General Remarks:

• We welcome the overall structure keeping the 5 main blocks of recommendations from the HLPE report. However, the titles of the recommendations should better reflect the language as contained in the HLPE report recommendations.

• We take note that the longer this process to develop policy recommendations takes, the further away the content is from the HLPE report and its recommendations.

• The size of Draft One, including the extensive preamble, followed by the policy recommendations is far too long for being user-friendly and implementable.

• Compared to HLPE report the set of recommendations has increased in size without obvious added value in terms of 1) clarity and feasibility for the potential users of the recommendations and 2) impact. These policy recommendations will never allow to achieve the much needed transformation of the current food system towards sustainability and the SDGs.

• The differentiation between agroecological approaches and other innovative approaches could be improved. The preamble does not sufficiently explain agroecology in all its dimensions and misses to analyse comparative advantages to other “innovative approaches”. The concept of agroecology is very weakly present in the draft recommendations.

• A human rights based approach and especially the Right to Food should become more prominent throughout the document.

• The role of small-scale food producers as drivers of innovation for centuries should be better highlighted in the context of innovation.

• The key reference to ecological footprint has been unfortunately weakened compared to HLPE e.g. “Promote the use of ecological footprint in order to ensure that the ecological impacts of consumption, and the effect of current production on future capacity to produce, are adequately factored into assessments, continuing to refine calculation methods as appropriate” instead of “recognize the importance of improving the ecological footprint of food systems as an operational principle for transitioning to SFSs”

• In several recommendations, several actors (states, private sector, research, food producers’ organizations, CSOs etc.) are thrown together. This leads to a confusion of responsibilities of specific actors, which are not explicitly mentioned. Several recommendations therefore fall short of ensuring accountability by duty holders to the rights holders.
• Recommendations directed to CFS for example in relation with the development of a comprehensive performance measurement and monitoring frameworks (rec. 2 a)) should carefully be analyzed in the context of the mandate of CFS. FAO or others, including e.g. CGIAR could be better positioned to deliver such a task.

• Reference to the need to increase responsible investment by all relevant stakeholders at all stages of the food system should be strengthened.

• We doubt if an annex with definitions is needed.

• Some important outcomes and recommendations from HLPE report have disappeared
  • Recommendation for CFS to further discuss and develop “agency” as the 5th pillar of food security.
  • Diluted and insufficient reference to the centrality of “transition resp. transformation” in the preamble. E.g. no reference to the 5 levels of transition.
  • Reference to the 13 agroecological principles (HLPE Report Table 1). Para 8 as only reference in that context is rather confusing.
  • Recognition of the importance of true cost accounting for negative as well as positive externalities.
  • Reference to market-related aspects, particularly entrepreneurship e.g. “incentives for young entrepreneurs”.
  • Reference in the preamble to the principle of “no “one-size-fits-all” solution to realizing the transformation of food systems globally required to achieve food security and nutrition (FSN). It will require supporting a diversity of transitions from different starting points, along different pathways, adapted to the local conditions and challenges faced in different places by different people”

Our interventions during the informal meetings and our various submission in the context of the process of the elaboration of Draft One remain valid.

We look forward to further contribute in more detail to that important CFS process during the upcoming negotiations.