

Zero Draft of the Policy Recommendation on “Agroecological and other innovative approaches” CSM’s Comments

This document conveys the collective response of the Civil Society and Indigenous Peoples’ Mechanism (CSM) to the Zero Draft of the Policy Recommendation on “Agroecological and other innovative approaches”. The document is based on the ongoing work of the CSM Agroecology Working Group, which currently comprises 97 movements, organizations and networks from all CSM constituencies.

As CSM, we have already shared our appreciation of the HLPE Report on “Agroecological and other innovative approaches” as a good first step in this discussion. We believe the Report has presented agroecology quite accurately, by recognizing the conceptualization of agroecology made by social movements in the Nyéléni process, by reaffirming that agroecology has the power and potential to drive the much-needed transformation of our food systems and by providing scientific evidence in support of such transformational pathway.

Through this response we would like to express our **deep concern about the shift in the subject focus of proposed recommendations**. While they are expected to be policy recommendations on “agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition”, they seem instead to be recommendations on innovations first and foremost, with the inclusion of agroecological approaches only in an undifferentiated amalgamation of approaches that disregards the extensive evidence-based analysis presented in the report.

This change of focus is neither acceptable nor justified by the process so far. The proposed recommendations not only fail to provide any clear guidance on how to establish a coherent policy framework to support agroecological approaches for those Member States who would pursue this transformative pathway, but they also fail to distinguish between the competing and even conflicting impacts of the widely varying types of approaches assessed in the HLPE report and their implications for the sustainability of our food systems and nutrition. In addition, some recommendations are formulated upon approaches that were not even present in the HLPE report. In this sense, we believe that the Zero Draft is a missed opportunity to transform the conclusions of the HLPE report into valid policy recommendations.

In this respect, we reiterate the need to build on and anchor this policy convergence process in the work already done by FAO on agroecology, in particular the 10 Elements of Agroecology previously agreed and adopted by the FAO Council. **It is also essential to locate the recommendations within the framework of CFS’s mandate on the progressive realization of the right to adequate food, the UN Decade of Family Farming, the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), the UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) and the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP) adopted by the UN General Assembly.**

General comments on the overarching conceptual framework:

1. **The Zero Draft lacks clear policy emphasis on transforming food systems and the role that innovation plays in such process**: The HLPE Report bases its analysis on the premise that a **transformation of the current food system** is urgently needed due to the multiple dysfunctionalities of conventional agriculture that have led to increased hunger and depletion of natural common goods. Based on this analysis, the Report recommends the adoption of the “ecological footprint” as a “fourth operational principle for SFSs” and “Agency” as a fifth pillar of food security and nutrition. It is crucial that these recommendations are taken on board in the next Draft to clearly shed light on **the direction and pathways leading to transformation to a more sustainable and equitable¹ food system**.

¹ Report of the International Conference on Agrarian Reform and Rural Development (ICARRD) (7-10 March 2006). C/2006/REP. Porto Alegre, Brazil

However, the current policy recommendations in the Zero Draft completely miss out the conceptual framework of transforming food systems, which is also a priority within the Agenda 2030 process, offering instead an assortment of vague, disconnected and sometimes doubtfully relevant recommendations for disparate actions - merely for “consideration”- while lacking a coherent unifying framework for decisive policy action. On the contrary, **the revised Draft should more clearly endorse a holistic approach to food systems**, one that clearly sets out the multiplicity of public objectives that food systems serve and how they can help advance multiple SDGs within the 2030 Agenda and thus specifically ensures that all its recommendations reinforce rather than undermine each other.

2. **The Zero Draft fails to guide policy choices between different pathways: The HLPE Report has clearly differentiated agroecology from other innovative approaches** with respect to its benefits and contributions to SFSs for FSN (see Table 4).² The Zero Draft policy recommendations should therefore present policy measures that advance the “agroecological and related approaches” identified therein, which together – and led by agroecology specifically – have been shown to bring about all the positive characteristics listed (e.g. from regenerative production, biodiversity, climate adaptation & mitigation, through to social and human values of equity, democratization, rights, etc.). Instead, the Zero Draft incorrectly implies that all the approaches mentioned in the report have similar value, without differentiating their contribution – positive or negative - to sustainable food systems. By doing so, **the Zero Draft amalgamates agroecology with other innovative approaches**³ as if they were interchangeable.

In so doing, it fails to accurately present the evidence-based recognition by the HLPE Report that unambiguously portrays agroecology **as the most robust pathway to achieving food systems that are equitable and sustainable in all its three dimensions** (social, economic, ecological/environmental). Indeed, the HLPE Report clearly categorized the approaches into transformative agroecological approaches and other more incrementally-oriented approaches, a categorization that proved to be very useful in assessing their relative contribution to sustainable food systems. In some instances, “incrementalist” approaches may undermine desired progress towards system transformation and sustainability. For example, the Zero Draft’s emphasis on “optimizing” the continued use of agrochemicals is unwarranted and runs contrary to the findings of the HLPE Report, as such an approach was not identified as a way forward towards sustainable and equitable food systems.⁴ **The Zero Draft therefore fails to forcefully put forward a strong assessment framework that can help evaluate different innovations.**

3. **The Zero Draft does not recognize the value of Agroecology:** The high-level conclusion of the HLPE Report, based on extensive empirical evidence, is that agroecology offers a system wide and integral solution to the multiple crises that humanity is facing. The current policy recommendations, however, adopt an “innovation framing” to look at agricultural production methods and that treats all the approaches simply as innovations, without establishing differences within their proposal, neither among their socio-environmental impacts and without providing any clear guidance on prioritizing as to which approach would most effectively transform food systems. Furthermore, the Zero Draft treats innovation as a technology rather than a process - a narrow and incorrect understanding of the concept of

² Table 4: Comparison of different innovative approaches towards SFSs for FSN. HLPE. 2019. Agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome. p.63. <http://www.fao.org/3/ca5602en/ca5602en.pdf>

³ Only two recommendations focus on agroecology while the rest associate agroecological approaches with other innovations

⁴ The HLPE report mentions agrochemicals in three places, which speak to the need to *reduce* (not “optimize”) use of agrochemicals by replacing them with agroecology (p. 14), noting that governments have too often relied heavily on them, undermining biological pest management strategies (p. 37) and over-investing in these, to the neglect of more diversified approaches (p. 48).

⁵ Paragraphs 1, 22 and 23. Report of the Special Rapporteur on the right to food (Effects of pesticides on the right to food). Human Rights Council, Thirty-fourth session (27 February – 24 March 2017). Agenda item 3, *Promotion and protection of all human rights, civil, political, economic, social and cultural rights, including the right to development*. <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G17/017/85/PDF/G1701785.pdf?OpenElement>

“innovation” that was firmly rejected by the HLPE report. **The result is a complete disregard of the HLPE recommendations and resultant lack of focus on agroecology** as well as absence of guiding principles for governments on how to implement and strengthen agroecology for sustainable food systems in all dimensions.

The draft recommendations therefore do not reflect the **HLPE Report’s conclusions that agroecology is a truly transformational pathway** to address all the structural changes needed in our food system in a systemic and integrated way requiring significant policy change to level the playing field in terms of institutional support. Currently, institutional investments and support broadly privilege agricultural approaches contributing to unsustainable and inequitable outcomes, an imbalance that needs to be addressed with corrective policy measures according to the HLPE Report. Furthermore, the draft recommendations fail to build on the excellent work done by Member States to endorse the 10 Elements of Agroecology within the FAO process, missing an opportunity to strengthen the synergy and coherence between the FAO process and the CFS proceedings. We therefore call for the revised policy recommendations to clearly guide governments and other actors on how to establish enabling policy conditions for an agroecological transformation of our food systems. Moreover, the revised draft should highlight and enunciate FAO’s 10 Elements on Agroecology as approved by the last FAO Council.⁶

4. **Addressing digitalization is important but the issue is being provided disproportionate importance within the current scope of the draft recommendations:** The HLPE report talks about digital technologies and the extent to which these might be compatible with transitions towards SFS, highlighting how some of these technologies can strengthen the direct links between producers and consumers for example as well as exploring a number of challenges that these technologies might involve. The Zero Draft presents digitalization as an “innovative approach” reinterpreting the findings and structure of the HLPE report, which does not talk of it as an approach but rather as a technology that can be used in “innovative approaches”. When stating this, it is essential to stress that agroecology is not anti-technology and anti-innovation, **as modern technologies, including digital ones, are an integral part of the rich mix of heritage, practice and science that agroecological producers experiment and apply**. But this requires a much more profound analysis of the political economies associated to who owns and controls digital technologies in order to ensure that their application originates from real needs of local small-scale food producers and is therefore context-specific and/or locally-adapted⁷. Addressing the potential negative impacts that digitalization may have on small scale food producers is paramount but requires a full dedicated discussion this process may not be able to provide.

CSM’s recommendations for the next draft and the way forward

This section offers a range of more specific comments and recommendations to be taken into consideration while preparing the First Draft. In addition, each of the points offer direct suggestions on possible changes for the current text.

- 1) **The overall conceptual framework should be redressed by clearly differentiating agroecology, in one section and other innovative approaches in another section, such as the HLPE report did. The recommendations should clearly strengthen and prioritize agroecology and re-endorse the differentiations between Agroecology and other innovative approaches proposed by the HLPE Report.**

⁶ <http://www.fao.org/3/ca7173en/ca7173en.pdf>

⁷ “Digital technologies cannot be analysed in isolation, as the context of their applications will determine their scope. [...] Food sovereignty must be the basis for creating national food policies. The technologies in Agriculture 4.0 are adopted and promoted by the current agribusiness monopolies, and it is difficult to think that these same corporations are promoting de-centralization, democratization and cooperation instead of competition. If these technologies are installed, there must be public control of their procedures and international instruments must be created to prevent digitalization and corporate power from controlling food systems.” *Digitalización y poder corporativo en la cadena industrial alimentaria*. Tecnologías: manipulando la vida, el clima y el planeta (2019) América Latina en movimiento, 543, p. 13.

https://www.etcgroup.org/sites/www.etcgroup.org/files/files/revista_alaietc_alem543.pdf

- Section II, Paragraph 19: It should refer explicitly to agroecology. Proposed alternate text: “Promote agroecology to conserve and strengthen diverse and resilient agroecosystems that ... [etc.]”
- Section IV: Although it contains some interesting elements, it remains weak overall, especially by failing to include consistent recommendations targeting specifically agroecological approaches. It should clearly include recommendations calling States to prioritize agroecology in agricultural research, extension services and education, notably by⁸:
 - Focusing public agricultural research on agroecological innovations such as improving the productivity of local varieties through growing practices, land use and soil fertility management and building on small-scale producers’ agroecological knowledge, know-how and innovations;
 - Closely associating representatives from small-scale food producers’ organizations and networks and consumers in defining public research and extension services priorities as well as in controlling, designing, conducting and monitoring research activities; and,
 - Supporting the development of farmer-led and community-driven participatory research and extension services for the co-construction and dissemination of agroecological knowledge, e.g. through funding support.

2) Apart from addressing the weak conceptual framework, which enables the amalgamation of all kinds of “innovative approaches”, the recommendations also need to be reworked to obtain the proposed objectives of this document: to give guidance to governments on how to implement and strengthen truly transformative pathways towards sustainable food systems in all its dimensions.

- Section I: It suffers from the limitation of the conceptual framework adopted. All approaches are included without reference to significant differences in their capacity to contribute to sustainable food systems. Moreover, there is no mention of the ecological footprint and agency. The lack of focus makes recommendations under Section I almost meaningless as policy guidance.

3) The policy recommendations should be based on and valorize the actual content and findings of the HLPE report on “Agroecological and other innovative approaches”, rather than previous HLPE reports or other frameworks - which seems to be the case at the moment.

- The preamble should be reframed around a holistic food system approach. It should state that any decision, innovation, policy, research, fora or initiative promoted within this decision box need to be weighted according to its impact on the four HLPE operational principles of food systems (resource efficiency, resilience, social equity/responsibility, ecological footprint). This would prevent the promotion of items that are only beneficial to one of those principles (e.g. the resource efficiency part for instance) and detrimental to the others.
- The preamble should acknowledge the HLPE report’s recognition of:
 - human rights as the basis for ensuring sustainable food systems
 - Social movements (representing hundreds of millions of smallholder food producers) seeing a close connection between Agroecology, food sovereignty and the right to food
- The preamble should name and explain each of the innovations as the HLPE report did.
- The preamble refers to the existence of three types of food systems (traditional, mixed, modern) as they were officially adopted by the CFS. This is not correct: while this categorization was proposed in the 2017 HLPE report on “Nutrition and Food Systems”, the Committee only noted the typology of these 3 food systems⁹. The assumption that “All food systems have the potential to contribute further to sustainability and food security and nutrition” is misleading.

⁸ See also point 4 on the role of public services

⁹ CFS 44 Final Report. <http://www.fao.org/3/a-mv030e.pdf>

- The preamble, and more specifically Paragraph 8 should recognize explicitly the urgent need for a transformation of food systems
- Section I, Paragraph 11: A reference to the right to food should be added. Proposed text : *“Ensure that policies promote innovations that are appropriate, affordable and acceptable and contribute to the three dimensions of sustainability – economic, social and environmental – in such a way that they strengthen the realization of the human right to food and nutrition as well as the four pillars of food security and nutrition (availability, access, stability and utilization).”*
- Section I, Paragraph 17: The co-advantages of agroecology are not only employment. The following, referred by the HLPE report, should also be included:
 - Improved water security
 - Secure and enhanced soil health
 - Climate resilience
 - Biodiversity enhancement
 - Securing sustainable, healthy and diverse diets for all
 - Revitalized rural economies
 - Healthier environment
- Section I, Paragraph 18: We appreciate this paragraph and its placement under this section. However, it has lost the reference made by the HLPE report on land grabbing (*“[...] ensure legal protection of customary land and natural resources access and tenure rights for [...]”*, recommendation 4.d of the HLPE report). This should be re-included, along with the mention of other formal instruments, beside the VGGTs, consistent with international legal frameworks (such as the UN Declaration on the Rights of Indigenous Peoples, the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas, the Convention on the Elimination of All Forms of Discrimination Against Women), and through national regulation of large-scale land acquisitions.
- Section II: The Biodiversity and Ecosystem approach adopted at the CBD’s COP 5 in 2000 is not part of the framework proposed by the HLPE report. This contributes to this impression of “patchwork of recommendations” and questions the coherence of the Zero Draft.
- Section II, Paragraphs 19,22,23: This part is too general regarding the agroecosystem. They could greatly benefit from the explanations/analysis produced within the HLPE report. More in particular, there should be an inclusion of recommendations related to:
 - The redirection of the subsidies towards agroecology (recommendation 2.a.i. of the HLPE report)
 - The territorializing of the promoted approaches. It is included under Section I, but it makes more sense for it to be placed here, just as the HLPE report did under recommendation 2.
 - Access, use and exchange facilitation for all farmers of various, traditional and locally adapted genetic resources. This should also include Indigenous peoples’ right to give their free, prior and informed consent for a final decision on access to genetic resources
- Section II, Paragraph 27: It should support incentives for recycling systems and a circular economy. Include *“foster recycling of different types of waste: animal waste, crop residue etc.”* (recommendation 2.c.iv of the HLPE report)
- Section IV: While it is partially addressed in Paragraph 36, we miss one recommendation regarding the inclusiveness of the promoted technology transfer mechanisms (recommendation 3.e. of the HLPE report) and their level of appropriation, replication and adaptation by the indigenous, peasant and local communities.
- Section IV, Paragraph 40: The *“strengthening of public research to assess the impact”* should not be limited to *“the use of agrochemicals”*. The public-led impact assessments should also

include biotechnologies and any proposed innovation. Furthermore, the social and economic aspects should also be part of the assessments, including the capacity of any proposed innovation to benefit or not the most marginalized populations, especially women.

4) The role of public services should be strengthened.

- The preamble: We welcome the public sector's mention in the recommendations, but their role should also be described in the preamble.
- Section I, Paragraph 12: The role of the public sector is only presented as a monitoring/regulating one. The implementing role of the public sector should also be mentioned.
- Section I: An additional point should be added regarding the valorization of local common knowledge. Proposition: *"Ensure that food and agriculture related public policies reaffirm and strengthen the protection and promotion of Indigenous Peoples and small-scale farmers' traditional and local knowledge"*.
- Section IV, Paragraph 41: This paragraph is important and should be kept. The protocols mentioned should address the current imbalance between the public and the private led research and promote policies that redress this imbalance by promoting investment in participatory public-led research.
- Section IV, Paragraphs 44, 45, 46: While the HLPE report highlights the lack of promoting funding for research for agroecological practices, we do not see here any recommendation reflected in this regard. Language should be added to clarify that the focus should be on public research. In this sense, mechanisms need to be put in place to ensure that research priorities are oriented towards the public interest rather than defined by corporate/private interests while also ensuring accountability and address conflicts of interest.

5) Enhancing local food systems is key from a sustainability perspective. In this sense, the Zero Draft should prioritize support to domestic food systems. It should include specific language for improving access to markets for agroecology products and more strongly encourage support the development of short circuits. In this sense, market concentration should be addressed, as this has proved to be detrimental to small scale food producers and more broadly to human and environmental rights.

- The preamble should expand references to cooperatives and associations of family, small-scale and peasant agriculture, highlighting the importance of small and medium family enterprises in the organization, processing and marketing of local, organic and agroecological production, linked to food and nutritional security policies and access to public and private markets.
- Section II, Paragraph 21: In relation with Farmers' Rights, governments should support agroecological farmers for their *in-situ* conservation of seed diversity by:
 - o providing them with financial support
 - o establishing community seed banks or storage systems under the direct control of the communities themselves and
 - o designing and implementing better laws to enable them to save, reuse, exchange and sell their seeds as key elements to guarantee their right to food.This part should also be strengthened by including the necessary protection of genetic resources against appropriation and genetic pollution (e.g. from biotechnologies)
- Section II, Paragraphs 27, 28, 29: Should focus on initiatives/enterprises that primarily structure themselves around the local markets/industries. They should, moreover, strengthen the promotion of local/regional markets. The current text touches upon global ones, making this section too broad.
- Section V, Paragraph 52: It could be more specific, building upon the HLPE report's recommendations in promoting:

- The strengthening of the links between urban consumers and farmers (recommendation 4.g. of the HLPE report)
- The facilitation of access to local markets for farmers (recommendation 4.f. of the HLPE report)

- Section V, Paragraphs 56 and 57: This recommendation should support mechanisms to address power imbalances starting from reinforcing existing legislation and extending it. Concentration of market control is already known and documented to be detrimental to small-scale farmers (see for instance the agency narrative of the HLPE report). This recommendation should acknowledge it and recommend appropriate regulation to contrast market concentration.

6) The current wording on the use of agrochemicals—such as “increasing efficiency of input use” and optimizing their use—is misleading and can lead to negative consequences by reinforcing unsustainable chemical dependencies in agricultural systems, resulting in the unabated continuation of the severe health and ecosystem damage seen today. Policy recommendations should prioritize replacing chemical pesticide use with comprehensive agroecological approaches to pest management, along with the immediate phaseout of highly hazardous pesticides and other measures to reduce overall system dependency on agrochemicals, including the elimination of perverse subsidies that encourage their continued use.

- Section II, Paragraph 20: Claims for optimizing the use of agrochemicals (the efficiency approach) have no basis in the HLPE report’s findings or its recommendations. An agroecological approach to crop management is well-established as the most robust available approach to conserving biodiversity and ecosystem health, the focus of this sub-section. This paragraph should be reframed completely around promoting ecological pest management and strengthening and enforcing regulations to reduce the use of and dependence on agrochemicals

7) The proposed new section on “other innovative approaches” should be framed and addressed by an assessment of their impacts on sustainable food systems, human rights, environment and economic conditions. The HLPE report has presented a good framework of assessment (or “performance metrics”), where innovations could be “evaluated” against criteria not only related to productivity, but also for example agency and ecological footprint. Finally, the proposed innovations should be shaped around the needs and expectations of small-scale family farmers and Indigenous Peoples:

- The preamble should state that in light of the increasingly well-documented power and decision asymmetries within food and agricultural value chains (including the ones presented under the “agency” terminology within the report), it is crucial that any innovation promoted within this decision box be weighted according to its contribution to the realization of the human right to food and nutrition and level of appropriateness, replicability and adaptability by Indigenous Peoples and small-scale food producers according to their social, environmental, cultural and political context.

- Section III: The concept of developing frameworks of monitoring and impact assessments is appreciated. However, this section remains very weak: the initial wording by the HLPE report was to “establish” and not “strengthen” comprehensive monitoring frameworks and performance measures.

- Section III, Paragraph 33: The ecological footprint should be mentioned.

8) The gender perspective is essential. In this sense, the document should recognize the centrality of women’s rights and the role of women in knowledge accumulation and agriculture production, as well as strengthen gender equality throughout. Gender transformative policies should relate to female autonomy and self-determination and the construction of spaces of equal participation between men and women by incorporating respect, care, solidarity, shared responsibility, by ensuring equal income and shared power, while putting an end to gender violence and sexism. They should also relate to

equal access to territories (land, water, forests, fishing, foraging, hunting) and public services. There should be a stronger emphasis on the need to involve women at all levels of decision making and all policies developed should adopt a “do no harm” approach. This will not be achieved without calling States to promote gender budgeting and financial support to feminist organizations, women farmers’ organizations and women’s collectives.

- Section V: We appreciate the reference to CEDAW. However, the document should refer to women’s rights rather than women’s needs. **Gender transformative policies should relate to female autonomy and self-determination and the construction of spaces of equal participation between men and women by incorporating respect, care, solidarity, shared responsibility, by ensuring equal income and shared power, while putting an end to gender violence and sexism. They should also relate to equal access to territories (land, water, forests, fishing, foraging, hunting) and public services. There should be a stronger emphasis on the need to involve women at all levels of decision making and all policies developed should adopt a “do no harm” approach.**
- Section V, Paragraph 54: This paragraph should include a specific mention to gender budgeting and financial support to feminist organizations, women farmers’ organizations and women’s collectives, which is key to “support gender transformative policies programmes and actions”.

9) **Young people should not be qualified only as entrepreneurs as this is a very narrow focus compared to the wide range of employment opportunities youth might prefer, including very innovative ways of obtaining a livelihood from farming. This should be supported with re-dignifying work in rural areas. Initiatives should be reoriented to build on the agency, leadership and self-determination of Youth, by enhancing their participation and inclusive engagement in decision-making processes.**

10) **The current draft does not address properly various governance issues, remaining too broad and not consistent enough. Instead, it should clearly recommend States to democratize agricultural and food governance at all levels, with a particular focus on increasing the active participation of small-scale producers in all decisions (way beyond the CFS) that affect them and shape agricultural and food systems.**

- The preamble should also state that given the fact that **small-scale food producers are the ones feeding the world but are, on the other hand the main victims of food insecurity**, it is crucial that any decision, innovation, policy, research, fora or initiative promoted within this decision box be:
 - Inclusive, participatory and the result of democratic choices, by enhancing the real participation of the most affected, vulnerable and marginalized groups – especially women - to decision making in all relevant areas;
 - Based on the protection, promotion and improvement of traditional Indigenous Peoples, local and small-scale farmers’ knowledge according to their environmental context and culture; and,
 - Accompanied by public measures establishing clear rules and mechanisms for preventing conflicts of interest in partnerships, investments and policy making.
- Section IV, Paragraphs 35, 36 and 41: There should be an inclusion of language that recalls States’ obligations to respect and protect indigenous peoples,’ small-scale food producers’ and local communities’ rights over their traditional knowledge, practices and innovations. While collaborative research and dialogues between different forms of knowledge is a good thing, measures need to be put in place to avoid appropriation of traditional knowledge and biopiracy.

11) **The language on policy coherence should be significantly strengthened and made more specific. Institutional and policy frameworks should foster cross-sectoral collaboration and coherence among sectoral policies (e.g. development, energy, trade, agriculture, investment,...) to ensure that policies having direct or indirect impacts on food systems do not undermine the right to food and do not hinder**

but instead support agroecology for a radical shift towards SFS. States should take the necessary steps for this at national and sub-national level, and also ensure coherence between their positions and policies promoted at regional and international level.

- *Section on “Next Steps”*: Regarding the proposed dialogue between WTO and CFS: the HLPE report had initially proposed a recommendation which should be re-explored “*explore ways for trade agreements and rules to better support transitions towards more sustainable agriculture and food systems*”. This original HLPE recommendation should be pursued, but rather than WTO – a body with little expertise in sustainable and equitable food systems – we propose to invite UNCTAD and the Special Rapporteur on the Right to Food as co-organizers with the CFS of such an exploration.

12) We would like to reaffirm the historical opportunity and call for the strengthening of the obvious synergy between this policy convergence process and the one on Food Systems and Nutrition, both to be concluded by 2020. In this sense, the concept of “healthy and sustainable diets” should be maintained in this document, as it makes clear that the sustainability and health dimension must go hand in hand. The concept could be further improved by adding the social justice dimension (e.g., the diets we aim for should not be built on exploitation of food producers including workers, and ensure fair prices/decent wages, working and living conditions, social protection, etc. for them).

13) The CSM understands that what is being referred to a UN Food Systems Summit is an independent initiative of the UN Secretary General to raise political attention on the critical role that the transformation of food systems may play on multiple dimensions of the 2030 Agenda for Sustainable Development. It will be a political initiative of symbolic value, but with no direct normative implications in terms of policies, programmes and institutions. Therefore, **the Policy Recommendations** should not be mentioning the upcoming UN Food Systems Summit as **an equal level** process they would build upon (Paragraph 9), or influence (Paragraphs 58, 59 and 60). It needs to be clear that the Summit would be expected to reflect, share and amplify the democratic decisions of UN Members States in their legitimate institutions. The emphasis should be on generating the necessary high-level political attention for these Policy Recommendations to be transformed into actions.