Oxfam input for the consultation on the HLPE V0 draft report on "Sustainable Agricultural Development for Food Security and nutrition, including livestock – 12th of November 2015

This report is a critical element of next year work of the CFS on a very timely issue were much more action and more policy convergence are needed. It is also clear that business as usual or small adjustment of the current agricultural and livestock system is not going to be enough to achieve the right to adequate food and to ensure the whole food system is sustainable and climate resilient.

The draft report is very comprehensive and touches on a wide range or critical issues, it provides globally a good balance between the focus on sustainable agriculture and livestock (= our question to question 1 of the consultation) and includes a number of positive elements. However, there is significant room for manoeuver to improve it. Among others: some important challenges are missing (see below our answer to question 5); agroecology is almost completely absent of the report (just referred to once in the whole document – p.19), clearly underestimating its importance and relevance for meeting sustainability challenges of agricultural and food systems (see in particular our answer to question 12); and the recommendations section does not include some important elements while including some problematic measures on the other hand (see our answer to question 12 as well).

Hereafter we’ll focus our input to questions 2, 5 and 12 raised by the HLPE team:

2. The report is structured around context, trends, challenges and pathways/responses. Do you think that these are comprehensive enough, and adequately considered and articulated? Does the report strike the right balance of coverage across the various chapters? Are there important aspects that are missing?

A. In terms of the context, one important trend is missing: despite the growing consensus that has emerged on the need for proceeding to major changes in agricultural and food systems in order to ensure that the world can feed itself, today and in the future, with healthy and nutritionally high-quality food, while contributing to eradicating poverty, preserving biodiversity and natural resources, mitigating and adapting to climate change in a resource-constrained world, reinvestment efforts in agriculture since 2008 have been channelled into a slightly modified version of the Green Revolution. In other words, despite nice rhetoric over the need to shift the industrial agrifood system to a truly more sustainable paradigm, reinvestment efforts in agriculture are still further consolidating that system/model, which has clearly failed to feed the world, while being responsible for nearly half of the world’s human greenhouse gas (GHG) emissions, for strengthening social inequities among actors in the whole agrifood supply chain, and for further polluting and depleting natural resources among others. On the other hand, despite the massive existing body of evidence demonstrating how efficient scaling-out and up agroecological approaches would contribute to ensuring sustainable and resilient agricultural and food systems today and in the future, these approaches remain poorly supported.

This huge contradiction has been recognized by different actors. See for example:

B. Some important challenges are missing. See our answer to question 5 below.

5. The report has identified a wide range of challenges likely to be faced in the coming period to which policy makers and other stakeholders will need to take into account so that SADL can contribute to FSN. Do you think that there are other key challenges/opportunities that need to be covered in the report, including those related to emerging technologies, the concentration and intensification of production in livestock, and the implications for feedstuffs (crops and oilseeds), and international trade?

There are indeed important challenges that so far are not included in the report, and that should be considering their importance. Here are at least 3 challenges which would deserve a specific focus in the report:

A. The need to increase significantly land productivity through agricultural approaches that are globally labor-intensive in countries whose economies are highly dependent on the agricultural sector

First, in terms of the “productivity” debate, the draft report favours a reductive and simplistic approach consisting in focusing narrowly on the concept of “yield”, while it is much more relevant to talk about “land productivity” (concept that is used only once in the draft report – p.34). Indeed, the concept of “yield” is a narrow one for measuring productivity since it focuses on measuring only the production per unit area of one single crop (like “metric tons of corn per hectare” for example), instead of allowing measuring the total output per hectare: all that is produced per unit area, which is captured by the concept of “land productivity”. The mainstream, almost systematic use of “yields” instead of “land productivity” in agricultural debates has important implications, notably when it comes to providing relevant data to inform decision making processes. This can sometimes lead for example to design agricultural policies that support large-scale monocultures instead of diversified small-scale farming systems, based on the fact that the yield per unit area of the one crop that is grown in monoculture will be higher than within a small-scale diversified farming system (which by the way is not necessarily true). But we forget that diversified small-scale farming systems produce usually much more things on the same unit of land (through intercropping, crops rotation, integration with livestock, etc.). As a result, the land productivity of those systems is much higher. And in terms of the Food Security and Nutrition debate, and considering land scarcity, it is much more relevant to consider the total output that is produced per unit area, thus land productivity, than to consider only the output measured for one single crop (through the concept of yield).

⇒ On the difference between “yield” and “land productivity” and its implications, see for example: Rosset P.M., 1999. The Multiple Functions and Benefits of Small Farm Agriculture In the Context of Global Trade Negotiations, Food First (Institute for Food and Development Policy).

Then and more importantly, in terms of the productivity challenge, it is important to stress that in countries whose economies are highly dependent on the agricultural sector, the challenge is not just increasing yields / land productivity (while of course addressing as well other sustainability challenges to make agricultural -and food systems- more sustainable today and in the future: preserving biodiversity and natural resources, addressing climate change challenges etc.), but to do it through agricultural approaches that must necessarily be globally labor-intensive, in other words through approaches which have a relatively low productivity per worker. In these countries (which are mainly poor countries), where the agricultural sector remains the only sector that can realistically employ the majority of people, promoting agricultural approaches that would induce a fast increase of the productivity per worker would
generate massive unemployment, rural and urban poverty. This does not mean that the productivity per worker does not need to increase in these countries as well (it is effectively the case), but this needs to be progressive and in consistence with the pace of development of other sectors of the economy, on a case by case basis (otherwise you just generate indeed massive unemployment, rural and urban poverty – e.g. if promoting a massive and brutal mechanization of agriculture).

As such, this challenge is not properly taken into account in the draft report: indeed there is no development emphasizing the need to increase yields / land productivity through approaches that are globally labor-intensive.

B. The need to secure small-scale producers’ access to and control over natural and other productive resources

As agroecology teaches us (notably as a science, which has allowed theorizing the conditions to which sustainability of agricultural – and increasingly food systems as a whole – can be improved – those principles being the so-called “agroecological principles”), making agricultural and food systems more sustainable relies among others heavily on:

- Primarily mimicking natural processes, thus creating beneficial biological interactions and synergies among the components of the agroecosystem;
- Building on existing farmers, traditional and local knowledge and know-how (while combining it with modern agroecological science), recognizing the phenomenal sustainability that traditional peasant farming systems have demonstrated throughout the ages, and as a corollary of the treasures of knowledge they represent for achieving sustainability today and in the future, notably in the context of climate change;
- Bottom-up dissemination and innovation processes in which farmers take the front seat in developing context-specific solutions.

As a consequence, successful transitions aiming at making agricultural and food systems more sustainable require securing small-scale producers’ access to and control over natural and other productive resources: land, water and other natural resources, as well as seeds. When farmers’ access to and control over seeds are threatened, their flexibility to design sustainable farming systems that are adapted to their particular needs and to the specificities of each local context, is undermined. Farmers’ adequate access to and control over land, water and other natural resources is also essential, firstly because peasants need to be able to mobilize resources to develop adequate strategies and practices for increasing sustainability. Moreover, improved security of tenure is also important for encouraging farmers to invest in the long-term sustainability of the environment (e.g. through the planting of trees, the more responsible use of soils and other practices with long-term payoffs), since they will be more motivated to take care of the land and other natural resources their livelihoods depend on if they can be ensured they won’t lose them to industrial or urban developers of large scale agricultural business.

So far, the challenge of ensuring adequate access of small-scale producers’ access to and control over land, water and natural resources, and seeds, is almost completely missing in the draft report: access to land is just mentioned twice (p.9 and 12), while access to seeds is not mentioned even once. On the contrary, this should be acknowledged and should receive specific attention. For good reason: no way successfully transitioning existing agricultural and food systems into more sustainable ones will be possible without addressing this challenge…

⇒ For more development on the importance of securing small-scale producers’ access to and control over natural and other productive resources, see for example Oxfam-Solidarity discussion paper Scaling-up agroecological approaches: what, why and how?, January 2014 (notably p.63 and 64).
C. The need to democratize agricultural and food governance

At the risk of sounding ideological, ultimately, the majority of obstacles to the scaling-out and up of truly more sustainable agricultural (and food) approaches are a result of a democratic deficit in relevant decisions making bodies. Throughout the world, to various degrees depending on the scale and region considered, decisions that shape agricultural and food systems are indeed disproportionately influenced by vested interests of a minority of actors to the detriment of the general public interest, of sustainable development and of the fundamental rights of a majority of populations. These actors are the proponents as well as the beneficiaries of the current corporate agro-industrial food system. They include ‘traditional’ actors of the agri-food value chains such as global food retailers, food processors, commodity traders, the pesticide or transgenic industries. They also include other actors, not active or traditionally active in food and agriculture, such as pension funds, companies in the automotive industry, or oil companies, who can exert a strong, indirect influence on various policies that directly or indirectly shape the dynamic of the agri-food system, be they agricultural, energy, trade, or financial policies. These actors invest considerable means to protect their particular interests against any decision that may threaten them.

Democratizing decision-making processes and in particular increasing the active participation of small-scale food producers in decisions that affect them and shape agricultural and food systems is a crucial challenge. This is a key stepping-stone for truly overcoming obstacles for more sustainable agricultural and food systems. Active participation of small-scale producers, and especially women, must be ensured at local, regional (subnational), national and international levels. Real participation is crucial to ensure that all relevant policies are truly responsive of the needs of vulnerable groups and for empowering them. Public authorities have a major responsibility in taking strong actions for dismantling the disproportionate market power of those using their influence to highjack and format agricultural and food systems to serve their own private interests.

For now, as such, this challenge is missing in the draft report, also certain (very few) text passages do refer indirectly / implicitly it to some extent (e.g. second paragraph of p.41, second paragraph of section 4.5 in page 67, or some recommendations calling for an effective participation of all actors / inclusive processes). This is not enough. Given its importance this challenge deserves a specific focus / development in the report, and there should be consistent recommendations to help addressing it, focusing on the need to increase in particular the participation of the most vulnerable and marginalized (see below our point on recommendations in our answer to question 12 of the consultation).

For a bit more analysis on the issue, with concrete examples of the corporate influence over the food and agricultural system, see for example part III, section E., sub-section 2 (“Democratizing decision-making processes”) in Oxfam-Solidarity discussion paper, Op.cit.

6. A decision-making approach that could be useful for policy makers in designing and implementing policies and actions has been proposed in Chapter 4 of the report. Is this a useful and pragmatic approach?

This approach is useful indeed, but should be further developed. This is the only place where the report stresses a bit more the importance of the transition process itself (how to design and put in practice the best context-specific solutions in a given context) for achieving greater sustainability, while the quality / coherence of the transition process is key, and should receive much more attention in agricultural and food systems development than it currently receives.

All too often, in agricultural debates the challenge of sustainability of farming systems is still essentially reduced to the identification of “good practices”, as if it was possible to identify a few magic bullet solutions that would be independent from the environment to which they apply and
could be disseminated following top-down approaches for achieving sustainability. However, agricultural sustainability is not about intrinsic characteristics of a few magic bullet solutions that are divorced from local contexts and can be disseminated following top-down approaches. It relies on the quality of complex interactions that result from an entire package, adequate combination of various practices whose operationalization in particular circumstances will necessarily have to change depending on each context, since each environment has its own characteristics and conditions to achieve sustainability. Depending on how it is concretely applied and completed or not by other practices, one particular technique (e.g. no-till) can sometimes either be an active component of a truly sustainable farming system, or on the contrary contribute to non-sustainable impacts.

Agroecology has a strong added value in this regard. As an agricultural approach, agroecology could be defined as a holistic transition process aiming to make agriculture economically, ecologically and socially more sustainable by realizing to further degree agroecological principles (understood as those on which sustainability depends, as theorized by agroecology as a science). As a process of transition towards more sustainable agricultural systems, agroecology consists therefore essentially in designing and applying an adequate strategy for managing the transition, one that can improve sustainability in the particular context considered, through means that are adapted to local conditions. Designing such strategy requires meeting certain conditions, including:

- Proceeding to a comprehensive diagnosis of sustainability challenges and conditions specific to the given context. This diagnosis requires a holistic approach. This notably means the following:
  - All relevant aspects of sustainability, whether linked to food security, environmental protection, and/or community well-being, must be taken into account, recognizing the multi-functionality of agriculture;
  - All human and environmental constraints, and the ways through which those elements interact with each other, as well as all assets (natural, social, human, physical and financial) locally available, must be identified;
  - Expected benefits in the short, medium and long term must be defined;
  - The need to go beyond the level of the plot or the farming system, as well as to thinking in terms of collective actions, thus requiring coordination between different actors.
- Building primarily on functionalities given by the ecosystems. Indeed, realizing agroecological principles consists primarily in mimicking natural processes, thus creating beneficial biological interactions and synergies among the components of the agroecosystem. It must notably lead to minimize the use of non-renewable inputs that cause harm to the environment or to the health of farmers and consumers. However, agroecological farming does not exclude the use of chemical inputs. It rather seeks to reduce the use of all off-farm inputs (chemical or biological) to an absolute minimum;
- Ensuring a farmer-led, bottom-up approach. Agroecological farming is knowledge-intensive and based on techniques that are not delivered top-down but developed on the basis on farmer’s knowledge, experimentation and innovation, combined with modern agroecological science, thus leading to a co-construction of knowledge.

These conditions are all essential variables to take into account for optimizing the chances to find the best possible context-specific solutions for improving sustainability in the particular context considered.

As such, instead of looking primarily on techniques, agroecology rather precisely invites us to focus on the coherence / quality of the transition process itself for achieving greater sustainability. If the process is coherent (i.e. following key conditions such as those described above), then it should lead in principle to the most adequate combinations of practices in the particular context considered (at least, this represents the best way to optimize chances to increase sustainability in
a given context). Moreover, this would minimize trade-off in the context considered, since the various priority sustainability challenges, in such a process, will have been properly identified. On the other hand, neglecting the importance of the transition process itself by focusing too quickly and narrowly on practices, at best leads to sub-optimal solutions, and at worst to further increase the sustainability crisis.

In synthesis, as agroecology teaches us, ensuring a coherent transition process is more important for achieving greater sustainability (through ad hoc context-specific solutions) than focusing too quickly on techniques.

While the draft report includes some consideration of the importance of the transition process itself through its section 4.5 indeed (“Approach to policy decision-making and actions”), it should go much further in addressing this. And it could do so by building on / taking useful inspiration from agroecology as a science and as a holistic agricultural approach.

For more information, see Oxfam-Solidarity discussion paper, op.cit. See in particular Part 1, section D (pp.19-28). The discussion paper is backed by numerous references for further information.

12. Are there any major omissions or gaps in the report? Are topics under-or over-represented in relation to their importance? Are any facts or conclusions refuted or questionable? If any of these are an issue, please send supporting evidence.

Here we’ll focus on 2 issues:

- Agroecology as a major gap in the draft report;
- The recommendations section.

A. Agroecology as a major gap in the draft report

As mentioned in the introduction of this document, agroecology is almost completely absent of the report, clearly underestimating its importance and relevance for meeting sustainability challenges of agricultural and food systems. Maybe this is partially due to a misconception / misunderstanding of what “agroecology” or “agroecological approaches” is / are. Therefore, as a starting point, it is worth clarifying the concept. Then we’ll explain why it should be mainstreamed in the draft report.

A.1. Clarifying the concept

Agroecology is far from being one set, or even a few sets, of nice agricultural practices which could substantially help increase agricultural sustainability but only in a few very specific, limited contexts. It is a federative concept of actions, intermediate between the following three key dimensions: agroecology as a scientific discipline; agroecology a holistic agricultural (and increasingly food systems) approach; and agroecology as a social/political movement. In short:

- As a scientific discipline, it is basically the science of sustainable agriculture, and increasingly food systems as a whole. Originally based on the re-discovery of traditional small-scale farming systems, as mentioned above the practice of this scientific discipline has allowed and is further allowing the theorization of the key conditions to which sustainability can be increased. Those conditions are the so-called “agroecological principles” (whose theorization is an ongoing exercise although there is a large consensus on five ‘historical’ principles – e.g. increasing the recycling of biomass and achieving a balance in nutrients flow, assuring favourable soil conditions, or minimizing nutrients losses from the system, through relatively closed rather than open system design). As a science, agroecology represents the best effort ever made to understand how sustainability works, at which conditions it can be improved. This is a big added
value compared to other “sustainable agricultural approaches”, such as “sustainable intensification” or “climate smart agriculture”, which per se are not scientifically grounded;

- As an agricultural approach (and the approach tends to be increasingly expanded to food systems as a whole), agroecology can be defined as a holistic transition process aiming to make agriculture economically, ecologically and socially more sustainable by realizing further agroecological principles, through multiple context-specific combinations of strategies and practices that are designed, applied and managed primarily by farmers themselves. In that sense, it is everything but a simple “catalogue of techniques”. It is more a kind of broad methodology to guide us for achieving greater sustainability. One very important element to understand in this regard is the fact that this methodology is basically applicable in all contexts, since there will be always some room of manoeuvre for improving sustainability (or mitigating negative externalities) in any given context. In other words, the so-called “agroecological principles” have universal applicability. But the technological forms through those principles can be made operational depend on the prevailing environmental and socioeconomic conditions at each site;

- As a social movement, agroecology essentially seeks to increase small-scale farmers’ and consumers’ autonomy and control over agricultural and food systems, for realizing ‘Food Sovereignty’, understood as “the right of peoples to healthy and culturally appropriate food produced through ecological sound and sustainable methods, and their right to define their own food and agricultural systems” (Nyeleni Declaration, 2007). Increasing small-scale farmers’ autonomy vis-à-vis industrial agri-food system can notably be considered as a necessary condition for ensuring a real shift towards more sustainable agricultural and food systems.

⇒ As mentioned above, for more information on what agroecology is, see for example Oxfam-Solidarity, op.cit. In particular Part 1, section D (pp.19-28) which provides a more comprehensive explanation, and Annex 1 (78-80) which includes a synthesis of the concept based on its three key dimensions. The analysis is based on a comprehensive list of credible bibliographic resources.

A.2. Why agroecology deserves much more attention in the draft report?

There are a number of very good reasons why agroecology / agroecological should be mainstreamed in the report or at least have a strong specific focus in the report (including it terms of recommendations):

Firstly, as demonstrated by a massive body of evidence, it can make a huge contribution to achieving food security and nutrition, and the realization of the Right to Adequate Food, as well as to achieving other key sustainability challenges of today and the future:

- Contributing to food security and nutrition, and the realization of the Right to Adequate Food: (1) by enhancing yields / land productivity substantially (availability of food) through solution that are globally labour-intensive while allowing a progressive increase of the productivity per worker in countries whose populations largely depend on agriculture for their livelihoods (see related developments in answer to question 5 above); (2) by boosting urban agriculture (availability of food); (3) by reducing poverty (accessibility of food); and by ensuring the adequate character of food (adequacy of food);

- Contributing to water security and the realization of the Right to Water and Sanitation ⇒ though improving water use efficiency or productivity. This also in return contributes to food security and nutrition and the realization of the Right to Adequate Food (in particular thanks to the significant yields / land productivity increases resulting from higher water productivity and its expected positive economic impacts);

- Preserving biodiversity and natural resources. Realizing agroecological principles indeed allow avoiding overexploiting and contaminating land and water resources, restoring degraded lands or enhancing soils fertility by increasing SOM, fostering diversification
which occurs in many forms (genetic variety, species, structural) and over different scales (within crop, within field, landscape level)…;

- **Increasing resilience to climate change and addressing the mitigation challenge.** The increase of resilience through agroecological transitions results from: (1) increasing the level of biodiversity; (2) building healthier soils; (3) improving water management and water harvesting in rainfed regions; and (4) optimizing yields / land productivity increases. Those 4 dimensions / levers can be considered as key conditions for better adapting agriculture to climate shocks. As to the mitigation challenge, in particular, transitioning industrial agriculture to more agroecological farming systems could significantly contribute to mitigation, since agroecological farming is highly efficient in sequestering carbon. More importantly, scaling-out and up agroecological transition processes would not only allow addressing the mitigation challenge of the agricultural sector. It would also significantly contribute to reducing current GHG total emissions of the industrialized food system as a whole, beyond its agricultural component. This can be well explained by the work of the Ngo GRAIN, which has estimated that reduction and sequestration of one-half to three-fourths of current global GHG emissions could be achieved through adopting four complementary measures: using agroecological practices to rebuild the organic matter in soils lost from industrial agriculture; stopping land clearing and deforestation for plantations; distributing food mainly through local markets instead of transnational food chains; decentralizing livestock farming and integrating it with crop production. While each of these measures is not necessarily specific to the agroecological paradigm, applying consistent agroecological transition processes would undoubtedly lead to their adoption;

- **Increasing small-scale food producers’ control over agricultural and food systems.** Existing evidence shows that agroecological transitions lead effectively to increasing farmers’ autonomy and control over their production systems, first by reducing to an absolute minimum their dependence on off-farm inputs, state subsidies to agrochemicals, local retailers and moneylenders. Increased control of peasants also builds on the bottom-up and farmer-led methods privileged for designing and managing agroecological transition processes, as illustrated by the CaC (campesino-a-campesino - farmer-to-farmer) methodology. Such approaches allow peasants to take responsibility and control over transition processes, enabling them to share, discuss and decide on their own what they want to do. Ownership of processes by farmers depends importantly on the inherent flexibility available to them for trying out the practices on their own farms, adapting and innovating for addressing their specific problems with available resources. But agroecological transitions can also strengthen peasants’ control over food systems more broadly, through the development of alternative agrifood networks (AAFNs) such as producer–consumer networks, collective producer shops, farmers’ markets, box schemes and school provisioning schemes, as well as through and a growing influence on public policy;

- **Empowering women.** Although more information / analysis is needed at that level (lack of data), existing evidence reveals that agroecological transition processes have an enormous, inherent potential to empower women, demonstrating that when they are properly conceived and managed, they lead effectively to women’s empowerment.

For a comprehensive analysis, backed up by numerous references, of how agroecology / agroecological approaches contribute to achieve these different but complementary sustainable challenges, see Part II (pp.33-58) of Oxfam-Solidarity discussion paper, op.cit.

Secondly, there is no other scientifically grounded approach which allows developing context-specific solutions, avoiding a top-down, standardized one-size-fits-all approach. There is other approach capable of taking that much into account the specificities of each local context. This
is due to what agroecology is fundamentally in terms of a holistic agricultural (and increasingly food systems) transition process or approach, based on the best effort ever made to understand how to achieve greater sustainability. In that sense, agroecology is very inclusive, allowing identifying ways to transition extremely diverse agricultural (and food) systems into more sustainable ones, primarily through the identification of the available room of manoeuvre to do so given the specific agronomic, pedo-climatic, social, economical, cultural assets and constraints in each context.

Thirdly, as already explained above (see our answer to question 2), despite the massive body of evidence demonstrating the relevance of agroecology for addressing sustainability challenges today and in the future, it remains poorly supported, while on the other hand reinvestment efforts in agriculture since 2008 still continue to further benefit to the Green Revolution style agriculture that has led us to the current agricultural and food crisis… We have to keep in mind that global picture. This is a good reason as well for putting a better emphasis on agroecology, in order to contribute shifting a bit the huge (and abnormal) lack of today’s institutional, political and funding support to it. Although there are debates as to the centrality of agroecology for addressing sustainability challenges of agricultural and food systems. But everyone needs to recognize it is part of the solution. And that part of the solution is obviously neglected. This must change and the HLPE report could help addressing this gap.

Here is a short selection of just 10 useful resources for more information on agroecology and for better taking stock of its importance for achieving greater sustainability:


B. Inputs on the recommendations section

On the recommendations we have the following general comments:

- Throughout the report it is clear that paths toward sustainability depends greatly on the size and model of farms/livestock system. However, this differentiation is not strongly enough included in the recommendations. In order, to provide evidence based guidance, the recommendations need to be specific for the different types and size of farming.

- There is still room to be more prescriptive and specific in the recommendations and underline more precisely how they should be implemented and prioritized. It would be also helpful to make an estimate on how much it could cost the implementation of this agenda.

Comments on recommendations on cross-cutting issues:

- Consistent with our previous comments on agroecology, a key recommendation that should be included is the need to scale up agroecological approaches. As recognized in the Global Strategic Framework, agro-ecology works to increase smallholders’ incomes, resilience and sustainability. This would require policy changes and increase investments to put in place adequate supporting measures and policy environment. Some specific recommendations can be found here: https://www.oxfam.org/sites/www.oxfam.org/files/ib-building-new-agricultural-future-agroecology-280414-en.pdf

- It is key to remember governments’ commitments in relation of public investment, notably on food and agriculture, including e.g. the commitment to deliver 0.7% of GNI as ODA and the African countries commitment to deliver at least 10% of their budget to the agricultural sector as well as climate finance commitments;

- On the recommendation 1.b., it should be made clear that investments should be targeted to ensure that they benefit to small scale producers. This is a key condition to ensure they contribute to FSN;

- On the recommendation 1.d. (as well as on para 23), public-private partnerships are mentioned. However, unless we missed it, they are not discussed in the rest of the report at all. If they are included in the recommendations they should be discussed in the report and it should be illustrated how and in which conditions (who should be involved, how to ensure they do no harm, benchmarks, etc.) they can contribute to deliver SAD and FSN;

- Still on recommendation 1.d, in terms of participation of multiple actors to the design and execution of more sustainable, food and nutrition security oriented agricultural development policies, it is critical to put first and foremost the emphasis on increasing the participation of small-scale food producers in decisions that affect them and shape agricultural and food systems. As mentioned above (see our related point in our answer to question 5 above), the active participation of small-scale producers, and especially
women, must be ensured at local, regional (subnational), national and international levels. Real participation is crucial to ensure that all relevant policies are truly responsive of the needs of vulnerable groups and for empowering them. This would be a starting point for democratizing agriculture and food governance.

Comments on the recommendations on the social pillar:

- It should be much clearer the need to ensure access to all productive resources (land, water, other natural resources, as well as seeds) for all small scale food producers and ensure that the principle of Free Prior and Informed Consent is respected as a right for Indigenous Peoples and more broadly for all affected communities;
- The issue of living income is absent. May be worth to have a specific recommendation focusing on agricultural workers;
- There should be language for achieving gender equity / empowering women. Among others given their crucial role in agricultural and food production, seeds and biodiversity management, and as custodians of traditional knowledge, women’s contribution is essential for successfully transitioning agricultural and food systems into more sustainable ones (including for preserving natural resources and adapting agriculture to climate change). Among others women should be systematically involved in all relevant decision making processes for transitioning processes aiming at achieving greater sustainability of agricultural and food systems.

Comments on the recommendations on the environmental pillar:

- Addressing climate change is absolutely critical. The recommendation seems to be far too broad and not enough specific. It would be important to look on the HLPE report on climate change as well as the CFS agreed recommendations to ensure consistency. It is also critical to make a distinction between what should be the overarching priority of smallholders (food security and adaptation) and of industrial agriculture (mitigation). Carbon sequestration is mentioned in the recommendations but the related policies and incentives are not really explored in the report. What policies and programs we are referring to? Carbon markets? What limitations or potential/real negative impact they have?
- Would be interesting to have recommendations related with phosphate, probably the resource for agriculture that will run out faster. It would be very useful to have the HLPE take on how this can be addressed.

Comments on the recommendations on the economic aspects:

- Paragraph 8 does not link the whole yields / land productivity debate to the critical issue of labour productivity. As mentioned above (see our answer to question 5 above), the debate on yields / land productivity cannot be treated alone, in isolation, without addressing the question of the impacts that the approaches used for increasing them / it will have on the productivity per worker and therefore on the future capacity of the agricultural sector to provide enough employment in a given country, taking into account the pace of development of the other sectors of the economy. In other words, the recommendation should not be just to increase yields / land productivity, but to do it through approaches that are globally labor-intensive in countries where the majority of people depend on agriculture for their livelihoods (otherwise, as explained above you will generate massive unemployment, rural and urban poverty;
- Paragraph 10 doesn’t take into account that there has already been a HLPE report on biofuels and that we have already enough research on the subject and on the impacts of different biofuels. This recommendation should be made more concrete and based on the HLPE report on biofuels. Notably, it should be underlined that biofuels mandates, tariffs and subsidies should be eliminated (a recommendation supported by evidence as well as
by a very wide range of actors). It should be clearer that all biofuels policies should be assessed and negative impacts on the progressive realization on the right to food should be addressed by adequate changes in policies, subsidies and other support measures.

- Paragraph 12 is very important but it should be underlined that there is a need to address power imbalances that create highly unequal markets relationships for small scale food producers. This would require broader interventions (such as e.g. support producers organizations to transform produce) and just a focus on transparency and competition often is not enough.

- Paragraph 13 should clearly mentioned that trade related concerns should not supersede states human rights obligations notably related with the right to food. This implies that developing countries should be enabled to use effective and evidence based measures and subsidies to support small scale food producers even if they create trade distortions;

- Though p. 41, lines 4 and 8 talk about the shift in the control of food systems to corporations, the recommendations have little (or nothing that we found) about how these should behave, and what governments should do to regulate the private sector. This is a major gap in the draft report;

- There should be a recommendation on supporting (institutionally and financially) autonomous initiatives carried out by small scale food producers’ organizations and networks for scaling-out and up sustainable agriculture approaches, and especially agroecological approaches.

Health and animal care recommendations:

18.b is the only recommendation that focus on the need to reduce ASF in certain population and increase it in others. This recommendation will not be sufficient if we seriously strive to have a sustainable food system. An information campaign will not be enough to change that. Also based on the draft report (p. 25, line 35) we would expect a call for more stringent policies to cut western meat consumption. It would be important that the HLPE make concrete proposals on how to address this situation. It would be an important issue to be discussed at the CFS.

Under institutional recommendations:

- It is critical to underline the need to ensure that research bodies and institutions work with small scale food producers and through participatory research deliver on the solutions that smallholders are looking for. In fact, still too often, research is done in isolation and then “solutions” developed are not adopted by smallholders. This is another key element of the agroecological approach;

- Recommendation 23 should put primarily the emphasis on fostering greater engagement of small-scale food producers in the design and implementation, AND MONITORING, of relevant decisions / schemes. Again, they are the ones that are generally excluded and whose participation should be strengthened.