

Dear CFS Secretariat,

We appreciate the preparation of the inputs to contribute to the HLPF, within the framework of the invitation received from ECOSOC.

Before making our comments, with your indulgence, we would like to suggest that, given that we will not be able to follow the official procedure outlined in paragraph 96 of the MyPOW, and due to time constraints to discuss the content of the document, we would like to propose that the inputs and contributions of the CFS be made through a "summary of the Chair" or in a text in which it is clarified, for example with a disclaimer, that the recommendations do not necessarily reflect the opinion of all the members.

In this way, we could speed up the preparation of the document and avoid delays in its presentation.

Please find below our comments on the draft document:

A.- Introduction:

We note the inclusion of the diagram that refers to 6 dimensions of food security, where there is the addition of two new dimensions, namely "Agency" and "Sustainability". Although we understand the value of the proposal, we believe that the definition of the concepts has not yet been agreed upon at the multilateral level; which creates difficulties for us to understand the scope of these terms. Beyond the HLPE proposal, we think that prior to including them as official CFS inputs, this issue deserves a discussion and, eventually, the agreement of the members.

Likewise, in this section, it would seem pertinent to include a paragraph that mentions the importance of global food trade to strengthen food security in the context of COVID19. Thus, we propose the following language:

Open trade complements domestic production in ensuring and supporting global food security. No single economy can lay claim to full self-sufficiency [footnote]. We all rely on international trade for key components of our diet, and for access to inputs, machinery, and services that allow us to produce safe and affordable food. Trade facilitates access to food during local production shocks and across different production seasons and acts to prevent domestic shortages. Trade also leads to a more efficient and sustainable allocation of factors of production, such as land and water resources. Under open market conditions, agricultural supply chains can adapt to occasional and temporary challenges. Without predictable agricultural and food trade, we would all be significantly worse off.

[footnote] Only 17% of countries produce more calories than they consumed between 2005-2009 and even those countries relied on trade to ensure a varied and nutritional diet. (M.J. Puma et al Environmental Research Letters January 2015)

B.- Recommendation 1:

Bullet 1: mention of international purchases should be included, as local purchases do not always meet food needs.

Bullet 5: we suggest the inclusion of “as well as safe water and basic sanitation service” at the end of the sentence.

C.- Recommendation 2:

It would seem appropriate to temper the statement about the potential for transmission of COVID19 in certain industries and food facilities. In this regard, there is no conclusive scientific evidence in this regard and, besides, there are examples of good practices that have made it possible to avoid infections that could be mentioned or, at least, indicated references throughout the section.

D.- Recommendation 3:

The content of the first bullet should be replaced by the following sentence:

Encourage restraint and live up to their commitments, to ensure all emergency measures in response to COVID-19 are targeted, temporary, proportionate, science-based where relevant, and transparent – including by informing and notifying all relevant COVID-19 related measures as soon as practicable to the WTO Secretariat, without prejudice to domestic food security, consistent with national requirements. The international community must continue to respond to the COVID-19 food security threat by ensuring open and predictable agricultural markets, which will result in market-based price signals and preserved supply chains.

Another option could be the following phrase:

Eliminate all the agricultural trade and production distortive measures, including agriculture production subsidies, import tariffs and non-trade barriers (sanitary and technical).

In addition, it is worth remembering that according to the reports of the main international organizations (WTO, OECD, UNCTAD, International Trade Center, IMF, and World Bank) distributed within the framework of the G20, to date, there has been no "generalized process" of adoption of restrictions on agricultural exports against COVID-19 that lead to an impact on food prices.

Second bullet: the reference to the term “ecological boundaries” seems to us inappropriate since it is a term that has not been agreed upon multilaterally. Furthermore, this mention unbalances the three pillars of sustainable development, namely: economic, social, and environmental. Therefore, we would like to recommend the removal of the concept.

E.- Recommendation 4:

In bullet 2, the importance of creating a “task force” in the CFS is indicated. We would like to understand what would be the nature of such a group, how the activity would be financed, and who would be part of this group. We believe that it would be more appropriate to enforce synergy between the RBAs to meet this objective, without creating new structures.

Bullet 3: FAO has created a series of online tools that collect official data on the impacts of COVID19 in local and national contexts. Consequently, we believe that it would not be practical to duplicate platforms or databases in the CFS.

For example, we can mention:

- 1.- Analyses and solutions in a period of crises - COVID-19 Pandemic: (<http://www.fao.org/2019-ncov/analysis/en/>)
- 2.- Policy briefs: (<http://www.fao.org/2019-ncov/resources/policy-briefs/en/>)
- 3.- FAO recommendations on planting and harvesting tasks during the COVID-19 outbreak using crop calendars (<http://www.fao.org/2019-ncov/covid-19-crop-calendars/en/>)

Bullet 4: regarding the concept of “nutrition-sensitive practices”, we do not know its meaning and scope and we understand that it is a term that would not have been endorsed at the multilateral level. Therefore, we suggest that it be replaced by: “food security and nutrition policies”.

F.- Recommendation 5:

We believe that the title would be unbalanced as it emphasizes short supply chains, to the detriment of medium or long chains, without strong evidence to support the claim. We suggest modifying it by including medium and long chains.

Likewise, the term "territorial markets" is not an agreed concept, in addition to promoting a purely local approach, which is detrimental to different possibilities of distribution and supply.

Bullet 1: we would like to request the following reformulation, in line with the comments made previously:

"Invest in enhanced DISTRIBUTION SYSTEMS, INCLUDING IN infrastructure, at the regional, national and local levels."

Bullet 2: We would like to understand the meaning of the term "unjustifiably privilege formal retail markets". Does the phrase refer to incentives or subsidies that can distort its

operation or to other types of measures? We would like clarification on this point so that our technicians can analyze the phrase.

Consequently, we propose the following wording:

"Carefully review policies IN ORDER TO ADDRESS THE RELEVANCE OF informal markets that provide points of connection between small producers and lower-income consumers, including periodic rural markets and street vendors."

Bullet 3: we would like to understand the scope of the concepts "Stronger Regulation" and "Competition Policy". In any case, to clarify that the proposed measures will not create obstacles to trade, the phrase "in accordance with agreed multilateral WTO rules" should be added.

Otherwise, we would like to propose the following wording:

"Consider adopting regulations to empower small and medium agrifood enterprises (SMEs) to participate in national, regional, and global supply chains, AS WELL AS THROUGH MECHANISMS THAT ENCOURAGE AND STRENGTHEN SUSTAINABLE PRODUCTION AND DISTRIBUTION CHAINS IN THE MEDIUM AND LONG TERM".

G.- Recommendation 6:

While we understand the importance of agroecology as an agricultural production approach, we think it would be appropriate to include other approaches such as conservation agriculture, smart agriculture, or no-till farming. The idea is that the recommendations are plural and inclusive, without highlighting one mode of production to the detriment of others.

Based on what has been explained, we would like to request that the wording of the recommendation be formulated as follows:

Title: Support THE DEVELOPMENT OF resilient AND SUSTAINABLE food

Bullet 1: Invest in agroecological AND OTHER INNOVATIVE APPROACHES research-action projects AND PROVIDE PUBLIC POLICY TOOLS TO PROMOTE THE SCALABILITY OF THE SCHEME.

Bullet 3: BUILD ON THE EXPERIENCE OF agricultural development assistance projects THAT support conventional or industrial agricultural approaches, AS WELL AS work to support AND INTEGRATE projects that encourage agroecology and other sustainable forms of agriculture.

Bullet 5: Ensure sustainable fisheries and aquaculture, as well as animal production and forestry, are integrated into policy responses to COVID-19 so as to reap their full potential in terms of nutrition and livelihoods, FOLLOWING THE GUIDELINES OF THE ONE HEALTH INITIATIVE, THAT INTEGRATES HUMAN AND ANIMAL HEALTH AND THEIR INTERFACE WITH THE ENVIRONMENT.