

Preliminary CSM Comments on the HLPE Zero Draft Report on “Sustainable Agricultural Development for Food Security and Nutrition, including the Role of Livestock” – October 2015

This document conveys the preliminary comments of the Civil Society Mechanism (CSM) on the Zero Draft of the HLPE Report. Given the short deadline for comments, the language restriction (text only in English) and the time needed to adequately consult within social movements, including alliances of nomadic peoples, peasants, women in agriculture, indigenous peoples, landless, migrants, agriculture workers and those representing the workers in the meat processing chain, this document features concise comments, which will be followed by more detailed feedback in November.

I. Overarching comments

While acknowledging the significant work for the preparation of the Zero Draft, the CSM is deeply troubled by the significant bias of the current draft report and the lack of fair and balanced representation of the full spectrum of productive systems and their economic, social, ecological and political implications. On the contrary, the report should expose an independent, comprehensive, balanced and inclusive assessment of the situation. This is particularly alarming, as a biased analysis will obviously lead to equally biased recommendations, prejudicing the subsequent normative processes within the CFS. The CSM is particularly concerned by the narrative exposed by the current version and strongly believes that the next draft would require a significant re-orientation if it is to fulfil the mandate of the HLPE. We articulate the CSM's overarching concerns and comments below as well as include constructive proposals on how to re-articulate the next draft in the closing section of this document:

1. **Lack of contextualization in the CFS mandate and human rights framework:** Despite the title, the report fails to adequately locate sustainable agriculture, including livestock, within the context of the mandate of the CFS. First, the report appears to be much more driven by the conventional development of the sector rather than by the desire to explore how such development can become a critical pillar to address Food Security and Nutrition (FSN). Secondly, when referred to, FSN is addressed as a need to be met by the market rather than as a fundamental right. Indeed, there is no mention, in the entire document, of the Right to Adequate Food and Nutrition, nor other human rights, despite these being one of the central pillars of the Global Strategic Framework (GSF) of the CFS. Thirdly, smallholders, another central pillar of the CFS and its GSF, are portrayed as a marginal and unproductive category;
2. **Mischaracterization of Food Sovereignty and Agroecology:** The lack of reference to rights and the non-centrality of smallholders contributes to the profound mischaracterization of Food Sovereignty, which is merely introduced as an intellectual debate in a box. Similarly, Agroecology (rarely referred to explicitly in the report) seems to be solely considered as one among many techniques under the umbrella of sustainable agriculture. On the contrary, both these conceptualizations (Food Sovereignty and Agroecology) embody a political vision of productive systems and socio-economic relations that is profoundly alternative and antithetic

to the hegemonic and homogenizing paradigm of the global food system based on industrial agriculture and the corporatized food industry;

3. **False narrative on the grand challenge of feeding the planet and focus on Yield Gaps:** The report reiterates the grand narrative of feeding a growing planet and constructs the myth of the pressing demand for food that urgently requires a “productivity” revolution. This narrative is false and misleading. The reality is that there is no shortage of food, nor is this the key problem contributing to food security. In addition, global food loss and waste account for approximately one third of the edible parts of food produced for human consumption and derive largely from the agro-industrial model of production. Family farmers, especially small-scale farmers and food producers, feed 70 percent of the world population and are the main investors in agriculture. The challenge of feeding a growing planet should therefore be based on the centrality of smallholders, as recognized by the GSF, rather than on their mischaracterization as a marginal and unproductive category. Furthermore, despite referencing three typologies of countries, three different agricultural development trajectories and four livestock “systems”, these categories (particularly of the four livestock systems are hardly analysed in the context of FSN and sustainability. The overarching emphasis of the framework is focused on “yield gaps” to meet FAO’s projections of rising meat demand by 2050;
4. **Aggregate view of the impacts of the livestock sector hides the fundamental ecological footprint of different production models, with no reference to agroecology:** While introducing some classifications, the conceptual framework of the report addresses the livestock sector as one entity and describes its aggregated impact in terms of unsustainable use of natural resources, health risks and social concerns. Again, this is a misconstrued narrative. These negative consequences are mainly the direct implications of the industrial-intensive mode of production and relate only marginally to the pastoralist, agro-pastoralist and smallholder mixed systems. Framing the sector by looking at its aggregate impact does not expose the diametrically opposed trends within the sector and their respective implications. Indeed, a large number of peasants, livestock keepers and pastoralists, while pushed by global and national economic policies to intensify their production (rearing cross-breeds and high-yielding breeds in place of local indigenous breeds, feed concentrates, stall-feeding animals in lieu of grazing, etc.), are today making concerted efforts to de-intensify and revert to agro-ecological livestock rearing practices. This means reverting to a diversity of indigenous ecologically-adapted animal breeds, reverting from ‘specialised’ single commodity production systems to diversified multi-functional livestock rearing systems (manure, milk, meat, transportation, etc.), changing feeding regimes from intensive concentrate feeds to local fodder and crop-residues, and selling produce to local rather than distant markets. This is a strategy to respond to climate change (local indigenous breeds are more resilient and adapted, require reduced quantities of fodder and water and care, are more resistant to diseases), to adapt to scarce natural resources, and to be economically resilient and to safeguard against unreliable global trade policies and regimes, that distort prices in national markets. This people’s reality completely contradicts and challenges the modelling projections of intensification and moving-up the value chain as the most effective way to combat climate change, address sustainability and meet food security needs;

5. **The pretence of complementarity and cohabitation of production models and the silence on the predatory nature of the agro-industrial system:** When introducing classifications of different production models within agriculture and livestock, the report portrays them as complementary to each other. The reality is fundamentally different. The benign characterization of the various production models does not expose the predatory nature of the agro-industrial system and the emerging evidence that, in the name of the grand narrative of feeding the planet, “intensification and specialization” are triggering the exit and exodus of millions of peasants, pastoralists and indigenous people from rearing livestock, the disappearance of literally hundreds of breeds (one per month from 2000-2006 as reported by FAO¹), and creating enabling legal conditions for the further grabbing of land and water resources from their legitimate communities.

There is no mention in the report of the often-violent displacement of communities and appropriation of their lands for the industrial livestock and feed industries, and the resultant loss of more sustainable livelihoods. This process often entails gross violations of human rights, bodily injury, illness, and even death, in addition to increased poverty and loss of assets and ways of life. This has been documented in numerous countries. The continued expansion of the agro-industrial complex is therefore undermining smallholders and their capacity to sustain their productive, territorial, social and political functions. It is itself generating the problem it claims to address.

Furthermore, the narrative has completely failed to document the rise of oligopolies and extreme market concentration of inputs and the rapid, continued and unchallenged global consolidation of the industrial livestock complex (in meat, dairy and feed). This reality continues to create enormous buyer power for both meat processors and retailers that drive much of the externalities referenced in the report, such as environmental pollution, biodiversity loss, global health problems, deteriorating worker conditions, animal welfare, among others. In fact, “bargaining power in price formation” is mentioned for the first and only time on page 81 in the conclusion;

6. **Productivist approach and commodification of life:** By promoting a “productivist” approach to agriculture and livestock, the report further promotes the aggressive commodification of life – human body, land, water, seeds and genetic resources, among others-- that characterizes the agro-industrial model. We reject this notion and reaffirm our holistic understanding of our relationship with our ecology and the cultural, social and political dimensions of production and local markets. In this context, food is the expression of values, cultures, social relations and people’s self-determination, and our food systems are the expression of our cultural identities and human dignity, our ownership over our life course, and our sovereignty.

The ‘productivist’ approach of the current draft also creates a blind spot to other roles and functions of livestock in non-industrial farming, including providing identity, social safety nets, status, insurance, and companionship, among others. These functions are not necessarily a ‘by-product’ of rearing animals for food. Often, the opposite is true, like when livestock provides draught power and means of transport. Hundreds of millions of people depend on

¹ <ftp://ftp.fao.org/docrep/fao/010/a1260e/a1260e00.pdf>

livestock to plough and harvest their land, transport food and water and bring their products to markets. In this context, strengthening animal health and welfare – for example by better access to veterinary services – is mutually beneficial;

7. **The report exposes a very simplistic analysis of malnutrition:** The root causes and factors leading to malnutrition in all its forms are many, complex and multidimensional and cannot be separated from their broader social, political and economic determinants. Indeed, the report mentions that “most people are hungry because they cannot afford food, not because there is not enough food in the world”, but leaves this statement completely marginal to its narrative. Indeed, there is no analysis of the drivers of changing dietary patterns and the report exclusively credits demand-side factors like rising incomes and urbanization for the growth in production and consumption of livestock products. This leads the authors to view industrial livestock and its continued expansion as necessary and indeed, inevitable.

Supply side factors are woefully neglected as agents of demand creation and forces shaping the direction of dietary changes. These include the massive marketing of animal-based foods, including fast food, and the enormous advertising budgets of large food corporations; the often close relationships between agribusiness and governments; the policies that speed industrialization of animal agriculture, including subsidies, tax incentives, limited or non-existent regulatory regimes, trade arrangements, public procurement,² and few or no mechanisms to cost the enormous externalities of industrial livestock and feed production, or to recover these costs.

At the same time, the report remains silent on emerging consumer movements (apart from a preference for local foods) that claim their rights to healthy, affordable and accessible food options as well as to transparent information, and to be protected (particularly children) from aggressive marketing of unhealthy food and beverages that promote the increased incidence of diabetes, cardio-vascular diseases, some types of cancer and other diet-related non-communicable diseases;

8. **The myth of protein-demand and the silence on sustainable healthy diets:** The projected demand of animal protein in the global south, forming the basis of the argument of an urgent need to augment production of milk and meat industrially, needs to be questioned. The report unequivocally accepts it as a fixed element of its analysis, with hardly any in depth analysis of the unhealthy and medically inadvisable meat and milk consumption patterns of the global north (as highlighted by many nutrition experts and the WHO, which recently declared processed meat as carcinogenic³). There is also a lack of discussion about the sustainability and the use of natural resources in feeding human-edible grain to livestock, despite the evidence that out of 100 calories fed to livestock, only 17-30 are then available to humans in the form of meat and dairy⁴--making the system highly inefficient and wasteful for food security. Nor is

² UCS 2008. CAFOs Uncovered: The Untold Costs of Confined Animal Feeding Operations. http://www.ucsusa.org/sites/default/files/legacy/assets/documents/food_and_agriculture/cafos-uncovered.pdf

³ http://www.iarc.fr/en/media-centre/pr/2015/pdfs/pr240_E.pdf

⁴ The rest is lost due to metabolism in livestock: <http://www.ciwf.org.uk/media/7208626/feeding-the-planet-building-on-the-milan-charter-summary.pdf>

there an adequate representation about various types of plant-based diets and alternative sources of protein, e.g. mycoprotein. There is indeed a complete neglect of the necessary re-orientation of diets away from the excessive consumption of meat, milk and processed food, rich in salt, sugar and fat, towards healthier, diversified, sustainable and culturally-appropriate diets. These are diets based on higher consumption of fresh produce and diversified sources of proteins. At the same time, the report overlooks the role that offal plays as one of the most valuable parts of animals from a nutrition perspective. In traditional and agro-ecological food systems, the innards are highly valued because of their special nutritional density and value. On the other hand, the industrial food system devalues these innards and drives them out of the human food system, except for where they see a market opportunity (such as exports to China).

II. Specific comments

- **Missing Trends and Drivers:** The overarching comments expressed above have profound consequences on the section on trends and drivers and call for significant structural changes to this section. Without prejudice to such necessary redesign, the CSM would like to advance some specific comments on the current draft that should also be taken into consideration:
 - a) There is no substantive discussion about the crisis faced by pastoralist communities, nor any political analysis of the drivers that negatively affect their livelihoods and production. Indeed, there seems to be no effort to reach-out to pastoral communities and their knowledge to describe and characterize their challenges in their own terms. Similarly, there is no substantive discussion about the interaction between the so-called “intensive system” with the “mixed-use” system of small producers, as articulated in the overarching comments above. At one point in the report, the authors allude to contract farming as a way that mixed-use small producers are integrated and connected to the intensive largescale industrial system. However, they do not address at all the social impacts of contract farming in countries that have utilized this practice in poultry and pigs for decades, such as the United States, and what learnings this could offer to developing countries moving in the same direction⁵;
 - b) The price volatility in world markets for livestock products, as currently observed in dairy products is not discussed (Pages 24-26), despite this being an important scenario in the future. This is especially relevant as it is the most marginalized livestock keeping communities who would benefit when prices increase, if adequate measures to facilitate their access to markets are taken into account. It is also the smaller livestock keepers who are forced to slaughter their cows when dairy prices drop dramatically. However, the issue of price change is only discussed in a context of intensive livestock keeping (Pages 37-39);
 - c) The poor quality of data on pastoralism and pastoralists should be noted (Page 32). Firstly, estimates on the area grazed by domestic herbivores (most of which include both

⁵ See Leonard, C. 2014. Meat Racket: The Secret Takeover of America's Food Business. Accessed at: <http://www.christopherleonard.biz/the-book.html>

pastoralists and commercial ranchers, but with the overwhelming majority of it being pastoralists) range from a) 25% of the continental land⁶ b) 31.5%⁷ and c) 60%⁸ but to which an unquantified portion of the area is assigned to forests in addition to an unclear percentage of mixed systems (crops and pastures, pastured crops or pastured fallow lands), taking into account only data from developing countries.

Regarding the estimate of how many pastoralists there are in the world, the situation is even more dramatic, starting with the fact that there is no agreed definition of pastoralists: What about dispossessed livestock keepers that have been excluded from livestock production and remain as cultural pastoralists? What about extensive livestock keepers? What proportion of one's livelihood coming from extensive livestock should be considered the reference point for designating her/him a pastoralist? Even in EU countries that have actually articulated payments for sustaining pastoralist production and therefore can have accessible data, data is not collected because it is deemed not of interest. There is therefore a dramatic information gap that does not allow proper design of interventions, nor the much needed services to a population that is often rich in assets (e.g. the value of 50 camels in northern Kenya is much higher than the average bank account of an urban dweller in Nairobi), but poor in living standards (i.e. no access to education or healthcare, poor child survival, no access to financial services or information, and poor nutritional status);

- d) Regarding the smallholder mixed farming systems (Page 32-33), it would be good to see further references on the sustainability of their systems as waste recyclers and users of marginal food sources that do not compete with human food (similar to extensive livestock). The lines are quite blurry between extensive livestock systems and smallholder systems where animals represent less than 10 percent of the total farm output in value terms – backyard livestock production takes place in both as a continuum. Considerations of these systems are very important also regarding future change (Page 34) because of the increasing urbanization of the world population;
- e) Similar to the narrative on yields, the report assumes unabated urbanization instead of addressing ways of maintaining robust rural communities. For instance, there is a lack of consideration of how urbanization will affect livestock producers (e.g. the example provided above regarding backyard systems, but also issues related to expanding high quality markets and opportunities for marginalized collectives). A section should also consider the opportunities for rural development associated with livestock production as well as the challenges confronted by displaced livestock keepers due to the disruption of traditional production systems associated with mobility (and the consequent loss of production and traditional ways of life);

⁶ Asner et al 2004. <http://dx.doi.org/10.1146/annurev.energy.29.062403.102142>

⁷ Hoffmann et al (2014) *Op. cit.*

⁸ See table 4, Thornton, P.K., Krusha R.L., Henninger N., Krisjanson P.M., Reid R.S., Atieno F., Odera A.N., Ndegwa T. 2002: Mapping Poverty and Livestock in the Developing World. - International Livestock Research Institute, Nairobi, Kenya, 124 pp. Available at: <http://www.ilri.cgiar.org/InfoServ/Webpub/fulldocs/mappingPLDW/index.htm>

- f) The report remains suspiciously silent on the systemic and systematic policy bias in favour of industrial production and against pastoralists and smallholders. Not only does this take place within developing countries, with continued legislative actions to improve the so-called “enabling environment” for industry, therefore favouring land and water grabs, the exploitation of cheap labour, etc., but it continues to take place within developed countries where the meat industry has all but decimated the population of independent rural farmers.⁹ For instance, the current CAP proposals of limiting subsidies to larger farms runs contrary to the much-needed support for small-scale food producers in the EU, and counters any agro-ecological approach of small-scale producers. It means that resources are provided to industrial agriculture to the detriment of those in greatest need. This penalises small-scale cheese-makers, honey producers, etc., who form much of the local food system's diversity across the EU;
 - g) As referenced in the overarching comments, trends and drivers should clearly illustrate the major consolidation that is taking place in the sector with as few as 10 companies driving the entire global meat value chain, with as few as 7 companies driving the global grain trade. Many of these companies are also doubling as financial traders of derivatives and contribute to price volatility (something the authors gloss over) with detrimental effects to livelihoods of small producers. Somehow, the power of the industrial complex to drive down prices and create market demand is completely absent from the report even though the industry plays a central role in deciding the future of the livestock sector given its access to politicians in the major meat producing and consuming countries;
- **Challenges to achieving sustainable agricultural development that helps meet food and nutrition objectives:** These sections are wholly inadequate in presenting the actual social, economic, environmental and health and animal welfare challenges that industrial livestock production has brought to our communities (both for producers and consumers). Nor do these sections address the unique problems that pastoral or agro-pastoral systems face in relation to the industry and other economic development schemes. For instance:
- a) In the section on social sustainability, much is said about “missing data” of social impacts, but there is much documentation by trade unions and those working with migrant communities about working conditions in the meat industry, the lack of bargaining power of small producers, and the transformation of small and independent livestock production under the pressure of “economies of scale”. Furthermore, the analysis on gender and equity is extremely weak and requires a much deeper articulation (reading, reviewing and extensively citing Flintan (2008)¹⁰ and WISP-IUCN (2013)¹¹ could be beneficial);

⁹ IATP 2000. The Price We Pay for Corporate Hogs. Accessed at: <http://iatp.org/documents/the-price-we-pay-for-corporate-hogs>

¹⁰ Flintan F (2008). Women's empowerment in pastoral societies. International Union for Conservation of Nature-WISP, Nairobi. https://cmsdata.iucn.org/downloads/gender_format.pdf

¹¹ WISP-IUCN (2013). Women pastoralists' empowerment: Supporting positive change. Briefing note. International Union for Conservation of Nature-WISP, Nairobi.

- b) Economic sustainability is simplified into a discussion about efficiency, trade liberalization and technology, including biotechnology, without actually addressing massive market failures of the livestock industry. For instance, only two European breeders dominate the world market in egg production and only four European and American breeding companies dominate the breeding of broiler chickens. A similar analysis can be done of the pharmaceutical industry in providing medicines and vaccines to the livestock sector;
- c) The report remains silent on the need for stabilized feed grain prices to curtail increasingly unsustainable and destructive market volatility for both crops and livestock caused by climate change, diversion of cropland to biofuels, deregulated financial speculation in agricultural commodity markets and rising demand for meat in emerging market countries. Preventing feed grain prices from falling below the actual cost of production avoids an indirect subsidy to industrial livestock production, which in turn allows livestock raised as part of more sustainable crop rotations in the countryside to compete fairly with less sustainable industrial meat production. Creating more sustainable crop rotations that include pasture fed livestock, will become increasingly imperative in the face of weather volatility caused by climate change, because farming with diversified crops rotations, including pasture, is more resilient than expanding feed grain monocultures. Consideration should therefore be given to the establishment of regional, national and global strategic grain reserves as one of the most effective policies available to directly stabilize prices;
- d) The section on environmental sustainability features a key issue for pastoralists and extensive livestock keepers. The claim of 14.5% of the total GHG emissions being triggered by livestock is based on higher methane emissions triggered by cellulose metabolism and higher GHG potential of that gas. Pastoralists have protested against this claim, as, even if the raw data may be accurate, the derived policy implication of restricting extensive livestock to combat climate change makes no sense. How can pastoralists be blamed for climate change when this has been happening only during the last two centuries and pastoralism has been practiced since 8000 BC? This is a perfect example of the misguided narrative of aggregating the impact of industrial production with pastoral systems. Along similar lines, it should be clearly stated that the water-related issues (in terms of both high demand and pollution) are exclusive to industrial systems; the case study on pork production in China (Box 5 - Page 36) illustrates very well how traditional systems were designed to avoid these kinds of issues. Lastly, there is no mention at all (Page 55) of the intrinsic capacity of pastoralists for climate change adaptation, despite much evidence of this in a livelihood that makes the most out of climate variability and production heterogeneity;
- e) Regarding Box 8 (Page 59), a fundamental missing constraint is the lack of service provision that allows the endogenous development of pastoralist communities. Education, when provided, is done through boarding schools, driving high dropout rates from communities engaged in pastoralist livelihoods and making it nearly impossible for pastoralists to become mobile doctors, lawyers, teachers, and engineers. Healthcare is not provided

http://cmsdata.iucn.org/downloads/policy_note_women_pastoralists_empowerment_supporting_positive_change_eng.pdf

because it is deemed too expensive. No access to energy means no opportunities to diversify production or process foods at origin, therefore adding value. Financial services are not provided except for new developments with mobile money. However, it remains hardly possible for a pastoralist that may own significant assets but no land (because of the very sustainable communal land tenure systems) to get a loan. Even for pastoralists who have mobile phones, which have caused a revolution by modernizing pastoralist livelihoods, getting network coverage remains extremely challenging. A further ignored point is related to problematic investments. For instance, many investors insist in “improving” pastoralist livestock breeds, while these have been selected for centuries not because of their productivity but because of their resilience. This error has dire and direct consequences for both sustainability and food security.

- f) With respect to environmental sustainability, it must also be noted that, within the conceptual framework, there is no reference to the ecosystem services provided by livestock, on which FAO has produced a comprehensive report¹². A further review by FAO's LEAP Partnership has provided much evidence on the positive impacts of livestock on the environment and on sustainability¹³. In the entire section that starts at page 17, there is no mention of the intrinsic sustainability of extensive livestock production in areas of marginal crop production, as well as the challenges to improve an already very efficient system;
- g) In terms of food-borne and zoonotic diseases, there is no reference of the convenience of processing food within livestock raising countries and related areas. This would significantly limit the spread of zoonosis and increase the commercialization of products from marginalized areas, increasing the added value of the production in origin¹⁴. The report is also factually incorrect about the role that the livestock industry's “intensive” system plays in contributing to antibiotic resistance, nor are the systems in developed countries far from sufficient in dealing with the challenge. The authors should do a proper review of literature, including the Global action plan on antimicrobial resistance recently approved by the World Health Assembly (May 2015).¹⁵ Lastly, the authors completely disregard the role of agrotoxins that are devastating rural communities where genetically modified maize and soy is grown. There is a vast body of evidence from the United States, Brazil, Argentina, Paraguay, among others, that shows the devastating impacts of the chain on public health;
- h) The inclusion of animal welfare in the report is welcome, but the discussion is mostly “instrumental” and therefore not fully representative. Indeed, the very real violence of the

¹² Hoffmann I., From T., Boerma D. (2014). Ecosystem services provided by livestock species and breeds, with special consideration to the contributions of small-scale livestock keepers and pastoralists. FAO Commission on Genetic Resources for Food and Agriculture. Background study paper no. 66. <http://www.fao.org/3/a-at598e.pdf>

¹³ Teillard, F.; Anton, A.; Dumont, B.; Finn, J.; Henry, B.; Maia de Souza, D.; Manzano, P.; Milà i Canals, Ll.; Phelps, C.; Said, M.Y.; Vijn, S.; White, S. (2015) A review of indicators and methods to assess biodiversity: application to livestock production at global scale. Livestock Environmental Assessment and Performance (LEAP) Partnership. FAO, Rome, Italy. <http://www.fao.org/3/a-av151e.pdf>

¹⁴ The CSM is aware that a case study is being prepared on this subject by a group of IUCN experts for the revised version of this LEAP Partnership document: <http://www.fao.org/3/a-av154e.pdf>

¹⁵ <http://www.who.int/mediacentre/factsheets/antibiotic-resistance/en/>; See also: <http://www.who.int/drugresistance/documents/surveillancereport/en/>

industrial livestock sector toward non-human animals, in terms of its dire and unacceptably cruel breeding and living conditions for animals (very often in open violation of existing legal frameworks) is not addressed. In terms of animal welfare, the report should put more emphasis on the synergies achieved in non-industrial farming systems, where placing the animals in the environments in which they have evolved, to which they are adapted and where they can fulfil their physical and psychological needs and natures, will result in the best long term outcomes pertaining productivity, livelihoods, health, resource use and ecosystem functions. Such systems, based on reciprocity, work with and benefit from the animals' natural behaviours instead of going against them, like in industrial livestock farming;

- i) It is highly problematic that “trade” is proposed as a solution to food security for developing countries in meeting their “meat” demand. The world market for meat is extremely thin, perhaps even thinner than rice and it is naïve to assume that a dependence on world trade would deliver the food security needs for animal protein given the experience in the food crisis. The fact is that people can live without meat and dairy and even attain nutrition and food security if prices rose. A much more in-depth discussion should take place about the shift to more plant based diets, and the comparative role that non-animal based protein plays in attaining FSN, as mentioned above.

Furthermore, it should also be highlighted that the increased trade in animal products made possible by the WTO led to devastating consequences for local production in many developing and least developed countries. A good example is the complete destruction of the poultry sector of countries like Ghana, Togo and others, because of dumping practices. Another significant concern regarding these exports is related to consumer safety. In many West African countries, a secure or closed cool storage chain for imported meat cuts cannot be guaranteed, leading to severe health risks for consumers. Due to missing cold storage chains, poultry has been traditionally marketed alive to reduce health risks. This sustainable practice is increasingly sidelined. Furthermore, the cheap price of imported meat cuts has negative effects on traditional livestock keepers as their products are replaced by imported meat. Similar dynamics can be reported within the dairy sector.

III. Conclusions regarding Pathways, Responses and Recommendations

The significant concerns articulated in this CSM feedback demand a fundamental shift in the overall narrative of the report and its conceptual framework. The eight overarching comments provide guidance on how to possibly proceed with the new draft:

- i. Firmly ground the report in the context of the CFS and its GSF, with particular reference to the Right to Adequate Food and Nutrition and the broader human rights framework;
- ii. Provide an appropriate presentation of Food Sovereignty and Agro-ecology as alternative political visions and conceptualizations of ways of life, production and socio-economic relations;

- It is self-evident that pathways, responses and recommendations that emerge from a misconstrued narrative and conceptual framework would require a complete redesign of the report. We therefore refrain from commenting further on the relevant sections at this stage. As CSM, we remain available to provide additional support to the HLPE Task Team in redirecting the report towards its intended objectives.

In addition to the references directly included in the comments, we would like to offer an initial list of additional references. This list is clearly limited, given the limited time available, and additional references will be provided in future submissions.

- Report of the International Forum for Agroecology, Nyéléni Center, Sélingué, Mali, 24-27 February 2015, including the Declaration of Nyéléni 2015
<http://www.foodsovereignty.org/forum-agroecology-nyeleni-2015/>
- International Assessment of Agricultural Knowledge, Science and Technology for Development, Agriculture at a Crossroads: Synthesis Report, 2009
http://apps.unep.org/publications/pmtdocuments/-Agriculture%20at%20a%20crossroads%20-%20Synthesis%20report-2009Agriculture_at_Crossroads_Synthesis_Report.pdf
<http://www.unep.org/dewa/Default.aspx?tabid=105853>

- Report submitted by the Special Rapporteur on the right to food, Olivier De Schutter, UN General Assembly, A/HRC/16/49, 17 december 2010
<http://www2.ohchr.org/english/issues/food/docs/A-HRC-16-49.pdf>
- Jan Douwe van der Ploeg, *The New Peasantries, Struggles for Autonomy and Sustainability in an Era of Empire and Globalisation*, Abingdom/New York 2008.

Livestock and Environment/Sustainability, including Climate Change and Community Impacts

- Bajzelj, Bojana, et al., "Importance of food-demand management for climate mitigation", 31 August 2014 <http://www.nature.com/nclimate/journal/v4/n10/full/nclimate2353.html>
- Federal Ministry of Food and Agriculture, Germany (2015) Pathways to a Socially Accepted Livestock Husbandry in Germany. (English version)
http://www.bmel.de/SharedDocs/Downloads/EN/Ministry/ScientificAdvisoryBoard-Pathways.pdf?__blob=publicationFile

In German:

Wissenschaftlicher Beirat Agrarpolitik beim BMEL (2015): Wege zu einer gesellschaftlich akzeptierten Nutztierhaltung. Kurzfassung des Gutachtens. Berlin
http://www.bmel.de/SharedDocs/Downloads/Ministerium/Beiraete/Agrarpolitik/GutachtenNutztierhaltung-Kurzfassung.pdf?__blob=publicationFile

- UNEP, Assessing the Environmental Impacts of Consumption and Production: Priority Products and Materials, 2010.
http://www.unep.org/resourcepanel/Portals/24102/PDFs/PriorityProductsAndMaterials_Report.pdf
- Pew Charitable Trusts and Johns Hopkins Bloomberg School of Public Health, Putting Meat on the Table: Industrial Farm Animal Production in America. A Report of the Pew Commission on Industrial Farm Animal Production, 2008.
<http://www.ncifap.org/images/pcifapfin.pdf> - full report
<http://www.ncifap.org/images/pcifapsmry.pdf> - summary
- Pew Commission on Industrial Farm Animal Production, Recent Changes in Food Animal Production and Impacts on Animal Waste Management, 2008
http://www.ncifap.org/images/PCIFAP_FW_FINAL1.pdf
- Pew Commission on Industrial Farm Animal Production, Environmental Impact of Industrial Farm Animal Production, 2008
http://www.ncifap.org/images/212-4_envimpact_tc_final.pdf
- Pew Commission on Industrial Farm Animal Production, Community and Social Impacts of Concentrated Animal Feeding Operations
http://www.ncifap.org/images/212-4_EnvImpact_tc_Final.pdf

- Herrero M, Thornton PK, Notenbaert AM, Wood S, Msangi S, Freeman HA, Bossio D, Dixon J, Peters M, van de Steeg J, Lynam J, Parthasarathy Rao P, Macmillan S, Gerard B, McDermott J, Seré C, Rosegrant M., 'Smart investments in sustainable food production: revisiting mixed crop-livestock systems', *Science*, 2010 Feb 12;327(5967):822-5.
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