Norsk Bonde- og Småbrukarlag

13.1.2023

Nordic Nutrition Recommendations (NNR) - public consultation

Input from Norwegian Farmers and Smallholders Union (NBS) on the background paper:

Overview of food consumption and environmental sustainability – considerations in the Nordic and Baltic region.

General comments:

It is fundamentally very positive that sustainability for the first time will be considered in dietary guidelines. Dietary guidelines will have consequences for public procurement, meals in institutions such as kindergartens, and also in the curriculum in schools. Norwegian Farmer's and Smallholder's Union (NBS) therefore finds it deeply concerning that sustainability in the NNR process is narrowed down to mainly "environmental sustainability" and that food security is completely neglected. NBS is of the opinion that FAO's definition of sustainable food systems must be a founding principle when giving recommendations on sustainable diets:

> *"**A sustainable food system** (SFS) is a food system that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations are not compromised. This means that:*
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> *– It is profitable throughout (economic sustainability);*
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> *– It has broad-based benefits for society (social sustainability); and*
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> *– It has a positive or neutral impact on the natural environment (environmental sustainability)."*

A commonly used definition of **food security** is that *"Food security exists when all people, at all times, have physical and economic access to sufficient, safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life"* (World Food Summit, 1996).

Another founding principle for sustainable food systems is **food sovereignty**. *"Food sovereignty is the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems. It puts the aspirations and needs of those who produce, distribute and consume food at the heart of food systems and policies rather than the demands of markets and corporations."* (Declaration of Nyéléni, the first global forum on food sovereignty, Mali, 2007*).*

NBS welcomes sustainable dietary guidelines if they are based on FAO's definition of sustainability and the principles of food security and food sovereignty. This means that the dietary recommendations must be based on the land resources in the individual country and not contribute to increased imports.

Detailed comments:

The methodology

In the chapter environmental sustainability is assessed through the methodology of life-cycle assessments (LCA) and planetary boundaries for five environmental parameters: greenhouse gas emissions, cropland use, freshwater use, N application and P application. LCA and the concept of "planetary boundaries" is not an exact science and require a lot of choices to be taken regarding system limits. Regardless of that, the methodology is not capable of considering values like food sovereignty, food security, self-sufficiency, emergency preparedness, traditional knowledge, vital local communities and good lives for people and animals. These are fundamental qualitative values of well-functioning food systems that are not possible to quantify in any meaningful way in a life-cycle assessment. As the paper recognizes, it is also very challenging to address biodiversity in an LCA, and thus, biodiversity is not quantified in the analysis.

The authors state (line 518-522) that "Despite the varying approaches to assessing the environmental sustainability of current and future dietary patterns, the common conclusion is that environmental impacts generally decline as the amounts of animal products in the diet also decline – with vegan diets having the smallest environmental impacts, and diets highest in products from ruminant animals (cows, sheep and goats) having the largest environmental impacts."

With an LCA-planetary boundaries methodology there is no doubt that this can be the conclusion. But to ensure food security, this is not a viable strategy. Every country has a duty to ensure the food supply for their population through the best possible use of its land resources. This means that a rich country as Norway cannot replace its own production of basic food with imports from countries that need the food themself, or by outbidding poorer countries on the international commodity market. To ensure food security in the world, we must accept a certain amount of biological greenhouse gas emissions.

The "planetary boundaries" methodology means that food groups is the starting point for the analysis, and that it does not consider the intricate and complex natural system that food systems are situated in. The starting point should rather be the available agricultural land resources and outfields in each of the Nordic countries. Then, considering the natural constraints of what crops is possible to produce where and assuming environmentally friendly production methods and local nutrient cycles, the production potential of different food groups could be calculated and then translated to recommendations on what we should eat more or less of. This will for all the countries imply a certain level of ruminants.

The ecological value of grazing domestic ruminants

The authors pay very little attention to the value of grazing domestic animals in the ecosystem and seem to assume that biodiversity always is greater outside the farmland. This is for example expressed on page 72, line 2002 to 2005: "A broader point is that current agricultural land use in Norway could usefully be examined to identify 'best' uses for maximises environmental sustainability outcomes. For example, ceasing grazing of farmed animals would allow the boreal forest to regenerate, and wildlife to be reinstated (and predator- prey relationships), providing benefits in terms of climate change mitigation and biodiversity."

The environmental effects of grazing on carbon binding in soil and biodiversity in grazing landscapes is, as stated in the report, difficult to measure. However, that should not lead to this being neglected.

Positive contributions from domestic ruminants that should be considered is their ability to utilize grass areas not suitable for growing crops for direct human consumption, their contribution to good soil structure

through grazing, their provision of manure as a renewable input factor for plant production and their contribution to biological diversity. In Norway, 29 % of the red list species are dependent on grazing and mowing.

Self-sufficiency

Knowing that the environmental dimension is the main premise when integrating sustainability in the dietary guidelines, it is deeply concerning to read statements such as:

- "Generally a focus on a self-sufficiency goal is not considered ideal from a sustainability perspective as trade potentially allows production to be located in areas that are least environmentally sensitive or where environmental impact of products are lower due to well-suited growing conditions." (Line 993 to 995)
- "While some countries (e.g., Finland and Norway) place an importance on self-sufficiency within their food strategy in the event of being isolated from international trade – this goal will not in any meaningful way lead to environmental sustainability. Some areas are better suited to producing certain foods i.e. they are have greater natural comparative advantage (soils, climate, water availability) and/or are less environmentally sensitive. Hence, whether imports or local production are preferred should be primarily determined by environmental impacts if environmental sustainability is prioritized". (Line 1899 to 1905)

There are several reasons for considering self-sufficiency, which stretch far beyond the fear of being isolated. An important factor is competition between exports from rich countries and local producers in the local markets in poor countries. Norwegian self-sufficiency is important for solidarity with international small-holder farmers, to support the food systems and food security in poor countries and to ensure climate adaptation. Social and economic dimensions of sustainability are highly interlinked with the environmental dimensions of ensuring healthy and sustainable food for the Norwegian population. The link between local food and sustainability must be emphasized in the nutrition recommendations.

The value chains and the market

In the article there is strikingly little emphasis on the value chain between the farmer and the consumer. We understand that suggesting policies for value-chains that supports a more diverse production of plant-food in Norway is outside the scope of the paper, but it is nevertheless absolutely essential to increase the Norwegian production of plant-foods for human consumption.

On parts of the total of 3% agricultural land in Norway, the production of fruit, berries, vegetables and grains for human consumption can be greatly increased. The paper states (line 905-907) that "Generally, there is significant potential to increase fruit and vegetable production across the Nordic region – including some production on land that is not currently considered suitable".

It is not correct that it is the **land** that is not considered suitable. The challenge is **access to the market**. In the production of fruit, berries, vegetables and potatoes there is no right for all farmers to deliver their produce to a wholesaler, as it is in the meat, milk and grain sectors. Instead the production is governed by contracts between farmers and wholesalers. As a consequence, these contracts become highly governing for the structure and geography of the production of fruit, berries, vegetables and potatoes. To keep costs down and to compete against imports, there has been a huge centralization of wholesaler and packaging facilities. Smaller producers will mostly not get contracts, especially when located far from these facilities.

In the description of Norway the authors state that "Maintaining current incomes from livestock production is considered the priority issue, which demonstrates some of the socio-political challenges in terms of reducing the environmental impacts of food production and consumption within the region. It will therefore be important to address such issues in order to progress toward more environmentally sustainable agriculture, for example by identifying alternative or replacement income sources." (line 1994-1999)

This again illustrates that the authors fail to recognize that the main challenge for increased plant food-production is not the agricultural subsidies, but the value chain and the competition with imports.

Public procurement as a barrier

At the request from the parties in the agricultural negotiations in Norway, NIBIO delivered the report "More Norwegian fruit and vegetables in public sector" in march 2022. According to the report, the share of fruit and vegetables that are produced in Norway, is 20 % in public procurements, compared to 40 % in general. NIBIO states that "Normally, there will be imported products that have lower prices than Norwegian products. Price pressure, for example as a result of strict budget restrictions, will therefore be an obstacle to a high Norwegian share." It is not possible to demand Norwegian produce in public tenders, as it according to the EEA regulations is not permitted to discriminate on the basis of origin.

This illustrates how there is no direct link between dietary change in a country, and the primary production in the country. Unless strong political measures are taken regarding the value chains, import restrictions and public procurement, the result of a general advice of eating more plant-based foods will be an increase in imports.

What the land can produce

The principles of food security and food sovereignty means that all countries must use their agricultural land and outfields in the best possible manner to produce food to the population.

An increased production of plant-foods is mostly not in conflict with animal farming in Norway. The potential for increased production of legumes is mostly as rotational crops in grain production in the best climatic areas of Norway. Due to their need for a long growing season, legumes will not ripen in large areas of the country (Abrahamsen et. al.: Possibilities for increased protein production on the grain areas – NIBIO bok 5(1) 2018).

In Norway, 45% of the land area is suitable for open field grazing, but less than half of this potential is utilized today - at the same time as the import of feed ingredients for livestock is large. It is not sustainable to lay hold of large areas of land in the global south to produce more vegetables and legumes to feed the Norwegian population. Nor with livestock production dependent on imported feed ingredients. NBS' political views on food security implies that agricultural production in Norway to a larger extent than today must be based on local land resources and local nutrient cycles. This will in Norway mean a diet largely based on milk and milk products, meat, offal and broth from grazing ruminants and pork and poultry based on feed not suitable for human consumption, wild-caught fish, root vegetables and grains – especially does the consumption of barley need to increase.