



NOTAT

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Høringsuttalelse til Helsedirektoratet vedrørende nye nordiske ernæringsanbefalinger (NNR) - kommentarer til «paper 4».

I regi av NNR 2022 er det utarbeidet en vitenskapelig rapport, benevnt som paper 4: Background paper: Challenges and opportunities when incorporating sustainability into food-based dietary guidelines in the Nordics.

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.

Høringsuttalelse på paper 4, (NNR 2022) fra NIBIO

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

Unclear role of the paper in the overall approach

It is unclear how the current paper fits in among the four other background papers that “*will assist the NNR2022 Committee when developing the NNR report*”. To our knowledge, the Nordic Minister Council approved the funding of the NNR-project in June 2018, based on a project application with the following main objectives: 1) update NNR for energy, macro- and micronutrients, 2) develop evidence-based platform for national FBDG, 3) develop evidence-based platform for integration of **environmental sustainability** into FBDG. The project leader of the



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NNR-project has repeatedly confirmed publicly that the sustainability part of the work is focused on the environmental dimension, underlining that it will be up to the national health authorities to consider economic and social dimensions when/if integrating the advice from the NNR report into national recommendations. In the current paper, however, both environmental impact and some **sociocultural** aspects are considered. The unclarity is not improved by the fact that the last of the five papers is aimed at addressing **social and economic dimensions** of food sustainability.

General comments

1. Confusing aim / misleading title

The aim of the present paper, “*to discuss challenges and possibilities for adaptations to healthy and sustainable food consumption and production in the Nordic countries*”, is confusing. The term “sustainable food consumption and production” sounds as if sustainability is covered in full width, but the paper focus more narrowly on FAO/WHO's guiding principles on environmental impact (#9 - #13) and sociocultural aspects (#14 - #16) of foods (i.e. not including all relevant social impacts, and leaving the entire economical dimension untouched). To be able to address the aim of the current paper, one would first need the answer to the following two questions set in a Nordic context: 1) what is sustainable food production, and 2) what is sustainable food consumption? Unfortunately, we have neither. The papers developed so far in the NNR-project do certainly not provide this information.

Next step would be to address the actual method needed to incorporate this information into the diet related recommendations and advice. To do so, it would be necessary to establish a system for how to weigh the various factors governing sustainability, along with their numerous trade-offs, and additionally accounting for the health value of the food items. This step, which is left completely unaddressed in the current draft, is in our opinion the most crucial one when attempting to incorporate sustainability into food-based dietary guidelines. It is also the most challenging step, which involves almost impossible choices between competing objectives.

2. Poorly explained method

The method used in the current paper appears to be a combination of review of country specific statistics, research on local aspects of the Nordic food systems, and governmental actions and initiatives, performed by the author core group, and a following expert elicitation with a larger author team, focusing on inputs on challenges and opportunities. It is not described how the expert elicitation was performed.

3. Lack of novelty

The current draft appears to be more like a report, and not a fundament for a scientific paper. This is mainly due to the lack of novelty. The paper hardly provides any new insight, knowledge or ideas



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on how the Nordic food systems, either separately or seen together, may improve in terms of enhances sustainability.

4. **Incomplete text**

The authors have deliberately left open spaces for filling in (!) A public joint venture to complete what is aimed to become a scientific paper, is as such not very scientific, and we question the reason for doing so. Is this due to lack of competence among the authors and their selected “*Nordic scientists and experts*”, or is it due to time limitations? The text appears incomplete also in many sections without open spaces, seen for example partly when addressing challenges and opportunities for the various principles, and not least when it comes to food security (see 5.)

5. **Severe shortcomings when addressing food security**

In the summary it is stated that “*The most important underlying concern of the paper is food security, and associated issues of resilience and self-sufficiency*”. The draft, however, does not justify such a statement. Food security is in the draft related to principle #15 (*Are accessible and desirable*). In the result section, the topic covers about half a page (p. 27) for the Nordic countries seen together, of which most of it is covered by a table showing how each of the Nordic countries scores on the Global Food Security Index. Any discussion on what this index is based upon, or it’s suitability for the Nordic countries is missing. (The country-wise description of challenges and opportunities is also missing for Denmark and Norway). The discussion chapter appears to have a superficial and unstructured approach when addressing food security, presenting a somewhat arbitrary mixture of challenges and opportunities. The food system is not properly defined, and fish appears to be forgotten. Moreover, any thorough discussion on the relations between food security, self-sufficiency, and degree of self-sufficiency is absent.

6. **Unclear conclusion**

It is difficult to identify any conclusion in the draft, but a statement in the summary show that meat consumption is considered an important issue: “*The current consumption of meat, in particular red meat, is too high when evaluated in a health and sustainability perspective and is to a considerable degree based on import of meat and of animal feed.*” Firstly, the paper does not address health issues, and there is nothing in the draft which may justify the claim that current consumption of meat in the Nordics is unhealthy. Secondly, the draft does not perform any analyses of sustainability in its full width (see 1.). Thirdly, the current consumption of meat is not *to a considerable degree* based on import of meat; the self-sufficiency is high for meat, at least in Norway.

In the summary it is also stated that “*The number of livestock is also higher than needed for utilization of local resources.*” This statement does not reflect any findings or discussions in the text, nor is it correct. In Norway for example, 45% of the land area is classified as good or very good



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grazing quality, whereas only a modest share is utilized by the current grazing livestock population.

The perhaps most interesting discussion in the draft related to meat is, however, not mentioned in the summary. This relates to the considerations, that significantly reduced domestic meat and dairy consumption might lead to reduced utilization of local resources, both grass- and grain-based, and that the actual products might be in increasing demand globally in the future. The Nordic countries appear to have many relative advantages in livestock production, and in a global and long-term perspective, it may be very sustainable, in the full width of the term sustainable, to preserve our local resources for food production – our current agricultural land, production infrastructure including genetic resources, and motivated and well-educated farmers.