

CSM Preliminary Comments on HLPE Livestock Recommendations – July 31 Submission

#	HLPE Proposal	CSM Comments and Proposals
	<p>The following recommendations have been elaborated building upon the main findings of the report on Sustainable agricultural development for food security and nutrition: what roles for livestock? They aim to strengthen the contributions of the livestock sector to sustainable agricultural development (SAD) for food security and nutrition (FSN). They are directed at different categories of stakeholders as appropriate: states, intergovernmental organizations (IGOs), the private sector and civil society organizations, and other stakeholders. They should:</p>	<ul style="list-style-type: none"> • The opening chapeaux needs to be strengthened in order to provide a clear contextualization of all recommendations within CFS’s mandate on food security and nutrition (FSN). The chapeaux should be unambiguous in stating that the objective of these policy recommendations is to indicate how the livestock and Animal Source Food (ASF) production sector can contribute to the advancing food security and nutrition in the context of human rights and the progressive realization of the right to adequate food and nutrition (RtAFN); • Such FSN contextualization would also call for the chapeaux to explicit mention the centrality of smallholders, family farmers and pastoralists as the primary contributors to food security and nutrition and the urgent need to counter their condition of insecurity and marginalization; • The chapeaux should contain two important qualifications. The first one is that by livestock sector, the recommendations refer to the “livestock and ASF production sectors”. This is essential to include the entire meat, dairy, leather and other livestock product supply chains, including transport, slaughterhouses, tanneries, processing and transformation plants and therefore address the FSN conditions of ASF workers; • Secondly, the first reference to livestock should refer to “livestock, including working animals and draught power”. Draught power is clearly acknowledged by the report and many draught power/working animals facilitate food production, and ASF food production in particular, without being food production animals in themselves (e.g. working equids that collect feed and water for other livestock, transport animal-sourced foods to market or collection points, transport sick livestock to animal health care providers and so on);

<p>1</p>	<p>Elaborate context-specific pathways to SAD for FSN</p> <p>States and other stakeholders should:</p> <p>a) Use the common approach presented in this report to elaborate, at all appropriate levels, context-specific pathways towards SAD. Such pathways should aim to strengthen synergies and limit trade-offs between the different dimensions of sustainability through improving resource efficiency, strengthening resilience and securing social equity/responsibility. They could draw on initiatives such as the Global Agenda for Sustainable Livestock and the Global Research Alliance on agricultural greenhouse gases. In that respect, in line with SDGs, all stakeholders should support initiatives that involve multi-stakeholders dialogue, consultation and collaboration.</p>	<p>Overall comments on first 3 recommendations:</p> <ul style="list-style-type: none"> • The first three recommendations could be integrated into one main recommendation with sub-items in order to streamline the document; • The overall focus on the revised recommendations should be to ensure the overall coherence of public policies and investments in the livestock sector with the imperatives of FSN, human rights and the RtAFN; • After the HLPE reference in the opening chapeaux, all references to the HLPE report should be cleared to ensure the recommendations are self-standing; • The recommendations should avoid to refer explicitly or implicitly to productionist assumptions and projections which remains debateable. Public policy can and must bend current trajectories down to sustainable levels; <p>Comments on current recommendation 1 (a):</p> <ul style="list-style-type: none"> • The reference to “improving resource efficiency, strengthening resilience and securing social equity/responsibility” should be removed as it introduces concept that would require extensive policy definition. This should be replaced with the three dimensions of sustainable development (economic, social and environmental), as per well-established agreement within the international community. From CSM perspective, the focus on resource efficiency is highly problematic as it further promotes “productivism” rather than a comprehensive/holistic understanding of “resources”. Similarly, social equity/responsibility should be overtly rather than covertly centred on human rights;
<p>2</p>	<p>Strengthen integration of livestock in national SAD strategies</p> <p>States should:</p> <p>a) Ensure that their SAD strategies and plans incorporate the integrated approach to FSN advocated by the CFS and are in line with the SDGs. States should better integrate into their SAD strategies the contributions that livestock systems make to the achievement of FSN. Policies, strategies and programmes need to take into account the interlinkages between different farming systems and their dynamic nature. They should in particular promote crop–livestock integration at a scale and through means that are adapted to the diversity of systems.</p>	<ul style="list-style-type: none"> • All references to the Global Agenda for Sustainable Livestock (GASL) and the Global Research Alliance on Agricultural Greenhouse Gases (GRA) should be removed. Similarly to the SUN discussion in the nutrition context, only global intergovernmental bodies/processes should be explicitly referenced. Furthermore, civil society has yet to receive clarifications on the governance arrangements of GASL, including its relations to FAO and to COAG. GRA is organized by a select group of countries with no scope or clarity for civil society participation; • The recommendation should reaffirm the centrality of public policy. Dialogue with different societal actors should be clearly based on state-centred decision making and should distinguish rights-holders from stakeholders as well as public interest from private interest. The public policy space should be safeguarded against conflicts of interest;
<p>3</p>	<p>Foster coherence between sectoral policies and programmes</p>	

	<p>States and IGOs should:</p> <p>a) Foster greater coherence between sustainable agricultural development, food systems, health, social protection, education and nutrition policies and programmes, as well as between their respective institutions, agencies and ministries.</p>	<p>Comments on current recommendation 2 (a):</p> <ul style="list-style-type: none"> • The recommendation should also address the tensions between the various systems (i.e. “interlinkages and tensions between different farming systems”) and reaffirm the need for policies and investments that strengthen smallholders and their markets; • The last sentence should be edited to recognize that some systems have in-built crop-livestock integration and should therefore be further promoted <p>Comments on current recommendation 3 (a):</p> <ul style="list-style-type: none"> • Coherence should first and foremost be aligned with human rights (as reaffirmed by the CFS Document on SDGs) and then among and across sectoral policies • Missing from the list: environmental policies, competition policies and labour policies <p>New sub-items to be included as sub-items in the reformulated recommendation:</p> <ul style="list-style-type: none"> • One new sub-item should recall the ICN2 outcomes and locate ASF consumption in the context of the promotion of diversified, balanced and healthy diets. It is indeed essential to contextualize ASF consumption within the contraction-convergence approach exposed by the HLPE report; • One new sub-item should promote coherence between policies and programmes related to livestock and the tenure of land and water resources tenure in accordance to VGGT and fully respecting FPIC (Free, Prior and Informed Consent) • One new sub-item should refer to the guiding principles and priorities for action as recommended in the Sendai Framework for Disaster Risk Reduction (SFDRR), in particular, the protection of livelihoods and productive assets, such as livestock, including working animals/draught power, tools and seeds;
4	<p>Develop gender-sensitive livestock policies and interventions</p> <p>States, IGOs and other stakeholders should:</p> <p>a) Collect gender-disaggregated data on women’s roles in livestock production to understand where gender asymmetries persist in the livestock sector;</p>	<ul style="list-style-type: none"> • The recommendations should recognize women’s equal rights rather than purely promote affirmative action to address gender gaps • As mentioned in the chapeaux, the livestock production/sector should be referred to as ‘livestock and ASF’ in order to include agricultural and food processing workers (sub-items a, d and e) • Sub-item (a) should be edited as follows “Collect and make publicly-available gender (...)”

	<p>b) Adopt and ensure implementation of legislation to provide women equal access to and control of land and resources at the community and household levels;</p> <p>c) Ensure that women, in particular smallholders, have access to credit and develop specific financial products for women, in order to facilitate the diversification of their economic activities;</p> <p>d) Improve women’s labour conditions in the livestock sector, including at the processing stage;</p> <p>e) Take measures at the local level to ensure the inclusion of women at every stage of the livestock value chain, taking account of their productive and reproductive roles;</p> <p>f) Take measures to enhance women’s skill and knowledge by providing inclusive training and capacity building activities including when introducing new technologies.</p>	<ul style="list-style-type: none"> • Sub-item (b) should be edited as follows “(...) to provide women with equal rights to economic resources, including equal access to and control of (...)” in accordance to SDG 5; • One additional sub-item should address the right to the full participation of women in decision-making process • Sub-item (c) should be edited as follows “(...) financial products for women that help prevent indebtedness, in order to (...)”; • Sub-item (d) is extremely weak in its current formulation and should be revised to respect, protect and fulfil women’s rights and promote gender equality, including in all ASF sectors;
5	<p>Better integrate SAD issues for FSN in trade policies</p> <p>States and IGOs in relation to stakeholders should:</p> <p>a) Better integrate agriculture, including livestock, feed and related technical issues, into national, regional and multilateral trade rules and policies in order to improve SAD for FSN;</p> <p>b) Establish appropriate national and international food safety and quality standards and ensure their implementation through capacity building and appropriate resources for compliance.</p> <p>Governments, producer organizations, the private sector and civil society should:</p> <p>c) Consider all dimensions of SAD in the development and implementation of standards for animal-sourced foods and livestock feed.</p>	<ul style="list-style-type: none"> • The current recommendation is extremely problematic in its current formulation as it may be understood as subsuming FSN to regional and multilateral trade rules and policies. The suggested text provides a benign characterization of current trade rules and policies with no clear normative hierarchy that places the respect for human rights and FSN above other commercial considerations and agreements. This goes against the reality of extensive trade distortion, import surges and dumping of exports that have undermined several production sectors (e.g. poultry, dairy, milk powder) in many developing and developed countries; • In its present form, sub-item (a) should be deleted. In its place, a new sub-item should recommend to undertake assessments of the impact of trade rules on FSN and the RTF, including relevant sections on livestock, ASF production and feed; • The food safety sub-item (b) should not be located under the trade recommendation as this reinforces the wrong approach of setting food safety standards for the international market and then extending them to the local/national/regional markets. The food safety sub-item should be moved to another recommendation and should be

		<p>inspired by the recently negotiated recommendation on “Connecting SH to Market” that promotes “<i>rigorous protection of food safety through effective risk assessment leading to control systems that are appropriate for different scales, contexts and modes of production and marketing, while providing information and capacity building to meet these requirements</i>”;</p> <ul style="list-style-type: none"> • Sub-item (c) should either be deleted or reformulated in a more concrete manner; • A new sub-item should be included that would read as follows “In consultation with the ILO, establish and strengthen national and international labour standards around the human right of freedom of association, and associated rights like the right of workers to collectively bargain for improvement of their working conditions and their livelihoods”;
6	<p>Limit and manage excessive price volatility States, producer organizations and other stakeholders should:</p> <p>a) Develop tools to limit and manage excessive price volatility, including through the use of grain storage facilities, insurance programmes and other public policy instruments and private initiatives. In particular, these tools should address the risks posed by import surges and volatility in feed markets, and the specific vulnerabilities of smallholders.</p>	<ul style="list-style-type: none"> • We welcome the recommendation to contribute to managing price volatility through the use of grain storage; global and national strategic grain reserves are a key tool in managing volatility and therefore the recommendation should endorse the need for state-supported strategic grain reserves; • However, the recommendation only refers to the real economy, while price volatility is the result of the interaction between the real and the financial economy. Measures that only tackle production and storage, while extremely important, will not address the drivers of price volatility. Sub-item (a) needs to be complemented by a second sub-item that addresses the need to regulate derivatives and other financial instruments that generate price volatility within the financial markets. Language could possibly be adapted from clause 108 of the Addis Ababa Action Agenda on Financing for Development that reads (excerpt) “We are concerned about excessive volatility of commodity prices, including for food and agriculture and its consequences for global food security and improved nutrition outcomes. We will adopt measures to ensure the proper functioning of food commodity markets and their derivatives and call for relevant regulatory bodies to adopt measures to facilitate timely, accurate and transparent access to market information in an effort to ensure that commodity markets appropriately reflect underlying demand and supply changes and to help to limit excess volatility of commodity prices. (...)”; • Within the real economy, essential policy tools should include the establishment of publicly controlled regional and national strategic reserves for grain and hay, and public distribution systems. In this respect, it is important to note that pastoralists are usually a step removed from grain storage systems, and would therefore derive a

		<p>much greater benefit from hay storage facilities. Furthermore, the transformation of agriculture should aim at decreasing reliance on grain as feed;</p>
<p>7</p>	<p>Protect, preserve and facilitate the sharing of livestock genetic resources States, IGOs, food producers, the private sector and research organizations should:</p> <p>a) In order to support SAD, increase cooperation and ensure dissemination, distribution and creation of knowledge and transfer of appropriate technologies to characterize, conserve and manage livestock genetic resources both <i>in situ</i> and in germplasm stores and related facilities;</p> <p>b) Act to minimize genetic erosion of the remaining biodiversity both <i>in situ</i> and in gene banks, as well as to recognize and protect traditional and indigenous knowledge linked to livestock genetic resources;</p> <p>c) Create conditions to facilitate access to livestock genetic resources for food and agriculture and the fair and equitable sharing of the benefits arising from their use;</p> <p>d) Consider the establishment of dedicated international mechanisms to realize these objectives;</p> <p>e) Promote the recognition and protection of smallholders and indigenous peoples' livestock genetic resources as well as the associated knowledge of those resources;</p> <p>f) Recognize and protect the rights of smallholders and indigenous peoples to determine access to their livestock genetic resources including their right to determine who should have access to them and to a fair and equitable share of the benefits that arise from their use.</p>	<ul style="list-style-type: none"> • The title of the recommendation requires clear contextualization in FSN and RTF • The recommendations refer to different actors and it is particularly important to single out the role of the State and public policies as different from other actions, as this is an area where there is a deficit of public regulation and an excess of ongoing privatization. The distinction, which is relevant in all areas, is particularly important in this context; • In sub-item (a), delete “and transfer of appropriate technology to characterize”; • In sub-item (b), edit as follows “(...) recognize and protect all customary rights related to traditional and indigenous knowledge (...)” • Sub-item (c) is significantly problematic in its vagueness and absence of an appropriate juridical framework of reference. It should be deleted; • No new and/or parallel structures are required and sub-item (d) should be deleted; • Sub-item (e) should be edited as follows “Promote and support the recognition (...)”. Also, the item should be further developed to include the provision of public breeding and public support for indigenous, pastoral and smallholder breeding initiatives (this could also become a separate sub-item); • Sub-item (f) should be edited as follows “(...) that arise from their non-exclusive use”;

<p>8</p>	<p>Improve surveillance and control of livestock diseases States and IGOs should:</p> <p>a) Implement <i>One Health</i> approaches to improve the surveillance and response for diseases emerging from livestock systems;</p> <p>b) Cooperate to provide transparent reporting for early warnings on transboundary diseases and emerging zoonosis;</p> <p>c) Provide adequate means to ensure compliance to international and national laws and rules;</p> <p>d) Provide financial and technical support for improved animal health and welfare in agricultural development, including for capacity building programmes.</p>	<ul style="list-style-type: none"> • The title of the recommendation should include reference to animal health and welfare in the context of the One Health approach. It could be reformulated as “Improve disease surveillance and control of livestock diseases health and welfare, in the context of the One Health approach” • In sub-item (a) the mention of One Health is appreciated but not sufficient. A separate sub-item should explicitly refer to antimicrobial resistance, which is one of the major public health challenges in both developed and developing countries. The item should refer to the urgency to implement the Global Action Plan on AMR and call for the strengthening of the WHO-FAO-OIE tripartite collaboration on AMR. In particular, it should call for a more active role of FAO in building capacity of Member States to reduce the use of antibiotics in livestock production with a view to eliminating their routine and prophylactic use; • Also in sub-item (a), add the following language at the end of the sentence “(...) emerging from livestock and ASF systems”; • In sub-item (d), it is essential to explicitly refer to the five freedoms for animal welfare (as referred to by the HLPE report). The can be reformulated as follows “Provide financial and technical support for improved good animal health and welfare delivering the five freedoms in agriculture al development, including for capacity building programmes and access to veterinary services adapted to the circumstances of the various production systems, and particularly to the pastoralist system”; • Add the following bullet point to address occupational hazard: <ul style="list-style-type: none"> e) Provide support for research and development of best management practices (BMPs) for reducing and eliminating antibiotic zoonotic pathogens as occupational hazards for workers in animal raising, slaughtering and processing, and then adequately fund training for workers to implement these BMPs as part of an ongoing national occupational safety and health and public health programme;
<p>9</p>	<p>Promote research and development States and IGOs should:</p> <p>a) Integrate a participatory approach when designing an agenda and allocating resources for R&D, and focus on technologies, practices, metrics and institutions needed to improve resource efficiency, strengthen</p>	<ul style="list-style-type: none"> • The title of the recommendation requires clear contextualization in FSN and RTF, otherwise it may be understood as simply referring the development of the livestock sector. Also the term “participatory” should be included in the title; • In sub-item (a), it must be clear that, in view of the FSN focus, the participatory approach should be centred on the smallholders and pastoralists, and the priorities they identify, and aimed at strengthening their capacity to further contribute to food

	<p>resilience and secure social equity/responsibility in diverse livestock farming systems;</p> <p>b) Enable participatory research in order to promote the integration of diverse knowledge systems about livestock keeping, including animal breeding;</p> <p>c) Promote the collaboration of researchers in livestock keepers’ and other stakeholders’ innovation processes and platforms to ensure dissemination of research findings and sharing of good practices.</p> <p>States, IGOs and the private sector should:</p> <p>d) Leverage the potential of information and communication technologies (ICT) in order to gather, share and use information in different livestock systems, ensuring broad access, in particular by women, vulnerable and marginalized communities.</p>	<p>security and nutrition. The last part of the sentence (resource efficiency, strengthen resilience and secure social equity/responsibility) should be dropped as per the comments in the first three recommendations;</p> <ul style="list-style-type: none"> • Sub-item (b) should be edited as follows “(...) including animal breeding, health and welfare”; • An additional item should be included to support the protection and strengthening of traditional knowledge systems and the valuing of experiential knowledge; • An additional item should be included to promote the assessment of the impact on FSN of past investment on R&D related to livestock; • With respect to sub-item (d), civil society and particularly smallholders and their organizations should be included among the targeted actors of the recommendation;
10	<p>Review and improve indicators and methodology and identify data gaps</p> <p>FAO, in coordination with relevant international and national agencies and other relevant stakeholders, should:</p> <p>a) Review the data sets, indicators and methodologies that are needed to monitor and evaluate SAD for FSN, using such tools as the World Agricultural Census and the preparation of indicators for the SDGs, and identify data gaps;</p> <p>b) Consider ways to improve the monitoring of changes in grasslands and their biodiversity, and to report on their global state;</p> <p>c) Make available online an inventory of evidence-based policy measures as well as producer organizations, the private sector and other stakeholders actions that contribute to SAD for FSN.</p>	<ul style="list-style-type: none"> • Separate statistics are needed for the different systems, with special emphasis on the actual contribution of each livestock system to FSN. This can be integrated in sub-item (a) or be the subject of a new sub-item; • It is also important to make reference and ensure synergy with relevant data sections of other CFS policy recommendations and products, with special reference to the relevant clauses and recommendations of the recently negotiated Connecting SHs to Market negotiation; • A new sub-item should be included to promote, in a participatory manner, the development of suitable indicators for the impact analysis of the different modes of production on healthy and sustainable diets; • A new sub-item should include data on the level of market concentration in each livestock system and an analysis of how it hinders advancing food security and nutrition in the context of human rights and the progressive realization of the right to adequate food and nutrition (RtAFN). Given the growing global consolidation and concentration of firms which control the entire livestock production value chain (from feed, medicines, production and processing of animals), this is a major global gap in both data analysis and efforts to understand its negative impacts on RtAFN;

	<p>RECOMMENDATIONS RELATED TO SPECIFIC LIVESTOCK SYSTEMS</p> <p>States, IGOs and other stakeholders should consider the roles of different livestock systems in all agricultural, food security and nutrition policies and promote SAD-oriented efficiency and sustainability pathways that are adapted to the specificity of each of the systems. In particular, they should:</p>	<ul style="list-style-type: none"> • This second chapeaux should provide an adequate contextualization for the recommendations related to specific livestock systems. It should clarify that these recommendations are not aimed at strengthening livestock production within each of the systems but rather at promoting the contribution of each of the systems to FSN and RTF; • The chapeaux should also explicitly expose the fact that these four systems do not coexist peacefully and significant tensions emerge from their interplay. Furthermore, the currently massive use of agricultural land (80 percent, as stated by the HLPE report) by the livestock sector means that any land intensity increase by one of the systems almost automatically involves a negative impact on the land intensity of the others; • This means that the chapeaux should recognize that the smallholder mixed system and the pastoral system, as the primary contributors to sustainable livelihoods and food security, biodiversity protection and ecosystem renewal, should be supported by adequate public policies to strengthen and protect them, as they are often negatively affected by the development of the industrial system as well as by lack of coordination among governmental policies; • The chapeaux should also mention that protecting the health and welfare of livestock is key to maintaining productive livestock across all four livestock systems and that the loss of these animals (through disease, injury or exhaustion) can have devastating consequences for the food security and nutrition of the families who depend upon them; • The current references to efficiency and sustainability to be deleted (SAD-oriented sustainability pathway is a circular reference); • Finally, there is no real mention in the recommendations about the need for climate adaptation. This is relevant to all the systems mentioned – more diverse systems are more climate resilient and with coming climate-related disruptions in animal production and access to feed, it is essential to address. Along these lines, the chapeau should emphasize the importance of soil health and the link between more climate resilience and livestock systems that result in stronger soil health;
11	<p>Recognize the importance of smallholder mixed farming systems for FSN and support them by:</p>	<ul style="list-style-type: none"> • The first two paragraphs need to have greater focus on the strengthening of local, national and regional markets and should recall relevant recommendations of the Connecting SHs to Market process;

	<p>a) Enhancing economic viability and access to markets; prioritizing fairer markets and measures to overcome obstacles faced especially by women, marginalized and vulnerable groups engaged in managing small-scale livestock operations;</p> <p>b) Creating an enabling environment for collective organizations and actions of smallholders; investing in market information and infrastructure (including informal markets);</p> <p>c) Strengthening security, tenure and title of customary lands, property rights and governance of common natural resources building on the CFS Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests, and other relevant instruments in the international legal framework;</p> <p>d) Leveraging the potential of livestock as a means for sustainable livelihoods in smallholder mixed farming systems.</p>	<ul style="list-style-type: none"> • Sub-item (d) should be edited as follows “(...) farming systems, enabling farmers to make better use of their livestock resources, including working animals, through improved husbandry, and suitable and accessible animal health and extension services, and become more climate resilient”; • A new sub-item should be included to recommend public policies and investments to protect the mixed farming systems from the negative interlinkages with the other industrial intensive systems; • A new sub-item should be included as follows “States should have in place credible competition and merger regulation authorities, which restrain the creation and abuse of dominant buyer power, with a view to protecting small-scale farmers from such abuse. States must curtail such buyer power abuses throughout ASF supply chains with antitrust regimes that are effective enough to fully protect farmers’ and workers’ right to decent livelihoods, including their right to adequate food”. Excessive market concentration results in buyer (monopsony) abuse that tends to depress prices for suppliers all along in global ASF supply chains, thus denying farmers and workers their rights to decent livelihoods, including their Right to Food. It also tends to block market access and inhibit essential investments that should otherwise provide farmers and workers with to a path to upward mobility, thereby exacerbating rural poverty and inequality;
<p>12</p>	<p>Recognize and support the unique role of pastoral systems by:</p> <p>a) Strengthening the role of local pastoralist organizations in adaptive land management and governance in order to increase the resilience of pastoral systems and households, in particular with respect to climate change, conflicts and protracted crises, as well as price volatility;</p> <p>b) Considering the use of innovative financing mechanisms to invest in the provision of basic services adapted to the needs and ways of life of pastoralists, including culturally appropriate education, health, communications, drinking water and sanitation services, and renewable energy systems;</p>	<ul style="list-style-type: none"> • Insert new opening sub-item to recognise the fundamental role of the pastoralist systems, including their traditional knowledge and ways of life, in contributing to FSN and supporting the ecology/environment in the continued reproduction cycle of nature and the improvement of soil health; • In sub-item (a), the reference to ‘local’ when referring to pastoralist organizations should be removed, as pastoralists should be free to organize themselves as they better deem appropriate. Furthermore, the expression “increasing the resilience” should be replaced with ‘in order to strengthen pastoral systems’; • In sub-item (b), it is very unclear what innovative financing mechanisms mean. The recommendation needs to call for public investments and policies that support the quality provision of social and other services adapted to the needs and ways of life of the pastoralists. It should also include “animal health/veterinary services” in the list of services;

	<p>c) Exploring ways to improve the connection of pastoralists to local, national and international markets;</p> <p>d) Strengthening security, tenure and title of customary lands, property rights and governance of grazing resources building on CFS Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests, and other relevant instruments in the international legal framework;</p> <p>e) Enabling the mobility of pastoralists, including transboundary passage, through appropriate infrastructures, institutions, agreements and rules.</p>	<ul style="list-style-type: none"> • Sub-item (c) is very general and should be strengthened by referring to the Connecting SHs to Market recommendations, with particular emphasis on the critical importance of strengthening and protecting local and regional markets, including cross-boundary ones. It should be edited as follows “Exploring ways to improve the connection guarantee of pastoralists the right to access open, public markets at the to local, national and international levels markets, and to establish strong and effective protections against exploitive, captive supply contracts; • Sub-item (e) should be edited as follows “(...) mobility of pastoralists and respecting pastoral corridors, including (...)”;
13	<p>Promote the sustainability of commercial grazing systems by:</p> <p>a) Supporting sustainable management of livestock, pastures and feed in order to minimize harmful environmental externalities, including by promoting models of production that preserve biodiversity and ecosystem services and reduce GHG emissions;</p> <p>b) Exploring context specific technical possibilities and policy initiatives for integration of plants and animals at diverse scales, such as, for instance, agro-sylvopastoral systems;</p> <p>c) Promoting practices that enhance resource efficiency and resilience of commercial grazing systems.</p>	<ul style="list-style-type: none"> • The categorization of this system as “commercial grazing” evokes the false characterization of the pastoral system as being non-commercial and purely focused on subsistence. This production system should therefore be renamed (i.e. large-scale grazing systems); • The title of the recommendation only focus on “sustainability”. While this is an important dimension, all recommendations should be clearly directed to FSN and RTF. It is therefore unclear at this stage what is the FSN contribution that this recommendation promotes. All further comments are therefore dependent on a reformulation of this recommendation to address FSN and RTF; • Sub-item (a) should be edited as follows “(...) in order to minimise and reduce harmful environmental impacts, including externalities, (...) preserve biodiversity, ecosystem services, prevent deforestation and water pollution, safeguard animal health and welfare, enhance soil health and climate resilience, and reduce GHG emissions and enhance carbon sinks, taking into account the analysis of the carbon footprint of feed grain production” (as it is not just the emissions that matter); • Sub-item (b) should be edited to explicitly include a call to stop deforestation and land exchanges from natural ecosystems to create grazing areas;
14	<p>Address the specific challenges of intensive livestock systems by:</p> <p>a) Ensuring that the working and living conditions of workers, especially women and other vulnerable</p>	<ul style="list-style-type: none"> • The categorization of this system couples together medium-size (family) farms and large-scale industrial corporations, which is debatable. The large-scale industrial system should be clearly singled out in this category. More importantly, the title of the recommendations should more clearly identify that the challenges it aims to address

<p>workers, including temporary and migrant workers, at all stages of production, transformation and distribution, meet international standards and are protected by domestic laws;</p> <p>b) Undertaking lifecycle assessment along the complete food chain to identify options for increasing production while minimizing negative environmental impacts and excessive use of energy, water, nitrogen and other natural resources;</p> <p>c) Improving technical efficiency by monitoring the individual performance of herds and animals;</p> <p>d) Supporting and improving animal health and welfare by promoting good practices and by establishing and enforcing robust standards for different species in intensive systems, building upon the World Organisation for Animal Health (OIE) guidelines and private sector initiatives;</p> <p>e) Exploring and implementing approaches for the reduction of antimicrobial use in livestock production;</p> <p>f) Developing innovative approaches, with farmers' organizations, at diverse scales, in order to facilitate the use of manure as organic fertilizer – and to promote the use of crop co-products or residues and waste as feed including through technical innovations.</p>	<p>are those related to the problematic relation that this production sector has with FSN and RTF. Indeed, this sector needs to focus on its de-intensification in the use of resources for livestock production and feed. Any reference to increasing production should therefore be removed;</p> <ul style="list-style-type: none"> • Another sub-item should follow sub-item (a) stating: “Ensuring that states create fair market competition by eliminating market concentration in the system; its monitor its impacts on other livestock systems. In this regard, states should regulate firms to ensure fair contracts and respect FAO guidelines on fair contracts that could be cited in this section: http://www.fao.org/ag/ags/contract-farming/index-cf/en/) • Sub-item (b) should be edited as follows “Undertaking lifecycle assessment along the complete food chain to identify options for increasing production while minimizing and reducing negative environmental impacts and excessive use of energy, water, nitrogen and other natural resources” (research shows that lifecycle analysis is a poor tool for measuring environmental performance in agriculture). In addition, as this system is responsible for most livestock related GHG emissions – both through deforestation and giant manure lagoons, an additional sentence should be added that states: “and also undertaking steps to dramatically reduce associated nitrous oxide and methane emissions by regulating the industry as we do other major emitters”; • Sub-items (c) and (f) should be deleted as too specific and not related to FSN. . Furthermore, intensive use of manure applications as fertilizer in industrial systems has led to untenable pollution of soils and water bodies with chemicals, antibiotics, nitrogen, ammonia and harmful gases. The text may also be understood as incentivising the shipment of manure. Moreover, anaerobic biodigesters only lead to more production of manure rather than deal with the problem of methane and systemic air, water and soil pollution; • Sub-item (d) should be edited as follows “(...) guidelines and private sector and other initiatives that exceed those standards”; • Sub-item (e) should be strengthened by calling for the phasing out of routine and prophylactic use of antibiotics, by referring to the Global Action Plan on AMR and by calling for stronger leadership of the FAO in that regard. It should also include the following “and the reduction of other additives such as hormones and other harmful chemicals including in the processing sector”;
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	<ul style="list-style-type: none"> • A new sub-item should be added to “promote policies and practices that the industrial system does not displace or negatively affect other production systems and does not harm livelihoods and the progressive realization of the RTF”;
<p>A new and additional recommendations is proposed to address workers’ rights and conditions within the livestock and ASF production sector (to be included prior to the specific recommendations to the different livestock systems:</p> <p>State should:</p> <ol style="list-style-type: none"> Ensure compliance with ILO Conventions covering the agriculture/livestock sector, especially core conventions relating to freedom of association and collective bargaining, increase labour inspection in livestock raising, meat processing and packing, and ensure that decent work is at the heart of livestock and ASF processing policies; Develop specific programmes to improve occupational health and safety in the livestock and ASF processing sectors, and take specific measures to protect vulnerable workers, especially migrant workers; Research and designate zoonotic pathogens as occupational hazards for workers in animal raising, handling and transport, slaughtering and processing, and implement monitoring, treatment and prevention measures as part of national occupational safety and health and public health programmes. Develop best management practices (BMPs) for preventing workers from being exposed to zoonotic pathogens for every step of the ASF supply chain—from pasture to transport, slaughter, processing and retail sales of poultry, meat and dairy. Then develop and fund worker-training programmes to implement the BMPs developed. Take measure to address retail and meat processing concentration and related unfair trading practices, including, but not limited to, curtailing buyer (monopsony) power abuse in ASF supply chains; <p>Private sector should:</p> <ol style="list-style-type: none"> Ensure that in enterprises and ASF supply chains all human rights are protected and promoted and that remedy is available as laid down in the UN Guiding Principles on Business and Human Rights; Recognise the right of their workers to form join and be represented for the purposes of collective bargaining by trade unions and negotiate with those unions in good faith, and adopt employment policies which maximise secure and permanent employment and ensure there is no discrimination, including against migrant workers; Adopt safe and healthy workplaces and have in place structures for meaningful workers and trade union input. These structures should include jointly developing and holding occupational health and safety training programmes in workplaces along the ASF supply chains. Participate with independent unions and governments to jointly develop best management practices (BMPs) for preventing workers from being exposed to zoonotic pathogens for every step of the ASF supply chain— from pasture to transport, slaughter, processing and retail sales of poultry, meat and dairy. Then develop and fund worker-training programmes to implement and improve the BMPs developed on an ongoing basis. 	
<p>A new closing section should be included to address follow-up mechanisms, including a plenary discussion (in 3-5 years) to review the use and application of these recommendations.</p>	

