

## General comments

Thank you very much for giving us the opportunities to give our views on the public consultation draft Nordic Nutrition Recommendations 2023 - Integrating environmental aspects.

Norwegian Farmers' Union expect that the mandate from the Nordic Council of Ministers to the NRR committee will be presented in the main report. In connection with the five background reviews on sustainability issues, all three aspects of sustainability (social, economic, environmental) were to be assessed. But in the main report, only a few selected environmental factors have been considered. This has been messy, and we believe it must be made clear which order the Nordic Council of Ministers has given to assess the dietary advice against the sustainability goals. We believe that the main report does not provide grounds for claiming that the dietary guidelines have been assessed against the sustainability goals.

The report is inconsistent in that negative environmental impacts that are applied to the food group "red meat" and "milk and dairy products" are not applied to the food group "vegetables, fruits and berries". In the assessment of environmental effects for red meat and milk, the report points out that imported fodder ingredients and land use has a negative impact on these groups while imports and land use do not have a negative impact on the assessment of vegetables. This is important since Norway imports around 80% of our consumption of vegetables, fruits, and berries today and this proportion will increase if we are going to substitute parts of animal protein with plant-based protein. It is also unclear how all the negative effects from meat and dairy production is weighted compared to positive effects and the negative effects from plant production, like use of water.

This also applies to use of fertilizers and pesticides which have been highlighted as a concern linked to meat and milk production. Pesticide and fertilizer use linked to other food groups such as pulses, nuts and vegetables is not discussed, nor is the climate impact linked to feed for fish farming. We also disagree that livestock manure and mineral fertilizers constitute a major environmental problem in livestock production. Manure is a resource that increases the soil's nutrient content and reduces the need for fertilizers. Without manure from livestock the natural biological circle for plant production would also be broken and plant production would totally depend on chemical fertilizers. It is also unclear how all the negative effects from meat and dairy production are weighted compared to positive effects and the negative effects from plant production, like use of water.

The report emphasizes global emission figures in areas such as greenhouse gas emissions, water consumption, use of pesticides, fertilizers and use of other countries' agricultural land in the assessment of the recommended consumption of red meat. This is very misleading when there is national data that shows that the Norwegian emissions and environmental impacts are significantly lower than the global figures.

The recommended decrease in the consumption of red meat without increased consumption of white meat will lead to increased food waste from grain production. Domestic animals have a unique characteristic in that they can utilize resources that we humans cannot. The UN calculates that 86 percent of what livestock eat is not suitable for human consumption. For cattle, it is calculated that for every kilogram of proteins from milk and red meat, only 600 grams of edible protein are included in the feed. In Norway, only a limited proportion of the grain crops achieve food quality every year. This proportion varies from year to year. If you cannot feed the livestock with the grain that does not achieve food quality, this will have to be discarded and become food waste. The Norwegian Farmers' Union fully support the initiatives to grow more fruits and vegetables in Norway. But even though there is some potential of producing more fruits and vegetables in grass- and grain areas, there are limits to this transformation, as shown by Agri Analyse in report 1-2022 (Meir norske proteinvekstar til fôr og mat?). Variable quality for human food indicates that the change to more plant based consumption in Norway would lead to lower self-sufficiency. It would also give a more concentrated

production, since animal production is the most prominent production in more marginal areas. It also has to be taken into consideration consumer preferences, so farmers are not guided to produce less animal products while consumers continue preferring these products. In that case the only change would be more imports, while the government has a goal of higher self-sufficiency.

In the assessment of red meat, the report ignores the fact that the choice of production method has great potential to reduce climate and environmental impact. Instead of recommending food that is produced using environmentally friendly and sustainable production methods, the report recommends reducing the intake of red meat. We believe that the report places too much responsibility for a reduced environmental and climate footprint on the consumer and their change in dietary habits and takes too little account of the initiatives and measures taken by the farmers. Large resources are put into Norwegian agriculture to reduce greenhouse gas emissions. One example is methane inhibitors in the feed to reduce methane emissions from ruminants, which can provide significant climate reduction in the future. The sum of climate measures from food producers may be one of the most important inputs to a more sustainable food system in the future.

### **Specific comments**

The Norwegian Farmers Union is critical about the recommendation to reduce the intake of red meat to a maximum of 350 grams per person per week. This is significantly less than the recommendations from the UN's Food and Agriculture Organization report "Contribution of terrestrial animal source food to healthy diets for improved nutrition and health outcomes", which was published on 25/04/2023, has regarding red meat:

*"Synthesized findings from risk analysis show that consumption of modest amounts of unprocessed red meat (ranging from 9 to 71 g/day) has minimal health risk. For processed red meat, however, very low levels of consumption can elevate the risk of mortality and chronic disease outcomes, including cardiovascular disease and colorectal cancer."*

The UN report is an assessment of the downstream impacts of terrestrial animal source food on healthy diets for improved nutrition and health. We believe that the food group "red meat" must be divided in two. One recommendation for unprocessed red meat and one recommendation for processed red meat. It is processed red meat that is scientifically proven to be associated with a risk of disease. Unprocessed red meat should receive a separate recommendation independent of processed red meat. This principle is also used for unsalted nuts and peanuts.

The Norwegian Farmers Union is critical to the fact that venison now is included in the "red meat" group. By defining game meat as red meat, the recommended intake of other red meat is reduced. Game meat has no negative climate and environmental effects and there is no research evidence to reduce the intake of game meat based on health assessments.

Some consumers may choose veganism, or a pescatarian diet, but meat, eggs and milk, offer crucial sources of much-needed nutrients which cannot easily be obtained from plant-based foods. This is stated in the UN's Food and Agriculture Organization report "Contribution of terrestrial animal source food to healthy diets for improved nutrition and health outcomes". Throughout the NNR-report, there is evidence that the diets with lower environmental impacts are not achieving recommended intake of a broad range of nutrients. Women seem more vulnerable to the dietary changes than men in terms of nutrient adequacy. The solution being suggested is supplementation and/or fortification. This is a bizarre recommendation, as one would have assumed that the primary responsibility of dietary guidelines is to recommend a diet that meets nutrient needs, not one that is dependent on supplements and fortified processed foods. If the recommended diet was based on nutrient-dense whole foods, supplements would not be necessary.

The Norwegian Farmers' Organisation is very concerned that the proposal to reduce the intake of red meat to a maximum of 350 grams per week will reduce Norway's self-sufficiency. We are very concerned that the NNR-report completely overlooks food security, even though FAO's definition for food system sustainability underlines that sustainability is about food security:

"A sustainable food system is one that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations are not compromised".

It has been estimated that the global population will increase up to approximately 10 billion by 2050. At the same time climate change has been predicted to reduce production of food and raw materials in several regions of the world. The UN urges the world nations to employ the national resources for food production. The responsibility of every country to use their resources for food production will increase in the years to come. The paper, however, does not acknowledge this, and instead proposes changes in the diet that will lead to more dependency on imports. In large parts of the Nordic countries, a substantial amount of the agricultural areas is the best suited for feed crops. With such a narrow understanding of sustainability, the NNR recommendations are insufficient as advice for the national recommendations.