This document conveys the preliminary collective response of the Civil Society and Indigenous People’s Mechanism (CSM) to the First 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 movements, organizations and networks from all CSM constituencies (132 people in total).

“Land determines our identity as human beings, our dignity, our sense of belonging. Food is a basic human right, not a commodity. Food defines our culture and heritage: a source of nutrition and health, a medicine, a ritual, a celebration.”- Representative from Alliance for Food Sovereignty in Africa (AFSA)

The Civil Society and Indigenous Peoples’ Mechanism (CSM) welcomes the First Draft of the Policy Recommendations on Agroecological and Other Innovative Approaches and acknowledges the visible effort in improving the document from the previous draft and responding to at least some of the concerns raised by the CSM. We equally acknowledge the closer articulation between this document and the findings from the HLPE report. We hope that this draft can serve as benchmark for the final negotiated version.

In view of the upcoming negotiations, we acknowledge the recognition of the need for a radical transformation of our food system, and the greater emphasis made on the centrality of human rights in assessing and reshaping future food system(s). The COVID19 pandemic has made clear how the current intensive and industrial agricultural model has devastated ecosystems and created the enabling conditions for this kind of outbreak. The crisis has shown the necessity to strengthen the public sector and center the role of the State in developing public policies and providing public services to respect, protect and fulfil the right to health and the right to adequate food for all.

Moreover, the multifaceted crisis generated by the pandemic has exposed the urgency of enhancing local food systems from ecological, social and health perspectives. It is essential to adopt a systematic approach that goes beyond the One Health approach. We believe that a food systems approach should be taken for the recommendations, acknowledging the fact that different food systems have differential impacts or benefices. Referring to the CFS Voluntary Guidelines on Food Systems and Nutrition along the entire document is, therefore, of utmost importance.

The CSM would like to once again highlight the importance of these recommendations and express our deep commitment to this process at the extent of its relevance for advancing the right to food for all and transitioning towards sustainable food systems that support the livelihoods and daily work of our constituencies and preserve ecosystems. In this sense, the CSM reaffirms that agroecology has the power and potential to drive the much-needed transformation of our food systems.

1) Transforming food systems through pathways that prioritize agroecology as practice, knowledge and movement

Practices based on ecological principles

The HLPE report on Agroecological and other innovative approaches has demonstrated that agroecological approaches meet all the principles outlined with regard to advancing sustainable food systems for food security and nutrition (Table 4, HLPE 2019). Moreover, the HLPE on Building a Global Narrative towards 2030 has recognized agroecology as a sustainable practice that addresses climate
change, ecosystem degradation and equity among food system participants by promoting agency and the right to food, especially for vulnerable and marginalized people.

The first draft still suffers from incoherence deriving from the forced co-existence between agroecology and other unsustainable approaches and we see an incomplete narrative, which does not differentiate upon which innovations can be transformative and which ones are not. In this sense, the document does not differentiate agroecology as the preferable solution for the transition to a sustainable food system due to its potential to provide a systemic holistic pathway towards sustainability.

Despite having clear evidence in HLPE report that agroecology is not operating in a level playing field and that the share of support going to any sustainable agriculture efforts is minuscule compared to the incredible support to industrial agriculture, the recommendations does not have a specific call asking states to create a level playing field, by providing equal incentives to all approaches or taking away incentives for other kind of agriculture. In this sense, we believe that the Draft needs to strengthen the narrative around the asymmetry of power relations and their consequences. The preamble should clearly recognize this challenge, with a resultant recommendation suggesting targeted investment to address power inequalities in agriculture and food system, as first and foremost, responsibility of the state.

The fact that not all the approaches contribute to sustainability, slightly mentioned in p.4, points 11 - 14, and specifically last sentences in 11 and 14, should come out much stronger to point Governments towards the clear direction to which the mentioned transformational change should actually happen.

The continued use of sustainable agriculture without qualifying what actually is, contributes to the confusion around multiple approaches that are not sustainable at all. Therefore, the recommendations should help governments to identify what sustainable agriculture should look like by anchoring to the 10 agroecology elements/principles as bedrock/reference for any “sustainable agriculture model”

- **Pesticides:**
  The contradiction is evident in the way the first draft deals with the issue of agrochemicals and pesticides. Preserving biodiversity cannot co-exists with the “responsible” use of agrochemicals for example. The focus on phasing out pesticides should be much stronger/clearer as the continued focus on "responsible use" has no clear definition or meaning. The “urgent necessity” we face is not to continue use of agrochemicals, but the opposite, namely, to reduce and eliminate dependency on agrochemicals, both for the protection and improvement of human, animal, environmental and ecosystem health, and to reduce agriculture’s significant contributions to today’s climate and biodiversity crises.

  The recommendations can on the contrary recommend raising policymaker and public awareness of the existence, economic viability and positive contribution to human, animal, environmental and ecosystem health of non-chemical, agroecological approaches to pest, soil and cropping system management. The approach to chemicals should be to “Establish a coherent and coordinated policy framework to reduce and eliminate dependency on agrochemicals and establish agroecological approaches to pest and crop management, that includes the removal of subsidies for synthetic chemical inputs and the redirection of investments and incentives towards innovative agroecological approaches.”

**Co-generation of knowledge (Diálogo de saberes)**

The first draft continues to use a very narrow framing of “innovation”, equalling it with modern, technological innovation. This falls short of reaffirming the role of small-scale food producers and indigenous peoples as drivers of innovation for centuries, and owners of knowledge under the broader
understanding of science and research, which is not focused exclusively on modern, Western conceptions. While we acknowledge the inclusion of a culture and context specific approach, we believe that the document still misses the fact that any decision, innovation, policy, research, fora or initiative promoted should be inclusive and the result of democratic choices, as well as based on the promotion and improvement of local, indigenous and small scale producers’ knowledge.

The draft should also recommend to respect and protect the rights of small-scale food producers in the context of research, including participatory research. There are serious issues of biopiracy, intellectual property rights, benefit sharing etc., which need to be addressed through legal measures as well as monitoring and accountability mechanisms.

**Public policies supporting agroecology as social and political movement**

We appreciate the stronger focus on small-scale food producers and family farming but believe that the wording on such a focus could be reinforced at the end of the preamble.

In several recommendations, several actors (states, private sector, research, food producers’ organizations, CSOs etc.) are thrown together, and this is a kind of multi-stakeholderism that does not clearly speak about public policies and falls short of ensuring accountability by duty holders to the rights holders. As many recommendations refer to public policies (except for awareness raising), they should therefore be directed to States including the emphasis on public research. In this sense, the recommendations should reaffirm the role of States as primary administrators, financers, researchers and planners regarding agricultural innovations. While we recognize the systematic mention of small and medium sized enterprises in the recommendations targeting private sectors, we believe that the role of public services for an effective transformation of agricultural and food systems should be pushed forward more clearly with the recommendations systematically differentiating states and public services from non-state actors. This would clarify the roles and responsibilities of each constituency and would guarantee a more concrete implementation of the recommendations.

Overall, the recommendations should be improved to strengthen topics on: a) specific local legislation, b) education in the field, c) technical assistance and research consistent with agroecology and with their own resources, d) agroecological-based urban agriculture and e) markets; taking into account that many agencies that encourage sustainable agriculture and access to land are being phased out due to state reforms with an economic and fiscal bias.

- **Human rights**

  We see the improvement in recognizing the centrality of human rights in any framework underpinning a sustainable food system, in particular for their promotion through different entry points within the preamble of the document and the mention of international legal frameworks including UNDROP, UNDRIP, as well as Voluntary Guidelines to Support the Progressive Realization of the Right to Adequate Food in the Context of National Food Security. However, the clear mention of women’s rights, and the recognition of the collective rights of indigenous peoples in self-determining themselves through practicing agroecology are still missing. The draft must also clearly mention agricultural workers’ rights especially after the COVID19 has shown how the rights of these essential workers’ have been violated in the name of productivity and profit at the expense of theirs and public health.

  We want to reiterate that if the rights of the most affected are not met, we won’t have transformation of food systems, and only a food system anchored to the Right to food framework will allow us to achieve the SDG goal of eradicating hunger. In this sense, a specific reference to right to food and nutrition security should be included in the preamble itself.

- **Access to markets:**
Improving access to markets for products derived from agroecology and more strongly encourage support the development of short circuits would support the livelihoods of small-scale food producers and workers while also ensuring people can continue to access food that contributes both to human and planetary health. In this sense, we welcome the reference to the CFS policy recommendations on connecting smallholders to markets and we think we can draw clearer and agreed language from there when addressing markets. We believe that it is extremely important for the focus to be on promoting and supporting territorial markets, in particular for Recommendation 3 (n), where the reference to the private sector should be taken out to rephrase it towards public support to small-scale food producers’ practices. The document should also differentiate local and international markets.

2) **Digitalization:**
The political economies associated to who owns and controls digital technologies need to be deeply analysed 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 adapted.

While it is positive to see a recommendation asking that CFS should ask HLPE to review evidence of benefits and challenges of digitalization for sustainable agriculture and food systems, recognizing that “the potential positive and negative impacts of digitalization on food security and nutrition require attention”, we are concerned about the inclusion of the paragraphs on promoting digitalization (Recommendation 3 points s, t, u and v) and the lack of mention of addressing the negative impacts (e.g. the digital sequencing of seeds, which allows for new forms of biopiracy) in recommendation 4.

In this sense, we believe that the whole set of recommendations on digitalization need to be removed, as digitalization was not covered by the HLPE report. In addition, we are concerned about digitalization being the only innovation mentioned and promoted by name clearly creating a disbalance and potential preference. Moreover, it would be important to add that the use of digital tools and platforms take place in contexts of existing discrimination and inequalities; using new tools will not make these structural issues disappear (Paragraph 13).

3) **Monitoring, assessment frameworks:**
The CSM welcomes the mention and support for the “ecological footprint” concept.

On the other hand, while the different criteria to assess innovations are listed in the preamble, we regret the lack of attempt to translate the results of the criteria’s application. Although there is clear mention of the HLPE analysis grid in the document, as it stands currently and incoherently enough, the First Draft does not “weigh” the different innovations and seems to suggest that they all stand on an equal footing (e.g. there is no mention of different co-benefices or negative impacts).

It is equally important that any innovation promoted through this document be weighted according to its level of appropriation, replication and adaptation by local communities. Farmers and producers’ organizations should be considered as the first representatives and implementers of the promoted innovations. Their main role in food systems and in territorial planning should also be emphasized.

We believe that the reference to the TEEB-AgriFood framework should be removed, and at the most moving it to a footnote, since it is not something suggested by the HLPE.