientific recognition that good animal welfare entails not only preventing negative factors but also providing the opportunity for animals to have positive experiences.  Mellor (2016) stresses that it is necessary not only to minimise negative experiences but also “to provide the animals with opportunities to have positive experiences” such as “comfort, pleasure, interest, confidence and a sense of control.[[8]](#endnote-8)

In its *Sustainability Policy Framework* Rabobank, a global leader in agriculture financing, highlights the importance of “promotion of positive experiences” and states that this “refers to improving welfare above the survival minimum by providing animals with enriching opportunities to engage in behaviours that increase their comfort, confidence and capacity to make rewarding choices. These principles support the contemporary recognition that acceptable animal welfare management should include both the minimization of negative experiences and the provision of opportunities to have positive experiences”.[[9]](#endnote-9)

Scientists are increasingly recognising the importance for animals’ physical and mental wellbeing of being able to engage in exploration, investigation, problem solving and play.[[10]](#endnote-10)  Špinka & Wemelsfelder (2011) point out: “monotonous, predictable environments may lead to apathy and boredom, and prevent animals from experiencing a positive quality of life”.[[11]](#endnote-11)

**Definition of “externalities”, page 52**

This is arguably too narrow. We suggest additions in red below

“~~Environmental~~ Externalities refer to the economic concept of uncompensated environmental and health effects of production and consumption that affect consumer utility and enterprise cost outside the market mechanism.

As a consequence of negative externalities, private costs of production tend to be lower than its “social” cost. Economists recognise the importance of internalising negative externalities, for example by regulation or fiscal measures. The FAO stresses: “In many countries there is a worrying disconnect between the retail price of food and the true cost of its production. As a consequence, food produced at great environmental cost in the form of greenhouse gas emissions, water pollution, air pollution, and habitat destruction, can appear to be cheaper than more sustainably produced alternatives”.[[12]](#endnote-12) It is the aim of the “polluter/user-pays” principle to prompt households and enterprises to internalize externalities in their plans and budgets.”

1. Knowles, T. G., Kestin, S. C., Haslam, S. M., Brown, S. N., Green, L. E., Butterworth, A., Pope, S. J., Pfeiffer, D. and Nicol, C. J., 2008. Leg disorders in broiler chickens: prevalence, risk factors and prevention. Plos one 3 (2): e1545. doi: 10.1371/journal.pone.0001545. [↑](#endnote-ref-1)
2. Laywell: Welfare implications of changes in production systems for laying hens: Deliverable 7.1 [↑](#endnote-ref-2)
3. European Food Safety Authority. 2009. Scientific Opinion of the Panel on Animal Health and Welfare on a request from European Commission on welfare of dairy cows. *The EFSA Journal* 2009 1143, 1-38. [↑](#endnote-ref-3)
4. Sustainable diets and biodiversity, 2012. UN Food and Agriculture Organisation, 2012 [↑](#endnote-ref-4)
5. Nellemann, C., MacDevette, M., Manders, et al. (2009) *The environmental food crisis – The environment’s role in averting future food crises*. A UNEP rapid response assessment. United Nations Environment Programme, GRID-Arendal, [www.unep.org/pdf/foodcrisis\_lores.pdf](http://www.unep.org/pdf/foodcrisis_lores.pdf) [↑](#endnote-ref-5)
6. Cassidy E.M *et al*, 2013. Redefining agricultural yields: from tonnes to people nourished per hectare. University of Minnesota. Environ. Res. Lett. 8 (2013) 034015 [↑](#endnote-ref-6)
7. Alexander P *et al*, 2017. Losses, inefficiencies and waste in the global food system. Agricultural Systems 153: 190–200. [↑](#endnote-ref-7)
8. Mellor, D., 2016. Updating Animal Welfare Thinking: Moving beyond the “Five Freedoms” towards “A Life Worth Living”. Animals 2016, 6, 21 [↑](#endnote-ref-8)
9. <https://www.rabobank.com/en/images/sustainability-policy-framework.pdf> [↑](#endnote-ref-9)
10. Špinka, M., & Wemelsfelder, F. (2011). Environmental challenge and animal agency. Animal welfare. Wallingford, UK: CAB International. p, 27-44. [↑](#endnote-ref-10)
11. *Ibid* [↑](#endnote-ref-11)
12. FAO, 2015. Natural capital impacts in agriculture [↑](#endnote-ref-12)