

**POLICY RECOMMENDATIONS ON AGROECOLOGICAL AND
OTHER INNOVATIVE APPROACHES FOR SUSTAINABLE FOOD
SYSTEMS THAT ENSURE FOOD SECURITY AND NUTRITION**

PSM comments on Zero Draft

General comments, including introductory paragraphs.

1. The PSM welcomes the opportunity to provide feedback on the CFS '*Policy recommendations on agroecological and other innovative approaches for sustainable food systems that ensure food security and nutrition zero draft*' which contributes to bringing forward the objective of sustainable food systems. The PSM believes that the policy recommendations capture relevant policy questions and actions to enhance food security and nutrition in the context of the social, environmental and economic dimensions of sustainability. In order to enhance food security and nutrition it is important to address these dimensions in an integrative manner and be aware of important synergies and trade-offs.
2. The PSM and its members, ranging from small farmers, cooperatives, SMEs and corporations continue to value the role of CFS and its multi-stakeholder engagement process as the forum to engage as a stakeholder, providing experience, evidence and solutions. Collaboration, partnership and dialogue at international, regional and national level remains key for the development and use of sustainable agricultural practices and systems to address FSN goals. It remains important to recognize the role of partnership and multi-stakeholder engagement moving forward with these Policy Recommendations and the role of CFS is facilitating this.
3. The Zero Draft rightly (para 3) notes that 'innovative approaches are required to bring about food system transformations'. The HLPE Summary and Recommendations is subsequently quoted but we would suggest the Zero Draft includes a broader quotation and reference (to para 12 of the Summary) and include the statement that "Innovation refers to the process by which individuals, communities or organizations generate changes in the design, production or recycling of goods and services, as well as changes in the surrounding institutional environment".

4. Similarly, para 4 and 5 refer to innovative approaches and while the FAO Conference Resolution 7/2019 is referred to, one of the key statements made (and repeated in the Ten Elements paper) is missing. This was highlighted for inclusion by PSM both at the Open Day event and in written comments: “Agroecology *is one approach, among others, to contribute to feeding sustainably a growing population and support countries in achieving Sustainable Development Goals and coexists with a broad range of sustainable agricultural approaches that can contribute to meeting the challenges facing farmers and food systems*”. This should replace, or be added to, the last sentence of paragraph 5.

5. PSM recognizes the diversity in approaches to farming and the variety of techniques (tools) farmers have at their disposal is crucial for the sustainability of food systems. It enables farmers and farming to adapt to ever changing conditions. As the Zero Draft notes, there is no one size fits all.

6. However, in the preceding paragraphs (4-7) the introductory discussion is not completely clear about the distinction between approaches and technologies in farming. This distinction is important is because different technologies can be valuable for different farming systems or approaches (a point PSM believes New Zealand made in its written comments). Different technologies provide a ‘toolbox’ of interventions that can be used by every farmer regardless of the farming system or approach. PSM recommends to make a clear distinction between approaches (agroecology, regenerative agriculture, agroforestry and organic agriculture) on the one hand and techniques and practices (e.g. biotechnology, ecosystem restoration, digitalization and precision agriculture) on the other.

7. This distinction has been recognized by the UN General Assembly who (December 2017) formally supported the need for convergence of all the available technologies and their use in integrated solutions that are able to address local needs and societal requirements: *"Recognizing the need to further enhance the linkages between agricultural technology and agroecological principles, such as recycling, resource use efficiency, reducing external inputs, diversification, integration, soil health and synergies, in order to design sustainable farming systems that strengthen the interactions between plants, animals, humans and the environment for food security and nutrition, enhance productivity, improve nutrition and conserve the natural resource base, and attain more sustainable and innovative food systems"*. (General Assembly resolution Dec 2017 <http://undocs.org/A/C.2/72/L.33/Rev.1>).

8. Regardless of the system or approach a farmer uses, the farmer needs access to the necessary tools or practices. The sustainability of every farming system or approach (agroecological, organic or conventional) is depended on the ability of farmers to solve the challenges farmers face. All farmers need seeds,

ecosystem services (pollination, soil health, and natural pest control), water, nutrients, decisions support, mechanical, physical, agro-chemical or biological intervention methods, etc. to build resilient and sustainable farming systems or approaches.

9. As highlighted in previous written comments and verbal statements PSM recommends a fuller discussion of digitalisation and other ongoing innovations. The Zero Draft is intended to be a set of policy recommendations for agroecology and 'other innovations' but remains limited on innovations. This is of concern when it is noted that the FAO Conference (Resolution 7/2019) has already requested FAO to assist countries and regions towards sustainable agriculture and food systems by: "Encouraging innovation in agriculture, *inter alia*, through the utilization of relevant and context adapted technology and tools - including ICT and biotechnology". The Zero Draft should, in exemplifying the role of CFS, further develop these ongoing initiatives, as introduced by the HLPE Report.

10. The HLPE Report itself notes that "On a global scale, modern biotechnologies are *de facto* part of the transition towards sustainable food systems because they are already a significant component of the agricultural systems of a number of countries". While agroecological approaches should indeed be considered a necessary component of sustainable food systems, these approaches are readily complemented through the use of modern biotechnology, correctly regulated. Sustainable examples of this include hybrid seed technology that offer greater resilience to climate and soil conditions, allowing farmers to grow food on otherwise unproductive land. Access to higher quality seeds and crop technologies allows farmers a viable pathway (and cognizant of labour/capital constraints) to enter their goods into local/national agriculture market, and to benefit from that financially as a result.

11. Para 6 Digital agriculture: PSM has previously highlighted the breadth of evidence and experience of digital agriculture for all farmers that "is" happening now, as well as what "can" happen (para 6). Recommend to insert in 2nd to last sentence "farmers at all scales" so it reads, "Digitalization can support farmers at all scales especially smallholders in improving their resource management and competitiveness." For example, blockchain technology (as FAO's own programmes in Vietnam livestock marketing, in conjunction with Government) indicate, provides increasing transparency and more information to consumers on where food comes from and how it is produced. This provides further opportunities with regards to farmers' access to markets. While para 7 highlights the negative issues raised by the concept note of the proposed International Digital Council it would be useful to include positive aspects of improved access to and use of data on soils, climate data (rainfall patterns), production and price variability that "is" happening now.

Specific comments on Recommendations

I. Lay policy foundations for transforming food systems to ensure sustainability and enhance food security and nutrition through agroecological and other innovative approaches

12. The HLPE Report addressed Recommendation 1 to “All stakeholders involved in food systems (including: States, local authorities, intergovernmental organizations (IGOs), civil society and the private sector, research and academic institutions)”. It is not clear why the Zero Draft only refers to “States”, which fails to build on and develop the multistakeholder partnerships and roles of all CFS stakeholders. PSM recommends to use both the original title and the stakeholders involved in food systems for this and ALL OTHER Recommendations.

13. Para 10: The HLPE Report (recommendation 1 b) recommended all stakeholders to “use relevant performance metrics for food systems that consider all environmental, social and economic impacts of food production and consumption”. This was included in the Rapporteur’s Summary: Need for clear data and performance measurements to assess the impact of transitioning to sustainable food systems. The new phraseology introduced that simply refers to “impact assessment findings” should be replaced with the original text.

14. Para 11: It will also be important that all stakeholders, in promoting innovations that are sustainable, also acknowledge the need for policies to be in place to openly promote and incentivize innovations that support sustainable agricultural transformation. This could include, for example, new plant breeding techniques, which would bring needed benefit to the environment, ecosystem services, food loss waste etc. This also requires emphasis on the economic dimension of sustainability which help to drive change towards the envisioned outcomes: economic incentives for improving farmers’ prosperity and their families and for people and institutions to invest in such systems transformations. This is particularly important for youth’s engagement.

15. As indicated by the Swiss National FAO Committee, (Agroecology as a means to achieve the Sustainable Development Goals’, February 2019), many agroecological systems have a high initial demand for labor and can be more labor intense in general, transaction costs can be high for market and processing opportunities. Agroecological systems can result in a reduction of yields that needs to be compensated by cost savings, higher product prices or other support measures in order to ensure the economic viability of the farms. Economic sustainability needs to include food security and food accessibility at affordable prices.

II. Support transitions to diversified and resilient food systems

16. Para 19: The text concerning Biodiversity in the Rapporteur's Note was more focused and concise than the 5-line complex sentence now proposed. While PSM recognizes the importance of all the individual elements captured in paragraph 19, is concerned that integrating all these elements into one system or approach could lead to the loss of diversity of existing systems themselves. I.E. This level of prescription might reduce diversity. There are many ways to improve the sustainability of farming systems, depending on the context of the farming systems. Favoring natural processes and biological interactions for soil fertility, soil water, crop protection and productivity is one approach only. From a sustainability perspective, other approaches, tools and practices should be included. Therefore recommend to delete "favouring" in line three and replace with "including".

17. Para 21: PSM would propose the following text for the paragraph: "Recognize the enormous contribution that family farmers have been making to the effective use and conservation of genetic resources by affirming core principles expressed in the texts of the International Treaty on Plant Genetic Resources for Food and Agriculture and the Convention on Biological Diversity, without limiting any rights that farmers have to save, use and exchange farm-saved seed/propagating material, subject to national law and as appropriate".

18. In addition, it remains important that farmers of all sizes have a choice of the seed that best meets their needs and have access to all varieties (local, commercial, developed by the public or private sector). A supportive innovation framework, e.g. as expressed in UPOV Act 1991 (The International Union for the Protection of New Varieties of Plants), contributes to the increased number of varieties available to farmers around the world. Without this, limited innovation would occur, ultimately impeding farmers' ability to adapt to the challenges of: climate change, water scarcity, sustainable management of arable land.

19. Paras 24-26: An additional paragraph under 'sustainable healthy diets' is suggested to further develop consumer knowledge and choice: "Support producers and consumers to make more informed choices and access local markets more rapidly and efficiently by promoting lower cost, comprehensive, supply chain transparency and traceability mechanisms".

20. Para 28: PSM recommends to insert "all scales of enterprises, including" to read: "Support all scales of enterprises including small and medium sized ones that provide goods and services for diversified and resilient food systems."

III. Strengthen comprehensive monitoring and impact assessments to ensure that innovative approaches support sustainable food systems that enhance food security and nutrition

21. It is not clear why the title of this section, as worded both in the HLPE Report and the Rapporteur's Note has been changed. The original title should be used.

22. The HLPE Report highlighted that: "Comprehensive performance metrics, covering all the impacts of agriculture and food systems, are a key requirement for rational decision-making" (para 34, Summary).

23. The HLPE Report Recommendation (5 a), recommended that 'States and IGOs, in collaboration with academic institutions, civil society and the private sector, should': "develop practical, scientifically grounded and comprehensive performance metrics and indicators of agriculture and food systems as a basis for assessment, policy implementation and investment decisions, including total factor productivity of livelihoods, land equivalent ratio multifunctionality of landscapes and ecological footprint of food systems, as well as impacts on beneficial organisms, dietary diversity and nutritional outcomes, women's empowerment, income stability and employment conditions, as appropriate".

24. The PSM notes that this Recommendation and text was broadly endorsed by participants during the Open Day event, as captured in the Rapporteur's Summary. It is not clear why new text has been developed that only refers to 'assessment of impact' with no reference to any of the previous text in the Recommendation e.g. "practical, scientifically grounded and comprehensive performance metrics and indicators of agriculture and food systems".

25. PSM recommends the text of Recommendation 5 a) be reinserted.

26. Apart from basic production and efficiency indicators there is a need to measure GHG emissions efficiency through amount of GHG emissions produced per unit of output produced. Furthermore, in order to measure farm level contribution to sustainable practices, data (already being collected through on-farm surveys and censuses and used for accreditation schemes of environmental outcomes of regenerative agriculture), can monitor the number of hectares of farmland with:

- Minimal soil disturbance and sequestered carbon;
- Permanent soil cover;
- Crop rotations;
- Buffer strips to reduce soil erosion; and,
- Water (incl. infiltration rates) and nutrient management.

IV. Strengthen support for research, training and education and reconfigure knowledge generation and sharing to foster co-learning

27. The HLPE Report had originally focused this, needed, Recommendation on: States and IGOs, in collaboration with academic institutions, civil society and the private sector. It appears this multi-stakeholder approach has been withdrawn with only 'public research institutions' included. PSM recognizes the value of a multi-

stakeholder approach to this recommendation and requests the original breadth of participation be included.

28. The HLPE Report, Recommendation 3 a), recommended stakeholders should: “increase investments in public and private research and development, and in national and international research systems to support programmes in agroecological and other innovative approaches, including to improve technologies”.

29. This remains a key recommendation and should be included in the Zero Draft, section IV.

30. Paras 34/36: Previous PSM comments on the Rapporteur’s Note indicated that: “When promoting the role of agricultural heritage and local knowledge it is recommended to use the agreed language of Principle 7 of the RAI which respects cultural heritage and traditional knowledge but also “supports diversity and innovation”.

31. In addition, the Rapporteur’s Note, 1 c), with regard to strengthening co-creation of knowledge had included the phrase, “including scientific innovation”, which has now been deleted. This should be reinserted (para 36).

32. Para 40: PSM recognizes the need to strengthen public research on the actual impact of the use of agrochemicals. This should include the monitoring of responsible use and risk assessment practices.

33. Para 44: in line with the original HLPE Recommendation, should read “Increase responsible investment by public, private and foundations institutions in research and development towards.....”

V. Strengthen stakeholder engagement, empower vulnerable and marginalized groups and address power inequalities in food systems

34. PSM agrees with the comments of the EU and France not to add ‘agency’ as a pillar of FSN.