

## CSM Comments on Zero Draft HLPE Report on Agroecological Approaches (...)

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19 November 2018

*This document conveys the comments of the Agroecology Working Group of the Civil Society Mechanism (CSM) for relations with the CFS. Despite the language restriction (the English-only text significantly limits the capacity of non-English speaking constituencies to participate in this important step), this document conveys the collective comments of the broad array of civil society constituencies that actively participate in the CSM WG process.*

### 1. Overarching Comments (as already provided on November 12)

The CSM attaches great importance to this HLPE Report and the related workstream. However, the CSM is deeply concerned with the Zero Draft. Its actual focus on Agroecology is weak, inconsistent and inadequate to the CFS mandate, where agroecology was clearly singled out among the other innovations. On the contrary, the Zero Draft's prime emphasis is on "innovations" for sustainable food systems, with a far too weak reference to the CFS vision related to the progressive realization of the Right to Adequate Food to ensure Food Security and Nutrition (FSN). The draft introduces many other approaches without really exploring the reasons for their inclusion and actually neglecting to explore how some of these "other approaches" are the primary drivers of the dynamics of dispossession, marginalization, environmental degradation, biodiversity loss as well as malnutrition and disease. In this context, the draft somehow blends all these approaches together into a mish-mash notion of "sustainable food system", leading to very broad and weak recommendations for policy makers. In this context, the CSM would like to put forward the following five overarching comments and suggestions for the review of the Zero Draft:

1. **The centrality of peasants' and indigenous peoples' agency in the genesis of agroecology need to be properly recognized.** The Zero Draft's description of agroecology emerges from the surveying of scientific literature and does not recognise the co-evolution of science, practice, and movement, which has been developing over millennia, with older forms of indigenous and peasant agroecology pre-existing formal sciences. It is therefore essential to clarify the historical genesis of agroecology as a peasant and indigenous peoples' movement that has blended together different forms of knowledge within its practice in the territories where it has evolved. The direct agency of peasants and indigenous peoples and the systemic implications within their territories should therefore be explicitly highlighted;
2. **The concept of innovation needs to be de-coupled from technology and primarily related to advancing Food Security and Nutrition.** Despite the initial definitions, innovations are primarily framed in terms of technological advancement and the motives and drivers of these innovations are not explicitly recognised. Innovations should be considered as creative responses to challenging conditions and/or the mix of processes and practices that promote transitions to a new desired state. In the CFS context, the only innovations that should be considered are those whose explicit motive is the realization of the right to adequate food and the pursuit of food security and nutrition. It is also essential to differentiate between systemic innovations that aim to address the root causes of food insecurity and malnutrition in all its forms, and more specific innovations of limited scope that only mitigate symptomatic effects. In this context, the relations between agroecology and such a broader and more holistic understanding of innovation need to be clearly articulated, while also explicitly differentiating between innovations that promote shared knowledge and socialize their benefits and those innovations that generate asymmetry of knowledge and facilitate the concentration of power;
3. **The human rights framework, and particularly the Right to Adequate Food and Nutrition, should be the foundational pillar of the Report's analysis and assessment.** Agroecology and other approaches should be primarily assessed with respect to their capacity to advance the progressive realization of the

RtAFN and the agenda towards food security and nutrition. In this respect, the CSM would like to challenge the excessive focus of the Zero Draft on improving the sustainability of food systems, as the latter is not the ultimate objective. Any approaches that fail to meet these fundamental criteria should either be excluded from the Report or exposed in all their shortcomings. The centrality of human rights also leads to upholding the centrality of people and their agency and therefore to the need to apply adequate power analysis to expose if innovations lead to power and wealth concentrations that undermine people's sovereignty;

4. **The assessment framework should clearly enable policy makers to take informed decisions on which approaches need to be supported with public policies and investments.** The HLPE Report should serve a policy making objective rather than a scientifically-descriptive objective. The current assessment matrix is too confused and complex to be able to clearly support policy making. The CSM would like to propose three fundamental changes:

- a) Firstly, the Zero Draft details many different approaches and this is both inadequate and misleading. In the CSM analysis, many of these approaches are neither systemic nor meet the above-indicated criteria. Furthermore, climate-smart agriculture, nutrition-sensitive agriculture, sustainable intensification and value-chain approaches are all technical strategies employed by industrial systems, rather than being separate entities. These should all be compacted together under "industrial system innovations", as this can expose the different direction of innovation between smallholder systems and industrial systems. Reducing the number of "approaches" is the first fundamental step in making the assessment framework understandable and useful for policy making;
- b) Secondly, the assessment criteria that are proposed are far too many, uneven in importance and confusing at best. The CSM would like to propose that the criteria would be limited to the following:
  - a. Scope of the approach (systemic/specific);
  - b. Primary agency and power implications;
  - c. Human rights assessment, particularly with respect to the RtAFN;
  - d. Contribution to FSN (with reference to the four pillars and healthy/sustainable diets);
  - e. HLPE evaluation principles (resource efficiency, resilience, social equity/responsibility, environmental footprint).

Reducing the criteria to a set of well-established principles, combined with the compacting of the approaches, would provide much more understandable and useful outcomes for policy making. We are deeply convinced that agroecology would clearly feature its complete responsiveness to all these criteria and expect the Report to expose this fact in unambiguous terms;

- c) Thirdly, the assessment framework should clearly expose the tensions and challenges related to the co-habitation/coexistence between the approaches being compared;

5. **The Report should provide clear and substantive proposals on how to strengthen Agroecology as well as those approaches that may prove equally conducive to the realization of the RtAFN and FSN.** The Zero Draft is excessively focused on the descriptive and analytical side, while its normative contribution remains limited with fairly weak and unsubstantiated policy recommendations. It is essential that the HLPE assessment of the various approaches be followed by a much deeper articulation of key options, in terms of public policies and investments, that policy makers can employ to strengthen agroecology and other valuable approaches. At the same time, it is equally essential that the Report exposes current policies and investments that undermine agroecology and other valuable approaches. Ultimately, the Report needs to inspire and support a policy convergence process. While the analysis is an important contribution, as mentioned above, the usefulness of the Report is also that of highlighting concrete policy options that policy makers can consider, in terms of both new approaches that appear to be promising and discontinuation of those that are proving inadequate.

## **2. Key Substantive Comments**

The following comments address particular CSM concerns related to either the conceptual framework or the actual conclusions featured by the Zero Draft.

### ***Highlighting Issues of Agency, Inequalities, Power and Political Economies***

- The Zero Draft features a weak analysis of the agency that underpins the different innovations being assessed and whether these (claimed) innovations address structural inequalities and positively change power dynamics. In this respect, the Zero Draft also fails to contextualize its analysis in the current situation of marginalization and food insecurity of many people and their communities. It is essential to remind the HLPE that small-scale producers are currently feeding the world, while being the most affected to various forms of vulnerabilities. Agroecology promotes the solutions that would best strengthen their livelihoods and resilience while also addressing the larger societal and developmental challenges around them. It is therefore essential to assess innovations in the context of an adequate analysis of power dynamics and a proper assessment of political economies;
- The Zero Draft focuses almost exclusively on farming. However, agroecology has co-evolved with and has been embraced by movements and organizations of small-scale fishers, pastoralists and other small-scale food producers. The livestock issue is largely unaddressed, including how agroecological livestock management tackles the divorce between agriculture and livestock generated by mono-cropping and excessive specialization. The environmental, social and economic impacts of agroecological livestock management by small-scale mixed farming systems should therefore be better explored;
- It is surprising that the role of women and youth is only highlighted at the end of the document, in a single paragraph. Women's rights, gender equality and intergenerational issues (especially rural youth) are essential when we talk about FSN, sustainability and agroecology. As it stands, the draft only speaks about gender equity and women's empowerment, without referring to women's rights, and therefore falls short in addressing structural and systemic discrimination of women. It also largely relates to youth in terms of entrepreneurship, which is a biased and limiting framework to address youth agency;
- The HLPE Report should expose how women constructed a collective identity as subjects of rights, rendered invisible and denied to them, and contributed to transforming social relations of production and reproduction in the rural and urban world. For agroecology to reach its full potential, the equitable distribution of power, tasks, decision-making and remuneration must be guaranteed. Agroecology therefore allows women to overcome many of the dichotomies that today strengthen the sexual division of labour and make women's work invisible.

### ***Unveiling Profoundly Different Food System Visions, Pathways and Strategies***

- The weak assessment framework exposed by Zero Draft fails to unveil the profoundly different socio-economic pathways and strategies employed by agroecology if compared to the claimed innovations promoted by the industrial systems, for instance:
  - i. Circular economies versus heavy dependence on external inputs;
  - ii. Diversification based on agrobiodiversity versus specialization based on monocropping of limited varieties;
  - iii. Local territorial markets deeply embedded in horizontal relations within the local economy versus maximum integration in global markets with limited and vertical relations with the local economy;
- To inform policy choices and actions to reshape food systems and advance to their sustainability, the assessment of every strategy/model has to consider its social, cultural, environmental, political and economic impacts and this requires a holistic and multidisciplinary approach. Consistently with past HLPE Reports (i.e. 2014), this includes an understanding of the various elements comprising food systems

(environment, people, inputs, processes, infrastructure, institutions, etc.) and the full spectrum from pre-production and production to processing, packaging, transport, distribution, marketing, preparation, consumption, and waste management. To transform these systems is not only about introducing new, breakthrough or disruptive innovations, and new needs, markets and application spaces. It also entails the adaptation or evolution, and the substantial improvement and/or expansion, of already existing techniques and practices. In this respect, the HLPE may need to adjust the elements to be considered within its evaluation principles (resource efficiency, resilience, social equity/responsibility, environmental footprint) as detailed below;

- The assessment of the social, economic and institutional dimensions should answer the following questions, among others:
  - a) How participatory is governance? Is there accountability, transparency, predictability, information and the rule of law? Do citizens participate in decision-making, management practices of natural resources in an equitable and sustainable manner, and monitoring and evaluation processes? Are bottom-up approaches and processes included, in particular for creation of knowledge? Is the prominent role given to the most vulnerable and marginalized, including small-scale producers, workers, indigenous peoples, urban poor, women and youth?
  - b) Are social and economic justice being promoted? Are the economic inclusion and social cohesion being strengthened? Are livelihoods being improved, actively reducing inequalities? Are relationships and solidarity among rural and urban areas and generations being encouraged and consolidated? Is there support for social and public models of ownership that benefit all, encourage collaborative and open source intellectual rights held in common? Are social and solidarity economies being fostered as well as the connection between producers and consumers through equitable and sustainable markets? Is cultural heritage preserved and promoted?
  - c) Is it contributing to the eradication of hunger? Will it ensure sufficient future food supplies and equal access to meet the needs of the world's population?
  - d) Is the consumption of diverse, nutritious, safe foods for healthy, diversified, culturally appropriate and sustainable diets being promoted? Is transparent information on health risks and benefits associated with the different types of food and consumption patterns available? Will it contribute to decrease in non-communicable diet-related diseases? Does it recognize traditional medicines?
  - e) Will it benefit small-scale food producers and workers? Will it create decent employment opportunities, especially in rural areas and for youth? Will it contribute to dignified living conditions? Will it improve and respect workers' rights? Will it guarantee access to natural resources, infrastructure, markets and information for small-scale food producers? Will it recognize and preserve their knowledge?
  - f) Is it promoting gender justice and diversity? Is it recognizing and valorizing women's productive and reproductive work? Is it promoting women's equal rights and access to resources? Is there effective participation in decision-making and support for women's leadership? Will it contribute to eradicate all forms of violence and oppression against women? Will it respect sexual and reproductive health rights?
- To assess the dependence to external (chemical) inputs or circular economy, the following key questions would help:
  - g) Is it helping to decouple agriculture from fossil fuel/petroleum/non-renewable energy? Is it considering the systems and types of energy production, distribution and consumption to create, deploy and operate the strategy?
  - h) Does it minimize the social and environmental impacts of energy? Does it ensure fair and sufficient access to sustainably produced energy for the most vulnerable and marginalized? Does it ensure community or social ownership of energy?

- i) Does it eliminate the use of non-renewable, off-farm human inputs that have the potential to harm the environment or the health of farmers, farm workers, or consumers?
- j) Does it mainly rely on resources within the agro-ecosystem, including nearby communities, by replacing external inputs with nutrient cycling, better conservation, and an expanded base of ecological knowledge?
- k) Does it have minimal negative effects on the environment and release insignificant amounts of toxic or damaging substances into the atmosphere, surface water, or groundwater?
- Regarding the specialization or diversification dimension, the issue of resilience (including the diversification of incomes) should be addressed. The following questions may help:
  - l) Does it promote integrated and diversified systems?
  - m) Does it attempt to increase resilience by integrating and diversifying (genetic resources, landscapes, breeds, integrated systems, etc.) different farming systems (plants, animals, crops, etc.) at local and landscape levels?
  - n) Does it re-establish the biological relationships that can occur naturally on the farm instead of reducing and simplifying them?
- Regarding the types of market and economic relations, it is essential to note that “The term ‘territorial markets’ serves to underscore the reality that most food in the world is produced, processed, traded or distributed and consumed within a given territory. These markets, which channel 80% of the food consumed in the world, are largely ignored by public statistics and policies, and provide a range of social, cultural and nutritional functions in addition to economic ones (CSM, 2016)”. By improving social and working conditions, increasing labour opportunities, securing incomes for small-scale producers, and stimulating and diversifying local economies, these markets strengthen the socioeconomic viability of agroecology and retain and redistribute wealth within territories. Experience demonstrates that smallholders and territorial markets are in many respects better equipped to deal with global challenges than global commodity markets. This is largely due to the multi-functionality of territorial markets involving smallholder agriculture and diversified farming systems. Multiple marketing channels for selling and accessing food, with the possibility of relying on home-grown food or short circuits when this is the best option, mean that producers in territorial markets are less vulnerable to price swings in international markets and the breakdown of long, centralized agro-food chains, as happened during the 2007–2008 food crisis (CSM, 2016). Finally, these markets also contribute to reducing greenhouse gas emissions associated with energy use (e.g. for transport and refrigeration) and thus to reducing the effects of climate change);
- It is also very important to assess the aspects related to implementation. The following questions would help in this respect:
  - o) Availability and affordability: Does it allow access to all individuals and institutions across scales and geographies? Does it take into consideration and lower the financial and non-financial resources needed to create, promote and distribute, as well as to replicate, purchase, participate in, or use it?
  - p) Usability and time sustainability: Are the adoption, use and replication simple, ease and length of time? What amount of training or transmission of information is required for the end-users to effectively utilize it? How effective is at accomplishing its intended task in the short- and long-term, and ability for user to sustain it without external support? Does it has correspondence to the needs, circumstances and culture of small-scale food producers and their communities?
  - q) Scalability: Does it have ability to achieve widespread adoption across scales and geographies, with positive impact?

### ***Recognising the Systemic Nature of the Sustainability, Biodiversity and Climate Change Challenge***

- The mention and definition of "sustainability" appears too late in the Zero Draft and would rather need to be introduced upfront to better frame and assess innovations. In this respect, a systemic notion of sustainability needs to be deeply embedded in the assessment framework to avoid reductive approaches to food security and nutrition that may artificially separate it from its ecological and environmental foundations;
- Climate change (and other man-made crises) gets a limited coverage despite being a key driver of food insecurity and the urgency of the climate crisis is not well reflected in the report. The IPCC 1.5 Report clearly highlights the need for radical and urgent shift in the ways our societies are organized, and food systems are a critical domain of such an adjustment. Any proposed innovation should be weighed according to its impact on climate change as well as its capacity to strengthen resilience to changing climate conditions, going beyond seductive narrative and looking into the reality of some of the false solutions being proposed. In this context, the levels of dependency of different types of food systems on fossil fuels need to be taken into full account;
- In addition to climate change there is the ever-growing crisis induced by the man-made environmental and biodiversity collapse. Several planetary boundaries have been crossed and primary drivers of this situation are closely related to agriculture, endangering the capacity of our ecosystem to continue to produce food. Several recent assessments published by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) should be used as reference in this respect;
- The Zero Draft lacks the clear mentioning of the precaution principle of the CBD among its key principles, despite its central role when dealing with innovation and biotechnology. And the Report needs to crystal clear with respect to the principles of Agroecology, making it clear that genetic manipulation is not at all possible for an Agroecology approach which is looking to work with not against nature;
- Once again, the HLPE may need to strengthen its evaluation principles (resource efficiency, resilience, social equity/responsibility, environmental footprint) by including key questions such as: Does the propose innovation minimize food loss and waste? Does it minimize the transport involved in food production and distribution and the associated environmental impacts though localized or re-localized food systems? Does it consider the short and long-term impacts on the environment (soils, water, air, land, forests and other natural resources) of it use, over and after its lifespan? Does it have the ability to preserve biodiversity and water? Does it address key labour rights and working conditions in food production, including for migrant farm workers? Does it address root causes of climate change based on agriculture models? Does it strengthen the resilience against future shocks and support to communities? Does it reinforce autonomy for reconstruction after shocks? Does it promote/implement mitigation measures through the reduction of greenhouse gas emissions from current agriculture and food systems models?
- **In terms of all these criteria, the Zero Draft fails to expose how agroecology proposes systemic solutions across all these domains that address the underlying structural causes of multiple sustainability challenges, whereas many "claimed innovations" embedded in industrial systems fail to do so.**

### ***Tackling the Malnutrition Challenge and Promoting Healthy and Sustainable Diets***

- Despite the last HLPE Report having focused entirely on this subject, the narrative on food systems and nutrition and the centrality of the "dietary question" is largely insufficient in the Zero Draft. Reference to diets are scarce and vague. There is also no mentioning of cultural diets, local diets, seasonal diets and traditional diets. As a result, the Zero Draft does not embrace any clear definition of what is a sustainable, healthy and diverse diet among its conceptual elements, exposing that the health/nutrition implications

of the innovations being assessed are completely unaddressed. This need to be entirely rectified, particularly given the mounting evidence that calls to re-embed nutrition within food systems to tackle malnutrition in all its forms (including latest SOFI Reports) and the intergovernmental policy initiatives in this respect (ICN2, CFS Guidelines). The pursuit of diversified, nutritious and culturally acceptable diets should therefore guide any innovations discussed by the HLPE. This would also provide an important contribution to the process towards CFS Guidelines on Food Systems and Nutrition;

- In this context, it is also problematic that nutrition is mainly addressed in the context of nutrition-sensitive agriculture, which tends to apply a technical perspective, focused on (micro-)nutrients, and which includes bio-fortification. It is unacceptable that nutrition is only addressed (inadequately) in this section, while it should be among the key framing issues weighing the pertinence of all the innovations proposed within this report. This therefore fails to expose the critical contribution provided by agroecology to healthy and sustainable diets;
- Regarding Nutrition-Sensitive Agriculture, it is not clear what exactly this means in terms of innovation. The focus is largely placed on technical solutions that could tackle micronutrient deficiencies. The HLPE needs to be reminded that nutrient deficiencies does not equal nutrition, that micronutrient deficiencies is not always the result of a lack of nutrients in food, and that biofortification and fortification has shown several limits that need to be presented in the report. On the contrary, the critical contribution that food diversification, based on agrobiodiverse local food systems, provides in tackling the malnutrition challenge remains unexposed by the Zero Draft;
- The revised Report should adequately capture the nutritional dimension of food systems and the numerous pathways through which agroecology and other agricultural innovations can either address or contribution to malnutrition. The previous HLPE report of Food Systems and Nutrition could be used here as a reference. **In this context, the systemic contribution of agroecology to diverse, healthy and sustainable diets needs to be clearly highlighted against false industrial solutions.**

### ***Problematizing the inadequate treatment of Genetically Modified Organisms***

- It is not clear why the section on Genetically Modified Organisms (GMOs) is included in the Zero Draft. There are sufficient arguments to state that GMOs are not a sustainable solution to achieve FSN. The related section (3.2.6 in the Zero Draft) is also largely not up-to-date. The case example on BT cotton in Burkina Faso given in Box 15 does not mention that BT cotton spectacularly failed in the country and is no longer produced since 2017. The section does also not mention newer generation GMOs, i.e. new techniques of gene editing, including mutagenesis, and others. These, together with patents on native traits, have enormous detrimental implications for FSN.
- The “divergent narrative” on GMOs suffers from the analytical flaws identified above. In addition, the authors take up an extraordinarily disproportionate amount of space in simply describing GMOs (crop acreage, etc), in a section that is rife with inaccuracies. Furthermore, the section falls into the unhelpful pattern of oversimplifying and inaccurately stating the supposed views of proponents and critics, with a clear bias towards taking at face value proponents’ claims of benefits – typically narrowly discussed as single crop yield/unit area, with a corresponding tendency to dismiss the concerns ascribed to a generalized “public” as motivated by fear and misunderstanding, while ignoring the vast body of scientific and empirical evidence behind the ecological, social, economic and political critiques of GMO-centred agricultural systems;
- The question that is theoretically posed in this section (“can GMOs be part of SFS?”) is never addressed in any meaningful way, nor is the question about “GMOs’ relationship to agroecology”. It is also questionable to try to evaluate “GMOs” as if the organisms — the engineered seeds themselves — are at issue. Rather, it is the larger system in which the seeds are situated (e.g. the typically pesticide-intensive monocultural cropping system in which these seeds are introduced, the intellectual property

systems surrounding their introduction, the market structure as affected by corporate mergers and consolidation, along with corresponding corporate power and influence over public agencies, research and extension, etc.) that requires examination;

- It is therefore profoundly questionable whether any discussion of GMOs or GMO-based systems is necessary at all, in a report which should be devoting its full attention to agroecology and those innovation approaches that support equitable and sustainable food systems. The comprehensive IAASTD (2008) assessment has already reviewed the evidence regarding actual and potential contributions of “modern biotechnologies” including GMOs to equitable and sustainable development, and found them negligible, noting that these types of technologies “have primarily benefited the better-resourced groups in society and transnational corporations, rather than the most vulnerable ones”.

### 3. Comments on Recommendations

In view of all comments featured in this submission, the CSM does not consider the proposed set of recommendations within the Zero Draft to be adequate to the mandate that was provided to the HLPE. It is therefore impossible for the CSM to provide comments on the proposed recommendations as they would need to be profoundly revised in view of the comments being provided. However, the CSM reiterates the indications included in the overarching comments and calls on the HLPE to ensure a much deeper articulation of key options, in terms of public policies and investments, that policy makers can employ to strengthen agroecology and other valuable approaches. The CSM will provide its own proposal, in terms of proposed policy recommendations, later in the HLPE process so that these could be considered when the Steering Group and Project Team reach that particular point in the Report re-drafting process.

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