

The Nordic Council and the Nordic Council of Ministers  
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Dear Nordic Council of Ministers,

We the Danish Agriculture & Food Council, Norwegian Farmers' Union, Norwegian Rural Youth, The Norwegian Society of Rural Women, The Federation of Swedish Farmers, Swedish Meat, Farmers Association of Iceland and The Central Union of Agricultural Producers and Forest Owners (MTK) hereby turn to you in order to express our concerns regarding the ongoing work of the Nordic Nutrition Recommendations Committee (NNR2022).

We have previously questioned the categoric reference to climate impact as proxy for environmental impact, and how the Nordic Nutrition Recommendations (NNR) risk being dictated by climate targets, rather than targets connected to nutrition and health. First, targets regarding nutrition and health should be evaluated, then, other sustainability considerations should be considered. In evaluating sustainability, all aspects of sustainability must be included, not only environmental sustainability. Also, economic and social sustainability must be considered, together with the environmental and climatic sustainability concerns.

**We have now reached a point where we consider us obliged to draw your attention to the grave omissions of the NNR work. We consider there to be a lack of good scientific methodology and transparency. It is challenging for external key stakeholders to stay informed and take part – on a solid scientific basis – in the work that will eventually affect both public health and the society at large in the Nordic countries, and especially the impact on farming and food production.**

#### **Biased scientific approach**

Firstly, we have concerns regarding the composition of the working group. There appears to be no official collaboration with experts, nor research institutions with competence and insight to sustainable food production in the Nordic countries. Instead, a British think tank, Chatham House (represented by Helen Harwatt and Tim Benton), has been given the task to evaluate sustainability. This has happened without a tender process, and there is no public information regarding how this decision was made. We find it troublesome that a British institute, described as a think-tank, and which may be regarded as an ideological institution, is the main responsible for creating a scientific foundation for a governmental process, instead of collaborating with agricultural institutes based in the Nordic countries who have worked with sustainable food production for decades. Both Helen Harwatt and Tim Benton argue in favour of a radical shift in the food system, and are proponents of extreme reduction in food produced from livestock. A radical change in the food system and dietary recommendations will have vast consequences for food security, self-sufficiency, use of local resources, biodiversity, economy and employment in the Nordic countries. A robust, objective, and scientific foundation should not be conducted by organizations or experts with strong ideological convictions.

#### **Weak methodology**

Further, there appears to be a difference in standards regarding the systematic reviews (SR) and chapters related to nutrition and health, compared to the background papers on sustainability. There is

no description of an explicit and reproducible method, nor of criteria for selecting relevant literature and studies. According to the requirements described by the committee, the committee members are not to be authors for the SRs and chapters. Nevertheless, representatives from the NNR committee are involved in the background papers on sustainability.

During the ongoing process of the NNR, despite disclaims, we have witnessed how drafts repeatedly anticipates the sustainability chapters by referring to an environmentally sustainable diet as a diet with low or no animal sourced foods, without any consideration taken regarding production methods or prerequisites for local food production. This strikes us as anachronistic, since a sustainable diet is yet to be defined by the NNR, taking local and regional prerequisites for food production as well as population-based nutrition and health needs, availability, and food culture, into account.

In addition, there are many studies highlighting the positive effects of animal production to both nutrition, health and sustainability that could have been included (Bergez, et al. 2022, Geiker, et al. 2021, Han, et al. 2019, Johnston, et al. 2019, Leroy, et al. 2022, Lescinsky, et al. 2022, Mayer, 2022, Sandell & Tunón, 2021, Schäfer et al. 2021, Vassilopoulou, 2022, Vernooij, et al 2019, Zagmutt, et al, 2020, Zeraathkar, et al 2019).

#### **Lack of information on consultation process**

The background papers about environmental sustainability are announced for public consultations. However, there is lack of information on the consultation process available (e.g., who will consider the consultation inputs, how will they make sure that the inputs are evaluated and taken into consideration). Thus, there appears to be no independent control mechanism in place to ensure that the comments will be fully considered. Indeed, we are very grateful for the opportunity to take part in the NNR process by attending to hearings and submitting feedback on chapter drafts. However, hitherto, we have still no knowledge of any positive comments on animal sourced foods having been incorporated into the ongoing work, despite an impressive amount of both criticism to previous work and suggested scientific research.

#### **Bias against livestock**

The first background paper published on sustainability (Benton, et al. 2022) omits the positive effects that livestock production has on biodiversity. Sheep, goats and cattle are ruminants that eat grass and herbs. When these livestock groups are allowed to graze freely on inland pastures and in open fields, they create an open plain landscape with habitats for thousands of species. Hence, grazing animals play an important role in maintaining the biological diversity and ecological functionality of pastures. The paper also fails to bring the positive effects that livestock production has on sequestering carbon in the soil (carbon sequestration), into the discussion. It is worrying that the authors did not make any effort to give a more balanced overview, which signals a clear bias against livestock.

In addition, positive effects of innovation in food production are not addressed. Innovation in the food sector is one of the most potent and prioritized mechanisms towards a climate neutral/sustainable food production in the future. The current knowledge on climate and environment is shortly outdated, as innovation is moving fast.

#### **Fails to acknowledge food security**

The paper also fails to acknowledge aspects related to food security and its importance, even though food security is an integral part of sustainable food production.

There are great regional differences between the Nordic countries in terms of resources, climate, seasons and availability of light. The Nordic countries have limited possibility for a fundamental shift in the food production system. The impression of the committee appears to be that areas used for animal production may be easily used for plant-based food production. This is a fundamental misunderstanding

of the Nordic food system, as animals, and particularly ruminants, are key players in transforming food resources not suitable for human consumption, into highly nutritious foods. A drastic reduction in animal production would not only have deteriorating effects on regional agriculture, it would also reduce self-sufficiency and food security. In addition, it would result in increased import rates and potentially increase the pressure on global food prices. Considering a demand for increased food production globally, it appears ignorant to implement dietary recommendations in the Nordic countries that could result in decreased food production. The Nordic region is among the least climate vulnerable in the world. A reduction of national production of food can result in increased dependency on production in countries in higher risk zones in terms of climate change.

### **Reductionistic and unnuanced view on nutrition and health**

We are of the opinion that many of the chapters in the hearing process so far show a reductionistic view on nutrition and health. There is a risk of shaping food based dietary guidelines that does not match the latest and well-established data pointing to the health benefits of some foods “despite” their content of certain nutrients previously regarded as unhealthy. For example, dairy products high in fat, such as cheese and whole fat yoghurt, are examples of foods that contain larger amounts of saturated fatty acids, but still show tremendous health benefits when part of a balanced, varied, and nutritious diet.

The same argument is valid for meat, which contains protein and iron of high quality that can be challenging to replace from other sources. Often, the increased relative health risk related to meat consumption is used as an argument to decrease the intake of these foods. However, as is the case in the first sustainability background paper, there is no discussion on the difference between relative and absolute risk in relation to the health benefits of meat consumption within the present food based dietary guidelines.

In addition, there is a continuous reference to the EAT Lancet Planetary Health Diet throughout the paper, with no reference to all the studies scrutinizing and criticizing the report.

Furthermore, data on population intakes of certain nutrients are missing with no note to why.

In the dietary aspect, the working groups also fail to mention recent and convincing research emphasizing how vulnerable groups in the population, such as children and adolescents, women of fertile ages, as well as elderly and frail, are particularly in need of nutrient dense foods with a high bioavailability, found almost exclusively in animal foods. Moreover, the authors do not refer to food matrix science, which takes a holistic approach to nutrition and diet. Rather, they keep to the reductionistic view where foods are reduced to a single or a few or isolated nutrients to argue what foods are healthy and which ones are not.

### **Threatening the credibility of NNR**

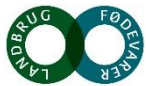
Until now, there has been support of and a high trust in the scientific methodology and quality of the NNR-project in the Nordic countries. Public meal providers are dependent on NNR and the national food based dietary guidelines. Across the national farmer associations in the Nordics, there is a high adherence and trust to the guidelines. This is reflected in all relevant communication, both to the public and other stakeholders. However, now this trust is at stake. We are gravely concerned about the unacceptable process, unbalanced composition of experts, flawed methodology and lack of transparency shown by the NNR-committee.

In the Nordic countries, farmers have for years, and will continuously strive to produce sustainable foods of all kinds. In the Nordics, livestock is a prerequisite for sustainable food production and a high degree of self-sufficiency, using the natural resources that are available.

We strongly encourage a good practice template for the working groups to follow as they proceed with their work. It is of utmost importance to recognize that there is no global, sustainable diet that works on a local and regional level for all target groups in all various populations. This is something that needs to be stated and taken into consideration in all work from the NNR project, and onwards. Not only the sustainability background papers and the upcoming draft to the sustainability chapter.

**Based on these concerns, we respectfully urge you, the Nordic Council of Ministers, to reach out to the NNR committee in order to disclose and discuss the whole body of criticism, aiming to correct and improve the process, method, and transparency, not only as they go forward, but also scrutinize the previous work and publications presented by the working groups.**

Yours sincerely,



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