

General Comments:

- While the IPES-Food panel welcomes the improvements in the draft, we suggest strengthening the language of the recommendations. This could be achieved by including regulatory means or specific policy proposals, to effect and enforce the changes proposed.
- Regarding the formulation of recommendations, we suggest avoiding to conflate all the actors together, as this risks obscuring responsibilities and accountabilities. Addressing specific recommendations to specific actors would be more straightforward and clear.

Comments to specific sections:

- 1.f. : The need to create a level-playing field for agroecology through policy reform, has been highlighted in the HLPE report 14 (pp. 93-117). This recommendation is crucial and should be strengthened with concrete regulatory means to be achieved. Subsidies to the industrial agricultural model (that lead to negative externalities) should be structurally redirected towards agroecological approaches. See Recommendation 2 in IPES-Food (2016). From uniformity to diversity: a paradigm shift from industrial agriculture to diversified agroecological systems (p. 69). http://www.ipes-food.org/_img/upload/files/UniformityToDiversity_FULLL.pdf
- 1.j : "Ensure that small-scale food producers have access to the natural resources (e.g. land)" change to "Ensure that small-scale food producers have access to *and control over* natural resources (e.g. land, *seeds*)". The footnote could also refer to UNDROP.
- 1.k : "Promote" change with "*respect, protect, fulfil*".
- 1.m : Include concrete policy examples, such as integrated food policies. See IPES-Food (2020). The added value(s) of agroecology: Unlocking the potential for transition in West Africa (pp. 105-107). http://www.ipes-food.org/_img/upload/files/IPES-Food_FullReport_WA_EN.pdf
- 2.a: Emphasize that the metrics and indicators should be holistic and multidimensional. See Recommendation 1 in IPES-Food (2016). From uniformity to diversity: a paradigm shift from industrial agriculture to diversified agroecological systems (p. 68). http://www.ipes-food.org/_img/upload/files/UniformityToDiversity_FULLL.pdf
- 3.d : "[...] in accordance with the International Treaty on Plant Genetic Resources for Food and Agriculture and the Convention on Biological Diversity;" add "*in accordance*

with the rights established under the ITPGRFA and CBD and ensuring that these rights are not undermined by other policies or laws”.

- 3.g : "optimize the use of pesticides" change with *"reduce the need for pesticides"*. In addition to this point it could be added a specific recommendation on the need to regulate agrochemical production and use, hold the developers accountable and liable, and enforce polluters-pays principle.
- 3.h: "Promote" change with *"respect, protect, fulfil"*.
- 3.i: "optimize the use of synthetic fertilizers" change with *"reduce the use of synthetic fertilizers"*.
- 3.n : Shift the focus of this recommendation to support territorial markets, related infrastructures, and small scale producers access to markets.
- 3.o : Strengthen this point with more concrete recommendations. See for example recommendations 1-4 in IPES-Food (2020). COVID-19 and the crisis in food systems: Symptoms, causes, and potential solutions. http://www.ipes-food.org/_img/upload/files/COVID-19_CommuniqueEN%283%29.pdf
- 3.s: This recommendation could be strengthened by including the need to ensure that structural inequities, ownership and issues of access and control are addressed; rights are protected; risks are adequately addressed.
- 4: This section would benefit from more focus on the knowledge of Indigenous peoples and small scale producers, and ways to support, recognise and protect these.
- 4: The section could also mention safeguards, and equitable benefit sharing in the use of traditional knowledge.
- 4: The section could include bolder recommendations on the need for the general redirection of agricultural research towards agroecology. Key recommendations in this regard can be found in Biovision Foundation for Ecological Development & IPES-Food (2020). Money Flows: What is holding back investment in agroecological research for Africa? Biovision Foundation for Ecological Development & International Panel of Experts on Sustainable Food Systems http://www.ipes-food.org/_img/upload/files/Money%20Flows_Full%20report.pdf
- 4.e : Include the recommendation for Governments to separate sales from farm advisory service.