**Comments from the European Union on "CFS Policy Convergence Process on *Agroecological and Other Innovative Approaches"***

1. There is a large positive feedback from colleagues consulted on the document shared. It is giving a good state of play in the domain of Agroecology and other Innovative Approaches.

2. While the report recognizes that there are "*emerging efforts to define which agricultural practices are agroecological or not*", we would have expected a recommendation to intensify the efforts to identify and document in different agri-ecosystems those practices. This would be the starting point in the different regions of the world for promoting sustainable farming practices.

3. **Other innovative approaches**: We consider that the **HLPE report on Agroecological and other Innovative Approaches** provides a good and in-depth analysis. As other FAO member expressed during the last CFS, we do recognize that the report focuses very much on agroecological approaches and their future transformation (agroforestry and circular agriculture) and **it is less focused on other innovative approaches**. It is important to make sure that we are not favoring any specific approach over another especially in the framework of the debate on the need to transform our food systems. Therefore, we call **CFS to further develop the focus on the other innovative approaches**. In our view, innovative approaches could be scaled up in the recommendations, as innovation can play an important role in transition to more sustainable food systems.

4. **Performance metrics**: As several FAO members referred during the discussion at the last CFS, we should stress the importance that FAO - as a global knowledge organization – establishes **performance metrics of agriculture and food systems** as a basis for environmental, social and economic assessment, policy implementation and investment decisions. This is particular important for allowing a serious debate on the contribution of each type of farming system in the transformation of food systems.

5. **Agroecology definition**: We cannot ignore the fact that the HLPE clearly concludes that there is "**no single, consensual definition of agroecology shared by all the actors involved, nor agreement on all the aspects embedded in this concept**" and that "**there is no definitive set of practices that could be labelled as agroecological, nor clear, consensual boundaries between what is agroecological and what is not**". In the specific framework of the CFS convergence policy process, we would recommend the to use a careful terminology (i.e. avoiding "agroecology" since we do not have a definition), such as "agroecological approaches" and, in the absence of an international agreed definition for agroecology, to agree on criteria or principles as way forward in accordance with the content of points 4 and 6 of the HLPE Summary (p.14).

6. Agroecology will be a simple combination of agri-environmental operations or will become a new ambitious farming system? The interaction among the 10 elements of Agroecology produced by the FAO and the 13 innovative principles of Agroecology proposed in this Report is unclear (page 160).

7. "There is no single, consensual definition of agroecology shared by all the actors involved" reflects the reality but is diverging the attention from the fact that existing definitions of

agroecology go in the same direction, and that core principles, especially for what concerns the agronomic aspect, are shared. Therefore, the report should strengthen this point, and regroup information that is scattered across points 4, 6, 7, 11 (pp.14-15).

8. Flexibility, addressed in point 9 (p.14), is a strength, and as such should be presented. This is probably the main reason why there is not an agreed **list of practices**. Enhancing natural processes to support productivity on the long term can only occur by adapting the practices to the local environment and not vice versa. Drawing a detailed list will be the product of experience. Initially it should be possible, and efforts should be made in this direction, to define set of practices (see for example Wezel et al., 2013).

9. The report tends to present agroecology and innovation as two separate pathways. This is not always the case, as scaling up of agroecology needs innovation for example in machinery, i.e. for non-chemical weed management, direct seeding and/or transplanting on non-tilled and mulched soil.

10. **Avoiding confusion and overlapping between Organic farming and agroecology**: Although the HLPE classifies both organic and agroecology as approaches under the category of "*agroecological and related approaches*" (p.63), it important to clearly distinguish the two concepts. At EU level as it is the case in many countries in the world, the organic farming has since years a well-defined regulatory framework.

11. **Coherence between CFS and FAO work**: it is important to make a coherent link between the work of FAO and CFS on the subject. So, we call both CFS and FAO (i.e. the "ten elements of agro-ecology"). Furthermore, as others mentioned at the CFS, the discussion on agroecology approaches needs to be broaden not reducing it only to crops.

12. Under the **Transition pathways towards sustainable food systems (**see bullet point 1, page 4**)**, the summary and recommendations extracted from the report highlights that Agroecology is more a disciplinary fields that includes several components from production to **consumption**. From our view, talking about consumer supposes also to tackle food market issues. However, there are no inputs related to market failure.

13. **Incentives** are pointed out under the **Design of institutional environments that support transitions towards SFSs (**see bullet point 30, page 9**).** On one hand, the document is not clear enough on the sustainability of the process as incentives mean that someone has to pay/support this kind of measure. On the other hand, redirecting **subsidies and incentives** that at present benefit unsustainable practices, to support transition towards SFSs.

14. The issue of pesticides is widely addressed in the report, but there is hardly any conclusion about it. It would be worth mentioning that in a perspective of reducing the use of pesticides, a viable alternative is to strengthen biological pest control. This is one of the main characteristics of a fully operating agroecological system: becoming pest resistant at the point that pesticides are no longer needed.

15. The role of knowledge should be highlighted: local knowledge, horizontal spread of knowledge, co-creation of knowledge; on this point, concerning research, this is also needed to support the

agronomic part on e.g. pest and disease control techniques; allelopathy; enhancement of soil biodiversity etc.

16. **The cost of transition** (from conventional agriculture to Agroecology) is clearly discussed in the document. How much cost to change the paradigm? Who is going to support this cost? Etc...
    It is important to recognize the importance of **true cost accounting for negative as well as positive externalities** in food systems and take steps to effectively implement it where appropriate.

17. Under the **Design of institutional environments that support transitions towards SFSs (**see bullet point 37, page 10**)**, the forgotten crops are again not mentioned while they are important in terms of healthy diet and facing sustainability issues including adaptation to climate change.

18. **Investment in research**: While the HLPE acknowledges the fact that there has been less much investment in research on agroecological approaches than other innovative approaches, we would like to highlight the EU support to research and innovation activities under Horizon 2020 and EIP as well as the plans for Horizon Europe for stepping up research activities on the application of ecological processes to agricultural production systems. From the research perspective we think that the focus should be placed on a better understanding of the contribution of agroecological practices to helping farming systems attain the three pillars of sustainability – social, economic, environmental - for which there is clearly demand. This is particularly interesting in view of the EU future policy developments (e.g. new CAP, Green deal, Farm to Fork, high climate ambitions, etc.).
19. Establish and develop effective technology transfer mechanisms to enhance the adoption of technologies in agroecological and other innovative approaches by farmers/producers and other stakeholders involved in various stages of value chains of food commodities.

20. **New concept of Agency**: As expressed by the EU at the CFS, we believe that the new concept of "agency" suggested by the HLPE as a fifth pillar of FSN needs to be further discussed before considering any amendments to the internationally agreed definition of FSN.
    It would be relevant to understand clearly the benefit of adding a new pillar to a concept which is already complex enough. The main issue is not to add a new pillar but to be sure that a clear measurement methodology will follow!
21. Develop/use relevant **performance metrics for food systems** that consider all environmental, social and economic impacts of food production and consumption.

22. The role of actions such as decreasing food waste, decreasing losses in processing, increasing access to food in the narrative of feeding the world could be shifted more to the forefront

Comments consolidated on 6th December 2019
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