



**NIBIO**  
NORSK INSTITUTT FOR  
BIOØKONOMI

## NOTAT

### Forfattere:

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Dato: 23.03.2023

## Høringsuttalelse til Helsedirektoratet vedrørende nye nordiske ernæringsanbefalinger (NNR) - kommentarer til «paper 3».

I regi av NNR 2022 er det utarbeidet en vitenskapelig rapport, benevnt som paper 3: Background paper: Social and economic dimensions of food sustainability.

NIBIO har avgitt høringsuttalelse til nevnte rapport, oversendt Helsedirektoratet den 23. mars (lastet opp [her](#)). Høringsuttalelsen er skrevet på engelsk, og gjengitt i sin helhet i dette notatet.

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### **Høringsuttalelse på paper 3, (NNR 2022) fra NIBIO**

Authors at NIBIO: Audun Korsæth, Arne Bardalen and Per Stålnacke

#### **General comments**

##### **1. Lack of novelty**

In the current draft the authors attempt to address the health effects of foods as well as the sustainability challenges associated with dietary change. A substantial part (almost 50%) of the report comprises a summary of the SAPEA report. What is new, is an outline of a few selected social and economic dimensions of sustainability (i.e. inequalities of access and affordability, questions of cultural appropriateness and power asymmetries within existing food systems). In our opinion, this outline, comprising a relatively brief review covering only a small fraction of the social and economic sustainability issues related to the food domain, does not provide sufficient new



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insight to the research community in order to consider the current draft as a potential, scientific paper.

## **2. Misleading title**

The title gives reason to expect a thorough analyses comprising all the most important aspects related to both social and economic dimensions of food sustainability. The draft focuses, however, on sustainability challenges associated with dietary change, i.e. focusing on the consumers, whereas sustainability issues related to food production is hardly addressed. We find that this narrow consumer-focus makes the paper irrelevant.

## **3. Reflections regarding the twin goals of health and sustainability**

A prerequisite for a meaningful assessment of sustainability in any field, not only related to food production or consumption, is that all dimensions of sustainability need to be addressed. The authors particularly underscore the importance of this approach when policymakers are attempting to address twin goals of health and sustainability as in the NNR, not least “*since difficult choices between competing policy options will occur*” (Conclusion, p.13). In this context, we would like to express our concern that the prerequisite of addressing all dimensions of sustainability related to food production and consumption are not met in the NNR2022-project - a fact that is well within the scope of the project funded by NNR, as the project was never aimed at addressing more than the environmental dimension. The incomplete sustainability assessments of Nordic food production in the NNR2022-project therefore make the attempt to address the twin goals in the final report meaningless.