

42nd Session of the Conference
Written Correspondence Procedure – inputs from Members - original version

Item 15 - Biennial Theme 2022-23

Member Name	Comments
<p style="text-align: center;">New Zealand (Fri 21/05/2021 8:17 AM)</p>	<p>New Zealand strongly supports the Biennial Theme “Agriculture Food Systems Transformation: From Strategy to Action”.</p> <p>Sustainable Food Systems are central to achieving the Sustainable Development Goals and the 2030 Agenda. Continuing a focus on the theme of “Action” in 2022/2023 will build on progress made at the United Nations Food Systems Summit in September 2021, help ensure there are tangible outcomes and results from the discussions and proposals made this year.</p>
<p style="text-align: center;">Australia (Fri 21/05/2021 11:51 AM)</p>	<p>Australia welcomes the proposal to name ‘Agriculture Food Systems Transformation: From Strategy to Action’, as the theme for the 2022-23 FAO Biennium.</p> <p>Indeed, this biennium represents a crucial period for global action towards building more resilient, inclusive, and sustainable food systems, and we must aim to harness the momentum generated by the UN Food Systems Summit 2021. This is especially pertinent as we are swiftly moving towards the deadline for achieving the 2030 Sustainable Development Goals, yet we are facing major setbacks as a result of the COVID-19 pandemic.</p> <p>Slower economic activity in the wake of the pandemic is expected to cause a widespread increase in food insecurity. This will be felt strongly by countries that are highly reliant on tourism income, such as the Pacific Small Island Developing States (SIDS). Due to the remote location of these SIDS, sustained investments in improving the collection and analysis of quality data will be necessary to inform more efficient and effective responses to COVID-19 and related challenges at the country level.</p> <p>Despite such challenges, global agri-food systems have proven remarkably resilient in the face of COVID-19, supported by platforms such as Agriculture Market Information System to improve market transparency. COVID-19 has underscored the importance of predictable and rules-based international agricultural trade for assuring food security and economic prosperity for farmers globally. In tandem, local and regional food systems with strengthened short value chains where there is a focus on reducing food loss and waste have also been a major contributor to food security at a local and regional scale.</p> <p>The COVID-19 pandemic has also highlighted the need for a strengthened One Health approach that recognises the interactions and interdependencies between human, animal and environmental health. Over the next biennium, this approach must guide global efforts to prevent the next zoonotic pandemic, and it will be critically supported by FAO’s partnership with the World Health Organisation (WHO), The World Organization for Animal Health (OIE) and the United Nations Environment Programme (UNEP) under the Quadripartite arrangement.</p>

	<p>Another defining feature of the next FAO biennium should be concerted efforts to improve food systems sustainability. However, not all food systems need to be radically transformed to be sustainable. Australia believes that for all Members to contribute to and benefit from sustainable food production, access to the use of different innovative production methods will be required, tailored to individual countries' unique circumstances, including climate, biodiversity and production environments.</p> <p>There are no one-size-fits-all solutions to food systems challenges, and any new approaches must be not only appropriate to national contexts and priorities but also informed by scientific evidence. The normative and standard setting work of FAO will play a key role in informing effective and actionable food systems policies over the next biennium.</p> <p>Australia looks forward to working with FAO on the important themes we have highlighted above, including through sharing of knowledge and Australian expertise coming from programmes such as the Agriculture Stewardship Program, which will form an integral part of transforming strategy to action.</p>
<p>Switzerland (Fri 21/05/2021 3:45 PM)</p>	<p>Switzerland supports “Agriculture Food Systems Transformation: From Strategy to Action” as the Biennial Theme for the 2022-23 biennium.</p> <p>The Theme increases the focus not only of the 42nd Session of the Conference but also of the Governing Bodies and their intersessional work on the priorities and strategic global issues contained in the Strategic Framework where the transformation to more efficient, inclusive, resilient and sustainable food systems is at the heart of all strategic actions. The Theme equally relates to the UN Food Systems Summit 2021 that places the transformation of food systems centre stage in order to significantly accelerate progress towards the achievement of Agenda 2030.</p> <p>The topic expresses a determination of the Organization to transform the way our food is produced and consumed today in order to accelerate the shift towards more sustainable and resilient food systems. The transformation of food systems will be achieved:</p> <ul style="list-style-type: none"> • through a systemic and holistic approach that takes into account all socio-economic and environmental aspects; • by working in multi-stakeholder partnerships, as challenges are complex and systemic and cannot be dealt with in a top-down and linear way; • by promoting all innovations especially co-creation of knowledge, farmer-to-farmer innovations and prioritising systemic approaches such as Agroecology and; • by putting young people as key agents of change in the transformation towards sustainable food systems at the centre of actions. <p>For FAO to work in tight, efficient and synergetic interaction with relevant UN organizations and in the spirit of the United Nations development system (UNDS) Reform.</p>
<p>Brazil (Mon 24/05/2021 4:36 PM)</p>	<p>Brazil takes note of document C 2021/28, which provides the view of FAO Management on the proposed Biennial Theme 2022-23. Regarding paragraph “c” of the suggested action by the Conference, Brazil proposes that it is changed to “support FAO’s multi-pronged approach of putting knowledge into action, including in developing knowledge products, providing data and offering technical support to help countries promote agri-food systems transformation.”</p>

Brazil believes that, as a guidance on the Biennial Theme, the Conference should convey general messages, and not single out some approaches or initiatives to the detriment of other equally relevant ones.

With regard to the document itself, which is supposed to be a concept note on the Biennial Theme, Brazil believes it needs some corrections and adjustments to become more balanced and science-based. To this end, Brazil provides the following comments and suggestions:

In paragraph 33, Brazil notes that the first sentence is incorrectly quoted and calls FAO to change it. The original sentence, contained in the referred UN publication (UN, 2020, The Impact of COVID-19 on Food Security and Nutrition, page 4), is, "Globally, food systems remain a driver of climate change and the planet's unfolding environmental crisis." There is an enormous difference between being "a driver" and "the major driver". While recognizing that food systems can contribute to the global efforts against environmental challenges, according to national priorities, Brazil believes that overemphasizing this role in a disproportionate way can take attention away from other economic sectors where deep change is urgent. Brazil requests that the introductory presentation on item 15 be reviewed accordingly, as well.

In paragraph 10, Brazil appreciates the acknowledgment of the major role of fossil fuels in Greenhouse Gas (GHG) emissions and of the need to adapt agriculture and food systems to climate change impacts. However, for the sake of coherence, the topic on climate change should be under "Drivers regarding environmental systems", as it is in the Strategic Framework, not under "Systemic (overarching) driver".

In paragraphs 5 and 71, Brazil believes "certification schemes" should not be singled out as a possible solution. They can exclude smaller producers due to their high costs, generate barriers to trade and result in price rises that consumers might not be able or willing to cope with. There are many other ways to promote market access for small producers and more sustainable food systems, according to each context.

In paragraph 23, reference should be made to unsustainable patterns of consumption, especially in high-income countries, which pose an enormous burden on natural resources and GHG emissions. Moreover, carbon labelling should not be singled out in this paragraph. Although labelling is often presented as a "silver bullet" solution, it can lead to exclusion of many producers and unjustified barriers to international trade and may lead to results opposite to those intended. Complex challenges, such as fighting climate change, require partnerships between producer and consumer countries in order to address those challenges according to national legislation and realities in producer countries.

In paragraph 24, "unsustainable patterns of consumption, especially in high income countries" should be added to the list of factors that pose pressure on natural resources, along with those already cited ("population increase, urbanization and industrialization"). As mentioned by our delegation in the last FAO Council, it is unfair and unbalanced to single out developing regions such as Latin America and Africa in this paragraph, while not mentioning the historic responsibilities of developed countries for degradation of natural resources and GHG emissions. The principle of "common but differentiated responsibilities" is a cornerstone of UN environmental agreements and must be acknowledged here.

In paragraph 25, it is important to include "invasive alien species, lack of appropriate food safety measures and other factors beyond food systems" when listing elements that may contribute to the risk of epidemics. Instead of "the

	<p>increasing production and consumption of animal products", it would be more accurate to say "the unsustainable production of animal products, especially wild meat." It is important to rely on consolidated scientific knowledge and to avoid generalizations and misleading information, which may result in bias against specific products, such as meat, instead of targeting unsustainable or inadequate practices (within and beyond food chains).</p> <p>In paragraph 31, affirming that agri-food systems are the largest economic system in “planetary impact” is questionable and not science-based. In terms of GHG emissions, for instance, fossil fuels and industrial processes respond for the larger share, by far. While recognizing that food systems can become more sustainable and play a role in the global efforts against environmental challenges, according to national priorities, Brazil believes that overemphasizing this role takes attention away from other economic sectors where deep and urgent change is needed.</p> <p>FAO should avoid unclear and non-multilaterally-agreed concepts, such as "carbon footprint", "carbon food print" and “environmental footprint” (as in paragraphs 32 and 39). Those can be replaced with "GHG emissions" or “environmental impacts”, as appropriate.</p> <p>In paragraph 33, there is no reference to the source of the information according to which agriculture “emits more greenhouse gases than all cars, trucks, trains, and airplanes combined.” Unless there is an Intergovernmental Panel on Climate Change (IPCC) reference to this information, it should be deleted. It is important to keep FAO documents sound and based of the best available science. Still in paragraph 33, Brazil makes reference to the sentences “The coronavirus pandemic is a wake-up call on the urgent need to transform agri-food systems. This is because COVID-19 and climate change are intimately linked. COVID-19 and other diseases are rooted in environmental change.” Brazil calls FAO to cite precise, evidence-based data from appropriate sources and to address this issue in accordance with its multi-dimensional nature, avoiding simplistic affirmations. Brazil notes that the conditions for the emergence of a zoonotic disease, and for its unfolding into a global pandemic, go well beyond food systems and the mandate of FAO. Even if many emerging infectious diseases are of zoonotic origin, not all of them become pandemics.</p> <p>In paragraph 36, Brazil cautions against the approach of overplaying the role of forests as carbon sinks in the fight against climate change. For the sake of balance, this paragraph should include reference to the need to reduce emissions economy-wide.</p> <p>In paragraph 58, Brazil notes that short value chains are not necessarily more sustainable, and asks for the deletion of such reference.</p> <p>In paragraph 63, a narrow way of evaluating "efficiency" in food production is presented, which does not address sustainability in its three pillars nor the multidimensional nature of diets. It conveys the misleading idea that fish is necessarily a better food than other sources of protein from sustainable food systems. For this reason, Brazil asks for the deletion of part of the paragraph, from “Fish are” to “280 g of feed”.</p>
<p>Indonesia (Mon 24/05/2021 7:20 PM)</p>	<p>Indonesia notes with appreciation the Biennial Theme 2022-23 “Agriculture Food Systems Transformation: From Strategy to Action”. The Theme is timely as it will be part of FAO’s contribution to support UN Decade of Action to achieve the Strategic Development Goals (SDGs). As we only have nine years left to achieve the SDG targets, our agri-food systems still need further refinement, as current estimates reported that nearly 690 million people are still hungry</p>

	<p>and the number of people that are affected by severe food insecurity are still on an upward trend. Furthermore, the COVID-19 pandemic is estimated to have pushed an additional 83-132 million into chronic hunger in 2020. However, we are unable to concur and support with the Secretariat’s opinion that our agri-food systems are the single largest driver of climate change and the planet’s unfolding environmental crises, including biodiversity loss and deforestation. We view that the environmental crises are multidimensional and links to various local, national, and international factors as well as issues including international trade. Given the world is not on track to defeat hunger and malnutrition, FAO has its strategic comparative advantage as the main UN Agency dealing with the efforts to reduce significantly the rate of hunger and malnutrition. In addition, the strategic narrative of the four betters has reflected the interconnected linkages between economic, social and environmental dimensions in the FAO Strategic Framework. In this regard, we request FAO to ensure this interconnectedness be fully reflected in the action implementation in a balanced manner. Furthermore, considering the fact that technologies and innovation will certainly help farmers and governments take full advantage of new agricultural technology, we encourage the FAO Secretariat to create an enabling environment, including through capacity building and the technical assistance programme. In summary, Indonesia encourages FAO to set priorities in the implementation and development of the Biennial Theme, “Agriculture Food Systems Transformation” which should be developed in this particular order:</p> <ol style="list-style-type: none"> i. reduce hunger, putting it back on a downward slope; ii. increase investment in rural transformation and vulnerable populations to reduce inequality, leaving no country and no person behind; and iii. transform agri-food systems to nourish people, nurture the planet, and build resilient livelihoods and ecosystems.
<p>Canada (Mon 24/05/2021 11:04 PM)</p>	<p>Canada welcomes the proposed Biennial Theme, noting the importance of tailoring approaches to sustainable food systems to the geographic and socio-economic contexts of Member States. Canada would recommend greater clarity and nuances around some of the statements asserted in paragraph 12, such as: “This commodity-dependence makes economic systems fragile and negatively impacts people’s lives”. The State of Food Security and Nutrition in the World (SOFI) 2019 states, “80 percent of the countries (52 out of 65) with a rise in hunger during recent economic slowdowns and downturns are countries whose economies are highly dependent on primary commodities for export and/or import”. Furthermore, commodity-dependency may increase the difficulty of addressing environmental and social concerns, partially because multilateral trade agreements create uncertainties. Canada would like to underline that correlation does not imply causation. There are numerous factors contributing to hunger, including conflict and climate change. The SOFI 2019 Report explains that “marked declines in primary commodity prices have contributed to economic slowdowns and downturns during the 2011–2017 period, mainly affecting countries highly dependent on primary commodity exports and/or imports.” The Committee on Commodity Problems, in paragraph 10 of the Report of its 74th Session, acknowledged “the importance of trade for contributing to the availability, accessibility and affordability of food, as well as the stability of markets and the limitation of extreme food price volatility”.</p>

	<p>Furthermore, the document unduly links multilateral trade agreements to “the difficulty of addressing environmental and social concerns”. A rules-based trading system is a critical component of ensuring access to food, but also of establishing environmental and social disciplines. In this sense, trade agreements do not create uncertainties. Quite the opposite, they create predictability. Moreover, taking domestic policy action to improve environmental and social outcomes is in no way incongruous with adhering to multilateral trade rules. The Committee on Commodity Problems, in paragraph 10 of the Report of its 74th Session, underlined “the importance of a freer, fairer, predictable, and non-discriminatory, rules-based multilateral trading system, under the World Trade Organization (WTO) and consistent with its rules, for promoting agricultural and rural development and contributing to achieving food security and improved nutrition for all”.</p> <p>We find footnote 7 somewhat misleading. It quotes from The State of Agricultural Commodity Markets (SOCO 2018): “Since carbon footprint is not in essence a physical part of products . . . the implications of the TBT [Technical Barriers to Trade] Agreement requirement for the equal treatment for imports of ‘like’ products remain untested”. However, this quote is actually preceded by the following in the SOCO 2018 Report: “If a country were to require that all domestic and imported products be labelled on the basis of their carbon footprint – since labelling is required for both domestic and imported products – this would seem to be in line with the national treatment provisions of the TBT Agreement.”</p> <p>A hypothetical scenario not yet specifically tested does not change the fact that these multilateral agreements decrease uncertainties as they layout clear disciplines to follow. In this case, the key element is whether these measures are deemed necessary to meet a legitimate objective and whether the measures are more trade-restrictive than necessary to achieve those objectives.</p> <p>We believe gender should be further strengthened in the formulation of this theme to ensure that it is effectively mainstreamed throughout the four betters and the Programme Priority Areas. Specifically, the central role of women in sustainable food systems, and the role of gender equality in achieving the Sustainable Development Goals should be reinforced in paragraph 17.</p> <p>In paragraph 34, Canada would welcome an explicit reference to the link between biodiversity loss and the need for more support and involvement of Indigenous Peoples as stewards of biodiversity.</p> <p>In paragraph 41, Canada requests the mention of the need for inclusive and gender sensitive data, and would suggest the following addition: “It is critical that technology, innovations, and data are inclusive and gender-sensitive, [add: continuously monitored for gender-related impacts], and are used to spur development”.</p>
<p>The United States of America (Tue 25/05/2021 12:18 AM)</p>	<p>The United States of America supports the proposed Theme on Agriculture Food Systems Transformation. The agriculture sector is the backbone of developing economies and has the greatest potential to reduce poverty. Agricultural transformation does not just benefit the farmer; everyone stands to benefit. Transforming agriculture by making the sector more productive and efficient is key to achieving lasting inclusive economic growth. In the process of generating more income for everyone across the food system, agricultural transformation encourages more participation in markets, greater access to and affordability of nutritious food, stronger resilience and more jobs both in and out of agriculture.</p>

	<p>At the same time, the United States emphasizes that the end goal must be on alleviating hunger, poverty, and all forms of malnutrition: transforming agri-food systems to be more sustainable across all three pillars – social, economic and environmental – is a means to that goal. Simply referring to food system transformation as the end goal does not correctly identify the major challenges that we must overcome in the 21st century.</p> <p>Ending global hunger requires solutions beyond just the farm. While we agree agriculture and food systems can be improved, the United States recognizes the critical role that these systems play in sustainable development and the importance of taking a systems approach for comprehensively assessing trade-offs and identifying pathways towards more sustainable systems. We encourage FAO to continually evaluate its programmes for progress across the three dimensions of sustainable development against measurable outcomes on food security and nutrition, food safety, food affordability and accessibility, farmer income and wellbeing.</p> <p>We also urge FAO in its pursuit of innovative and creative partnerships, especially with the private sector, in transforming agri-food systems. These partnerships and implementation of FAO’s recent Private Sector Strategy (2020) can help address long-standing challenges faced by all agricultural producers in developing countries, as well as small-, medium- and large-scale food systems actors, and amplify FAO’s ability to improve food security, especially among the most vulnerable.</p> <p>Strong, well-functioning markets connect farmers and fishers to business opportunities and ensure families can get safe, nutritious and affordable food year-round. In times of crises, including during the current pandemic, global trade helps countries to combat hunger, food insecurity, and malnutrition. With access to innovative tools and approaches, farmers can increase agricultural productivity, embrace adaptations to climate change, increase their incomes and improve sustainability in food systems.</p> <p>The United States sees valuable opportunities to build more sustainable, resilient food systems, while also addressing the exacerbating effects on hunger, of conflict, the COVID-19 pandemic and climate change.</p>
<p>Japan (Tue 25/05/2021 9:02 AM)</p>	<p>Japan welcomes the Biennial Theme 2022-23 of "Agriculture Food Systems Transformation: From Strategy to Action". On the other hand, with respect to the concept note of the Biennial Theme, as mentioned in the Report of the 166th Session of the Council on the Strategic Framework 2022-31, Japan underlines the importance of digitalization in agriculture food systems with appropriate protection of data privacy and intellectual property rights and requests to add "Recognizing the importance of digitalization in agriculture food systems with appropriate protection of data privacy and intellectual property rights", at the beginning of the digitalization paragraph in the concept note.</p>
<p>Cuba (Tue 25/05/2021 9:52 AM)</p>	<p>Cuba apoya la nueva visión de la FAO con el objetivo de impulsar las “cuatro mejoras”: una mejor producción, una mejor nutrición y un mejor medio ambiente a fin de contribuir a una vida mejor, está a tono con la política de nuestro país, de producir más con menos, reducir los precios de los alimentos y el riesgo de epidemias, utilizando la tecnología y la innovación.</p>

<p>Argentina (Fri 28/05/2021 11:50 AM)</p>	<p>En primer lugar, en el marco de la Conferencia la Argentina reafirma en términos generales lo señalado en diversas oportunidades, incluyendo en el 166° Consejo de la FAO, respecto de que el foco debe estar en promover y fortalecer sistemas alimentarios sostenibles en sus tres dimensiones: económica, social y ambiental.</p> <p>En este sentido, el grado de transformación dependerá de la instancia en que cada sistema se encuentre por lo que se debería evitar realizar generalizaciones, dado que no se puede aducir que todos los sistemas son insostenibles. La necesidad de "transformación" debería resultar de un análisis de cada contexto específico, lo que dependerá, además, de las prioridades y capacidades nacionales. En consecuencia, LA Argentina hubiera preferido como tema bienal un lenguaje más exacto y apropiado, y tener en cuenta las particularidades de cada caso, pues de lo contrario esta idea de transformación radical de los sistemas puede convertirse en un slogan vacío de contenido.</p> <p><u>Comentarios particulares:</u></p> <p>Respecto al documento C 2021/28, titulado "<i>Transformación de los sistemas alimentarios agrícolas: de la estrategia a la acción</i>" se señala lo siguiente:</p> <p>Se observa que el párrafo 10 relativo al cambio climático se encuentra bajo el título <i>Factores sistémicos (generales)</i> cuando debería estar bajo el apartado de <i>Factores relativos a los sistemas ambientales</i> en consonancia con lo expresado en el Marco estratégico para 2022-2031 (documento C 2021/27, página 10).</p> <p>En los párrafos 5 y 71 se hace referencia al concepto de "<i>sistemas de certificación</i>". Al respecto, cabe señalar que nuestro país ha llamado la atención respecto a las posibles barreras "<i>de facto</i>" de acceso a los mercados que podrían generar ciertas certificaciones, más aún teniendo en cuenta los costos adicionales que podrían derivarse para los pequeños productores rurales. Cualquier medida de certificación debería ser compatible con las normas de la OMC.</p> <p>En el mismo sentido, en el párrafo 23 se hace referencia a que <i>el etiquetado de carbono podría ayudar a conformar las preferencias de los consumidores y contribuir así a la transición hacia una economía con bajas emisiones</i>. Este tipo de conceptos genera preocupación por lo cual debería eliminarse la citada frase, ya que podría eventualmente incentivar la adopción de medidas en frontera relacionadas con el contenido de carbono de los productos, cuestión que podría no ser consistente con las reglas de la OMC y sobre la cual no existe un acuerdo multilateral al presente.</p> <p>Tras la lectura del párrafo 24, se observa un desequilibrio al señalar que regiones en desarrollo como América Latina y África como generadores de la degradación de los recursos naturales y las emisiones de GEI y no se menciona las responsabilidades históricas de los países desarrollados. Por ello, es dable recordar <u><i>el principio de responsabilidades comunes pero diferenciadas</i></u>, por el que los países desarrollados deben asumir la responsabilidad histórica de la degradación ambiental que han causado, y teniendo en cuenta sus mayores capacidades financieras y tecnológicas para asistir a los países en desarrollo en el logro del desarrollo sostenible, en línea con los principios de Río reafirmados en la Agenda 2030.</p> <p>En el párrafo 25 se señala al "<i>aumento de la producción y el consumo de productos de origen animal</i>" como una de las causas de epidemias y degradación de los ecosistemas. Por otro lado, en el párrafo 31 se afirma que <i>los sistemas agroalimentarios constituyen el mayor sistema económico del mundo en términos de [...] impacto planetario</i>.</p> <p>Al respecto, estas expresiones –que no tienen sustento científico– resultan confusas y pueden llevar a generalizaciones y afirmaciones erróneas, por lo cual deberían eliminarse.</p>
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Por ello, se destaca la importancia de que las medidas que los países adopten se diseñen sobre sólida evidencia científica, en línea con las reglas multilaterales de comercio, ya que afirmaciones como esta pueden resultar en sesgos infundados contra productos tales como la carne, en lugar de apuntar a prácticas insostenibles específicas.

A su vez, afirmaciones de ese tenor no contemplan el aporte de nutrientes que brindan muchos productos de origen animal, incluidas las carnes rojas, contribuyendo a mejorar significativamente la seguridad alimentaria y la nutrición en muchos países en desarrollo productores de ganadería, y coadyuvando a erradicar el hambre y la malnutrición (ODS 2, Agenda 2030). De igual manera, la ganadería cumple una función económica fundamental en muchos sistemas de producción de alimentos, proporcionando ingresos, riqueza y empleo y, en consecuencia, contribuyendo a erradicar la pobreza (ODS 1, Agenda 2030).

En cuanto al párrafo 26 del documento citado, cabe recordar que no existe acuerdo a nivel internacional en relación al concepto de "economía azul", por lo que se desconoce su sentido, alcance y potenciales impactos en términos comerciales. Asimismo, la Agenda 2030 no incluye este término ni de manera general ni tampoco en el Objetivo de Desarrollo Sostenible 14 referido a "Conservar y utilizar en forma sostenible los océanos, los mares y los recursos marinos para el desarrollo sostenible".

Por tales razones, nuestro país ha expresado reparos con respecto a este concepto en todos los foros multilaterales pertinentes, inclusive en la FAO, en particular debido a la falta de claridad respecto de sus implicancias y a que el mismo pueda ser utilizado como justificación para la eventual adopción de medidas comerciales (paraarancelarias).

En tal sentido, se sugiere reemplazar la referencia "economía azul" por "economías oceánicas inclusivas y sostenibles" ("sustainable and inclusive ocean economies"), que constituye lenguaje acordado en el marco de la FAO en ocasión de la adopción de la Declaración de Pesca y Acuicultura Sostenible.

En los párrafos 32 y 39 se hace mención a conceptos que no están acordados multilateralmente, y que podrían ir más allá de las reglas de la OMC, tales como "huella de carbono" o "huella medioambiental", por lo cual se sugiere su eliminación.

En el párrafo 33 se expresa que *los sistemas agroalimentarios son el principal factor (the major driver) responsable del cambio climático y de la crisis medioambiental que atraviesa el planeta*. Al respecto se sugiere mantener el lenguaje señalado en el documento *The Impact of COVID-19 on Food Security and Nutrition (Naciones Unidas, Junio 2020) que habla de que globally, food systems remain a driver of climate change and the planet's unfolding environmental crisis*. Por lo tanto, se debería adoptar la siguiente redacción: *los sistemas agroalimentarios son un factor responsable del cambio climático y de la crisis medioambiental que atraviesa el planeta*. Por ello, se debería tener en cuenta asimismo de modo balanceado la contribución a la contaminación ambiental de otros sectores -como el energético y el industrial-, evitando penalizar al sector agropecuario por sobre otros.

Por otro lado, en el mismo párrafo se realizan afirmaciones sin hacer referencias a una sólida evidencia científica. En efecto, expresiones tales como *la agricultura [...] emite más GEI que todos los coches, camiones, trenes y aviones juntos o la pandemia de la COVID-19 representa una clara advertencia sobre la imperiosa necesidad de transformar los sistemas agroalimentarios*, no tienen ningún sustento científico, por lo cual deberían eliminarse.

Con respecto a la referencia a "transformación azul" incluida en los párrafos 44 y 62 del documento, se desconoce su contenido y alcance por lo que resultan aplicables los comentarios previos sobre la "economía azul", incluidos en el párrafo 26 *ut supra*.

En el párrafo 58 se habla de que *las plataformas de comercio electrónico pueden aprovechar los vínculos de mercado, acortar la cadena de valor alimentaria*. Al respecto, no se considera pertinente la promoción únicamente de cadenas cortas (también llamadas locales y regionales) de suministro de alimentos con la excusa de que generan menores pérdidas y desperdicios o que generan resiliencia. La longitud de la cadena en sí no determina dichos factores. Por el contrario, en muchas ocasiones las cadenas denominadas largas (relativas al comercio internacional) permiten aprovechar las complementariedades en las producciones nacionales y suplir dificultades o carencias locales, incluso las relacionadas con el acceso a alimentos nutritivos y de calidad.

El párrafo 63 transmite una idea engañosa de que el pescado es mejor alimento que el pollo, al cerdo y a la carne de vacuno. Además, esta afirmación atenta contra la producción de esas carnes, las que también contribuyen a una dieta variada y nutritiva, y al logro de la seguridad alimentaria, por su alto contenido proteico de vitaminas y nutrientes.

Por otro lado, el comercio de alimentos variados cumple un papel importante en tanto contribuye al desarrollo de los medios de vida de vastas poblaciones que de él dependen, genera ingresos para los que trabajan a lo largo de las cadenas alimentarias y favorece el desarrollo rural y el arraigo.