**Response and Suggestions from Environmental Defense Fund on the**

**HLPE consultation on the VO Draft for e-consultation: “Reducing inequalities for food security and nutrition”**

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Environmental Defense Fund (EDF) is appreciative of this opportunity to provide a response to the VO Draft for e-consultation. EDF recognizes the importance of the HLPE reports in driving ongoing research and policy advancements. As such, we have prepared comments below that acknowledge strengths of the current draft, as well as areas that can be expanded or deepened. We believe that the forthcoming HLPE report has the opportunity to elevate these critical topics and increase support for addressing food and nutrition insecurity in an equitable and comprehensive way. We hope that our suggestions will be of value.

EDF looks forward to the development of the following forthcoming sections:

* **Chapter 7 on prioritized recommendations**
  + The inclusion of a strong list of recommendations within this HLPE report will push this current draft into an operational domain. We highly encourage the HLPE report to highlight best practices and linkages to existing resources and frameworks throughout this section.
  + We strongly appreciate that the current HLPE draft does have emphasis on climate change and nutrition. As the HLPE works towards finalizing the recommendations section, we would like to reiterate comments from our prior submission related to four key priority recommendations: connecting climate change to food and nutrition policy; centering the need for *nutrition* security; elevating the value of aquatic foods; and the importance of data-limited impact assessments. We hope that these points also are centered in this final chapter.
    - There is an important opportunity with this report to draw an explicit connection between climate change and inequity in food and nutrition security. We believe a priority recommendation in chapter 7 should be the need to create climate-informed food and nutrition policies and interventions because climate change is worsening existing inequities in food and nutrition insecurity while at the same time our food systems are a major driver of climate change. It is thus critical that these issues be addressed in tandem.
    - Second, we strongly suggest that the focus should be on *nutrition* security, not just food security, and an important priority recommendation to flow from this report should be a drive to re-value our food resources based on their nutritional content, rather than on traditional economic factors. Doing so will incentivize the production of highly nutritious foods, as well as the channeling of these foods to the groups and people who need them most. This is in contrast to the current value system, which drives the most nutritious food resources away from the most vulnerable groups and into the hands of the wealthiest people while simultaneously incentivizing the overproduction of unsustainable and under-nutritious foods, which are then consumed in high quantities by the world’s poor because they are the most affordable and available foods.
    - Third, we were pleased to see that the report draft contains a short section on fisheries, but we urge the authors to elevate this dialogue into the priority recommendations as well. Aquatic resources, which are a critical and climate-friendly source of both protein and micronutrients for billions of people, have been chronically overlooked by entities seeking to address food and nutrition security, and the result has been detrimental to both the sustainability of our aquatic food systems and the achievement of our global food and nutrition security goals. The sustainable production of aquatic foods, and the improved affordability and accessibility of these resources, should be key goals of funders, policy makers, and development organizations.
    - Finally, we believe a fourth priority recommendation for this report should be a call to action for further focus on accounting for small-scale, data-limited food systems and not just large scale. Otherwise, policies may continue to focus on and favor only the large-scale food systems. For example, food resources that are foraged, gathered, or gleaned by individuals who are not members of the formal food production sector will not be considered or valued in policy or management decision-making, and will therefore not benefit from any efforts to protect or restore those resources. To this end, new information streams such as the [Illuminating Hidden Harvests](https://www.worldfishcenter.org/project/illuminating-hidden-harvests) data on unassessed fisheries would be appropriate to reference as an example for this recommendation.
* **Sections in Chapter 4 on the political economy and fragility and conflict**
  + EDF applauds the inclusion of this forthcoming section. Narrative on the implications of politics and conflict on our fragile food systems are needed. Further, a call to action for researchers, practitioners, governments, and the public, to engage in the development of strategies towards bolstering our food systems against such shocks is opportune.
* **Forthcoming report on “Revitalizing climate policies for food security and nutrition”**
  + EDF is encouraged by the creation of a dedicated report connecting climate policies with food security and nutrition. That said, we do want to reiterate how integral climate change is in relation to issues of equity, equality, and food and nutrition security. As mentioned at length in our prior submitted comments, we believe that there is scope within this current report to further strengthen that argument.

In addition to these suggestions for forthcoming sections, we provide one important comment on the text already presented in this draft:

**Genetically Modified Organisms and the connection to colonial approaches (pages 48, 88-89)**

*“Indigenous peoples have long been concerned that colonial approaches to land for growing food rooted in agribusiness and industrial agriculture characterised by large-scale farming and the adoption of scientific-technological systems such as the use of Genetically Modified Organisms (GMOs) disregards their rights to self-determination and spiritual, cultural and physical relationships to ancestral lands (Bernstein 2013; Collier 2008; Pimbert 2009).” (pg. 48)*

EDF encourages the forthcoming HLPE report to consider a more nuanced approach to the connection of GMOs to the colonization of agriculture (Sahai, 2004, Pal et al., 2007). Linking GMOs ubiquitously with a negative stigma, rather than constructively critiquing the policies that surrounded their debut, limits adaptation strategies (including climate change adaptation strategies) and impacts our ability to support small-holder farmers. See below example:

* Pest resistant transgenic crops developed with the insertion of Bacillus thuringiensis (Bt) such Bt Brinjal, or eggplant, received public opposition across Bangladesh, India, and the Philippines as a result of anti-GMO criticism. This led to smear campaigns in Bangladesh, it was placed under a moratorium in India, and Bt Brinjal field trials were vandalized out of protest in the Philippines (Shelton, 2021). At the same time, the introduction of BT Brinjal in Northern Bangladesh has shown to significantly reduced harmful pesticide use which has decreased farmer input cost, decreased pest related food loss plus increased available nutritious products for sale, and resulted in improved health outcomes due to reduced exposure to noxious chemicals (Shelton et al., 2020; Shelton, 2021; Ahmed et al., 2019; Ahmed et al., 2021; Haque et al., 2020). The Bangladeshi Minister of Agriculture Begum Matia Chowdhury has noted her support for the genetically modified Bt Bringal as a tool to support in feeding the nation’s 160 million people and protecting the environment (Shelton, 2021).

EDF therefore suggests that the narrative within the HLPE report should examine and critique existing governance and intellectual property rights, which are undeniably connected to colonial practices, rather than targeting GMOs directly and explicitly – it should be made clear that GMOs should be treated carefully and the governance that regulates them should be modified according to the needs and perspectives of impacted farmers, and especially of historically marginalized food system actors, but that GMOs can have a place within adaptation strategies and can support small-holders.

**Citations:**

Ahmed, A. U., Hoddinott, J., Abedin, N., & Hossain, N. (2021). The Impacts of GM Foods: Results from a Randomized Controlled Trial of Bt Eggplant in Bangladesh. American Journal of Agricultural Economics, 103(4), 1186–1206. [link](https://onlinelibrary.wiley.com/doi/10.1111/ajae.12162)

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