



**Schola  
Campesina**  
Sharing knowledge  
for food sovereignty

Gallese, 08/11/2019

**Object: Comments on the proposal of an International Digital Council for Food and Agriculture**

**What are the potential entry points for government to address challenges and foster the development of digital agriculture?**

*Digital agriculture is still in the hands of few and in this moment is intensifying the polarisation in rural areas between poor and rich farmers, leading the latter to be extremely dependent on technology. Governments, actually, have no control over this process. Digital innovations are introduced by the private sector, without comprehensive impact assessments or regulatory frameworks by governments. This undermines government control over processes in the food and agriculture sector that impact the right to food for all.*

*Governments should support: 1) digital-agriculture programmes as farmer/community led process for the well-being of family farming. In Agroecology (Nyeleny 2015) there are examples of that. 2) Impact assessment of the on-going digitalization innovations 3) technological sovereignty initiatives 4) Regulatory frameworks that prevent any privatisation of data. 5) Precautionary principle applied in all policy recommendations on the implementation of digital agriculture. 6) policies and practices of the CSO's lead initiatives on digital agriculture*

**How can the establishment of the Digital Council address the numerous barriers to adoption of these technologies?**

*The mandate of the Digital Council is unclear and itself cannot be the tool to address this challenge. The total lack of any kind of regulation enforced on digital agriculture cannot be addressed by a generic forum, with participation of stakeholders like mega ICT companies that have a clear conflict of interest, and are entering for the first time ever in the food sector.*

**Do you think that the roles identified for the Digital Council are suitable for facing the agrifood systems challenges outlined above?**

*Policy and regulatory frameworks for digitalisation are the main priority: An immediate moratoria should be called to avoid concentration of data in the hands of a few companies, as is already happening. There is a clear underestimation of the impact of digitalisation on the food systems all around the world on the Right to Food. A Digital Council that has no regulatory power cannot address these risks and impacts. The next FAO Regional Conferences in 2020 (as already started in ERC 2018) should address the need for regulatory frameworks for digital agriculture and all FAO COAG should include these discussions in their agendas. Finally, the CFS in the ongoing work on the policy recommendation on Innovations, should define an overarching policy and regulatory framework.*

*Until comprehensive regulatory frameworks are in place, a moratorium on any concentration of all kind of agricultural data in the hands of private companies should be put in place on the basis of*

*the precautionary principle.*

**What governance structure should be in place in order for the Council to serve its purpose?**

*The Council should work under the Guidance of the CFS and respect the fundamental mandate and principles of the CFS.*

**Please add any other comment or relevant content you think should be included in the Concept Note.**

*The seed sector has already shown how DSI is hindering farmers rights and creating more and excessive concentration in the seed sector, which is having a devastating impact on agricultural biodiversity.*

*Data are collected by farmers and the farmer's data ownership is still not at all defined and regulated, but a few companies are already collecting and storing immense quantities of data. This has to be stopped immediately.*

*Trade: Agricultural data collected by the farmers are not trade commodities. The WTO cannot claim any role in setting regulatory frameworks. Farmers rights and the right to adequate food and the recently approved UNDROP are the appropriate references to be used by governments.*

*Until now, no serious impact assessments on digital agriculture have been conducted. There is no clarity on the impacts of digitalisation on food and agriculture, and in particular, on the collecting and concentration of data which risks the extreme concentration of power in the food sector. There is also no impact assessment on the entry of the new actors - ICT companies - on the food sector . This has to be cautiously considered to assess the economic, ecological, and social impact.*