

CFS Policy Convergence Process on Sustainable Agricultural Development and Livestock

Comments from Brazil

General Comments

- * Brazil supports the existence of a chapeau to introduce the recommendations and the context in which they were approved. Also, some introductory remarks on the importance of livestock for FSN in the context of the Agenda 2030 for Sustainable Development and the right to food would be appreciated;
- * Recommendations should be concise and more practical, but also reflect the balance of issues present in the HLPE Report;
- * Recommendations should focus on the role of livestock for SAD and FSN and refrain from making comparisons with foods from different sources (e.g. fish and pulses);
- * Recommendations should NOT specify for which stakeholders they are addressed to (e.g. for States/IGOs/etc.)

Specific Comments

- * **Recommendation 5** (“Better integrate SAD issues for FSN in trade policies”):

- o Item c – We suggest the following language for *item c*: “Consider all relevant dimensions of SAD in the development and implementation of standards for animal-sourced foods and livestock feed, that are evidence-based, consistent with International Law and do not represent technical barriers to trade”;

- * **Recommendation 7** (“Protect, preserve and facilitate the sharing of livestock genetic resources”)

- o There is need for replacing the word “sharing” in the title for “access to”, since the common used language for this issue is, as seen in item c, “facilitate access to genetic resources and promote the sharing of benefits derived from their utilization”

- o Item d – we suggest the deletion of this item for the following reasons: * The Report does not go deep into the protection and managements of animal genetic resources, which is mentioned only in a very general manner; * The recommendation is not consistent with the wording present in Page 92 of the HLPE Report, under the heading “Protect and manage genetic resources”. * It is not clear which “objectives” it refers to and therefore the recommendations depends on others (all recommendations should stand alone); * FAO has an appropriate forum to discuss issues related to conservation, sustainable use and access and benefit-sharing of genetic resources for food and

agriculture, which are the Commission on Genetic Resources for Food and Agriculture and its intergovernmental technical working group on animal genetic resources.

o A new recommendation should be included to recognize and strengthen the work of existing international platforms and initiatives regarding this issue, such as the Global Plan of Action for Animal Genetic Resources for Food and Agriculture (2007), the Interlake Declaration, among others.

* **Recommendations 11 and 12** are too market-oriented and should not lose sight of the importance of livestock in ensuring FSN for smallholders as well as of the realization of their right to food.

* **Recommendation 14** (“Address the specific challenges of intensive livestock system by”)

o Item d) – it is not clear which private sector initiatives the recommendation is referring to, so we suggest the deletion of the reference or a more general reference to all initiatives on animal health and welfare that could be considered.

o Item e) – Brazil is of the view that references to antimicrobial resistance in the CFS recommendations should be consistent with the language agreed in the relevant fora, in particular the WHO plan of action on antimicrobial resistance and the World Organization of Animal Health standards. Within those frameworks, measures related to AMR control, including phasing out of antimicrobial medicines, are subject to scientific evidence and risk assessments. Brazil does not favor general references to reduction of antimicrobial uses that are not based on sound scientific evidence and risk analysis principles. Therefore, we suggest the following language for item e) “Implementing Resolution 4 of the 39th FAO Conference of 2015 as well as other existing international recommendations, guidelines and standards related to antimicrobial resistance prevention and control measures in livestock production, adopted within the tripartite collaboration between FAO, WHO and OIE.”