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**The Norwegian Society of Rural Women's input to the  
NNR2022 project's public consultation on sustainability in diets**  
In reference to the work on new, sustainable dietary guidelines for the Nordic and Baltic countries.

**General comments**

The Norwegian Society of Rural Women (NSRW, Norges Bygdekvinnelag) is a member based NGO. Our field of expertise is within the nexus of sustainable food production, traditional food culture and food traditions in Norway, an expertise that has granted us status as an advisory organization to UNESCO within intangible cultural heritage.

The NSRW wants to commend the aim of integrating sustainability in our new dietary guidelines. The combination of health and sustainability represents a new and necessary way of approaching diets.

We have two main general comments to the draft paper. Firstly, the NSRW acknowledges that environmental sustainability, i.e. sustainable use of the natural resources upon which our food system is based, is an essential foundation for long term production and a sustainable, global food security for all, which is the premise of healthy diets overall. We would, however, like to point out that «sustainability» is a three-pillar matrix where all the pillars are inherently intertwined. The social, economic and environmental elements of sustainability are all interconnected parts in the global-local good system. Having a system-based approach, it is key to understand how all the three, equally important, elements correlate and interact with each other.

The draft paper *Assessing the environmental sustainability of diets (...)* does, as the name indicate, focus fairly exclusively on the environmental dimension of sustainability. We are concerned that focusing on just one dimension of sustainability runs the risk of being blind sighted by how the other dimensions are inherently interconnected within the sustainability complex. Seeing the forest for the trees, as it were, makes us vulnerable to coming to unbalanced, counterproductive or even wrong conclusions. We therefore question the value of the draft paper in informing new dietary guidelines, as it seems to us that the work have to begin with looking at all three dimensions of sustainability «from the start». They are not possible to dissect and scrutinize separately due to their interconnected nature and the non-linearity of the global food system. For instance, the economic sustainability within the value chain, the profitability for farmers to produce for local vs. global markets, the social and economic value of local production and thriving local communities, as well as the intangible values of knowledge sharing and skills development in terms of traditional food

practices and local food culture to support healthy diets, must all be seen in relation to environmental sustainability, and the multitude of trade-offs between all of these factors must be considered holistically.

Secondly, we uphold that when starting the work on developing new, sustainable dietary guidelines specific to the Nordic and Baltic countries, the local and geographical perspective should be crucial. It is made clear that the scope of this paper is the global viewpoint, and that more local oriented papers will follow, but we question this top-down approach and how a general and global perspective that is not sensitive to the unique context of these countries, may be applicable in the work to follow. As many leading institutions now recognize, there is no such thing as a «sustainable global diet», and no one size fits all, but rather many ways of achieving sustainable diets within the local context of each country and region. Granted, there may be general frameworks or principles for sustainability that might be applicable to all countries, but our concern is that starting with taking the top-down approach might blur some of the very real differences that exist both between the Nordic/Baltic countries and the rest of the world, but also within the countries. It is of the utmost importance that the new dietary guidelines manage to account for the unique geographical context in which they are to be used, including the social and economic aspects.

### **Detailed comments**

It is our firm belief that true sustainability starts with the local context. In order for food systems to be sustainable, one has to take into account that all countries are unique and have their own climatic, topographic, geographic, cultural and economic circumstances. For example, sustainable food production in Norway, who has around 2,7% arable land under cultivation, where much of the land is above the arctic circle and where 95 % of the total land area is rangeland (where about half of it is good for grazing), will look very differently from Denmark, where 66% is arable land and the climate is warmer. Likewise, global environmental concerns such as water use in food production might not be applicable for Norway, where we seldom have problems with freshwater shortage. Also within countries the differences can be stark. For instance, the western and northern parts of Norway have wetter climate, much less arable land and much more grass- and mountainland compared to eastern Norway. These areas are much more purposeful for meat and milk production from grazing animals, while the eastern parts are more suitable for grain production due to their warmer climate and larger proportions of soil. These are differences that must be accounted for within a sustainable food system framework.

It is our view that a food production that is truly sustainable must be based on the local and natural resources at a given place. A guiding principle of a sustainable global-local food system must be that as much food as possible is produced locally (on local resources) and consumed as locally as possible, minimizing the need for transportation and external inputs. This principle is not only the most environmentally friendly, but also, generally, superior in terms of animal welfare, social equality, nutrition and economic sustainability for the farmers. Through a local approach, we can affect global sustainability. The best way to achieve food security and sustainable, healthy diets is when all countries take the responsibility of producing as much food as they can on their own land resources for their own people. Highest possible national self-sufficiency is global solidarity and environmental sustainability in practise. The new guidelines must encourage and support each country's potential to housekeep and sustainably manage their bit of the world's common resources.

Also, as safeguarders of traditional food knowledge and cultural heritage, we see how the food that was historically available to people due to geographic, topographic and climatic differences, has shaped local food traditions and culture. The knowledge of local traditions are crucial to preserve as

a part of the social sustainability dimension. Minimizing food waste by utilising all the resources is also a key element in traditional food culture.

Food that is local and traditional usually have in common that it is made out of fresh ingredients. In terms of health and nutrients, arguably the single most important factor is to eat whole, fresh food and avoid ultra-processed food. More and more evidence shows that the great influx of industrialised, ultra-processed food on the market has had a huge negative impact on the rate of chronic and lifestyle diseases such as cancer and coronary diseases, which are the primary causes of mortality in western countries.

The dietary guidelines of Brazil shows an excellent example here, and should be inspirational for our own guidelines. They focus on avoiding ultra-processed foods, making natural or minimally processed foods the basis of the diet, and to use oils, fats, sugar and salt in moderation. They also communicate the importance of the social aspects of food, and recommend eating in appropriate environments, preferably in company, and also develop and share cooking skills. This is in our view admirable. If one also manages to include the local and traditional aspect, we should have a very good framework for new, sustainable guidelines.