

CSM Comments on the CFS Version 2 of Zero Draft of the Voluntary Guidelines on Gender Equality and Women's and Girls' Empowerment in the Context of Food Security and Nutrition
8 July 2021

General Comments

First, we would like to warmly **thank the Chair**, Satu Lassila, for her leadership and guidance through this process, and Françoise Trine as focal point of the CFS Secretariat for the work done. We wish the Chair well in her future endeavours.

The CSM Women's Working Group currently gathers 190 participants from a wide array of constituencies and sub-regions. We wish to reiterate our collective expectation towards this process: we want to deliver a **ground-breaking** CFS policy document on Gender Equality and Women's and Girls' Empowerment. This is an extraordinary opportunity in extraordinary times, which requires an unlimited ambition. If not now, then when? We hope this intention is shared by all members and participants in this process.

From a CFS perspective the document is undoubtedly advanced in some regards, but in general it is perceived by CSM constituencies working on the ground as not sufficiently ambitious, lacking coherence among its different sections and not yet fully capturing the policy demands needed for real transformation on the ground.

The overarching comments with respect to Version 2 of the Zero Draft are outlined below.

- We appreciate the strengthening of **human rights** throughout the document, but we still believe a strong human rights grounding is crucial in Part 1 and 2 of the document. We welcome the inclusion of FPIC and CEDAW in the text; Nevertheless, we also want to see clear references to GR 34 of CEDAW, the Beijing Declaration and Platform for Action, UNDROP, UNDRIP, and the Security Council Resolution 1325 in terms of the connection between food security, peace and women's political participation in conflict resolution mechanisms.
- We believe the Zero Draft still has a **strong productivist approach** which does not put into discussion, nor qualify the current dominant mode of agricultural production. The document should clearly state that current food systems are unsustainable and the food produced within them is not healthy. There is no recognition that women are looking for alternatives to the dominant model because they are exploited by neoliberal policies in general and particularly in the context of agriculture. Agroecological approaches, that have proved to be sustainable, equitable and healthy, are not mentioned enough, while they provide pathways that not only ensure healthy and sustainable diets, but also address structural causes of inequalities, particularly from a gender perspective.
- There is a consistent **focus on "cultural contexts and norms"** as responsible for gender injustices, but there is no mention of the responsibilities of the current neoliberal, colonial and patriarchal economic model. The document seems to suggest that the achievement of gender equality, women and girls' empowerment and rights are linked to women's integration in the current dominant food production and consumption model, rather than linked to a radical transformation of food systems and the subsequent tackling of power imbalances and inequalities.
- The Zero Draft has a strong **gender binary approach** narrowing the sexual orientation and gender identities only to men and women, without naming and making visible LGBTI persons, which are indeed also contributing to our food security and nutrition as small-scale food

producers and are often subject to multiple forms of discrimination in the current food systems. We can provide OHCHR evidence in this sense (e.g., <https://www.ohchr.org/EN/Issues/LGBTI/Pages/UNResolutions.aspx>)

- The Zero Draft does not address a **transformative paradigm** and the crucial role women and LGBTIQ persons' have within this transformation, as the draft currently focuses on women as actors who are functional to agricultural value chains, often portraying rural women as victims and not agents of change, resistance, and resilience. Hunger is not linked to women's efficiency as food producers but to structural causes of gender inequalities. Women produce the majority of the food in the world, and the change they foster on a daily basis is not aimed at simply achieving equality in an unequal economical, ecological, political and cultural way of production but to achieve a systemic change. The draft fails to present the way in which women, girls, LGBTI persons and Indigenous peoples are bearers of alternatives, knowledge, and solutions to tackle the intersecting crisis we are facing globally.
- We welcome **the inclusion of COVID-19** impacts within the problem statements as well as the **climate crisis**.

Comments and suggestions for the process ahead

Regional consultations: The regional consultations must be inclusive and based on the framework and modalities of the CFS, respecting its different mechanisms and guaranteeing the participation of the groups most affected by food insecurity and malnutrition but most contributing to food security and nutrition worldwide. It is key that the CSM is involved from the very beginning (preparation of the consultations) and that civil society participation is organised autonomously through and according to the principles of the CSM and the reformed CFS. The CSM suggests that a clear methodology for the consultations is elaborated as well as guiding questions that can be followed across regions.

CFS 49th Plenary Session (October 2021): We believe that the upcoming CFS Plenary Session could be of great use to start debating around some of the most divergent and key topics of the GEWE Guidelines. CSM proposed during the Advisory Group and Bureau meeting of April 2021 to make use for this purpose of the CFS Secretariat's special session, currently scheduled on the last day of the Plenary, 14 of October, at the eve of the international day of rural women. This session will not be included in the Final Report but could offer a moment of exchange making use of the most participatory and inclusive space of the Committee, its Plenary Session. The TTT could also be tasked to design a proposal of format and methodology.

Part 2 - Core Principles that underpin the Guidelines

We welcome this part of the Zero Draft, as we believe it sets a good tone and the right framing for the Guidelines. We appreciate the improvements of some of the core principles. From Version 1. These include the inclusion of key concepts such as inclusivity, diversity, participation, public policies and services. However, we have outlined our recommendations on how to further strengthen the core principles.

- We request the deletion of the principle of 'multi-stakeholder collaboration and partnership' (para 26) as we strongly believe it is **not a principle, but possibly a means**. In this sense we are surprised to note that it has been strengthened in this version. If it is not agreeable to delete this principle, we would request to include conflict of interest's measures for the development and implementation of the Guidelines.
- We continue to request the addition of a new principle on the **Recognition and Inclusion of LGBTI persons**. The Guidelines should acknowledge the importance of embracing LGBTI persons in its scope, in order to stand against the physical, psychological and structural

discriminations they face in rural and urban realities. The Guidelines should promote non-discriminatory policies on sexual orientation and gender identity, so that no one is left behind. It is key that LGBTI people can enjoy freedom over their bodies, feelings and sexual preferences, in order to fulfil their role in food systems and as pre-condition to overcome hunger and malnutrition.

- The principle of 'Commitment to Human Rights and Realization of the Right to Adequate Food' (para 17) needs to include reference to additional international declarations and conventions, as outlined in the general comments above.
- We want to see gender transformative approaches that tackle patriarchal structures, which are responsible for the causes of gender inequalities, as to achieve lasting change. This requires engaging **men and boys** to strengthen their joint responsibility and play an active role for the successful transformation of unequal power relations and discriminatory social systems, institutions and structures.

Part 3 - The Voluntary Guidelines on Gender Equality and Women's and Girl's Empowerment in the context of Food Security and Nutrition

Overall, we appreciate the section on gender-based violence (GBV) has been moved higher up in this section, as it is a framing element to tackle the scope and objectives of these Guidelines. Nevertheless, we would propose a slightly different structure as outlined below:

- 3.1 Women's participation, voice and leadership in policy- and decision-making at all levels;
- 3.2 Linkages between food security and nutrition and violence and discrimination against women
- 3.8 Recognition, reduction and redistribution of unpaid care and domestic work;
- 3.5 Women's economic empowerment across food systems;
- 3.6 Access to and control over natural resources, including land
 - 3.6.1 Agricultural inputs, advisory services and other productive resources
 - 3.6.2. Access to financial services and social capital
- 3.10 Social protection and food and nutrition assistance
- 3.3 Access to education, capacity building, training, knowledge and information;
- 3.7 Access to labour markets and decent work;
- 3.9 Women and men's ability to make strategic choices over their own and their family's nutrition
- 3.4 Access to appropriate technologies, including ICT-based, digital and agri-innovations;

We have outlined our response to each section of part 3 below.

3.1 Women's participation, voice and leadership in policy- and decision-making at all levels;

- We appreciate the general improvement. However, paragraph 30's framing on the issue on the decision-making power at household level is problematic as it reinforces the narrative on care work being only a responsibility of women. The framing should align itself with the section on redistribution of care work.

3.2 Linkages between food security and nutrition and violence and discrimination against women

- We welcome the strengthening of this section, both in the problem statement and policy areas, nevertheless we regret to see that the title has changed by removing "elimination" and substituting it with the "linkages" and thus watering down the framing of this crucial section. We request the inclusion of elimination of GBV and discrimination against women.
- We also request the distinction between different types of GBV faced by women and girls, such as state violence, domestic violence and violence in context of crisis. The structural barriers under these different contexts are different and need to be highlighted. Moreover,

we would like to mention violence against women human rights defenders and nature defenders. It is also important to include sexual violence, especially in the case of wars and conflicts.

- We appreciate the inclusion of protracted crisis contexts, however, based on the intensity of hunger and malnutrition suffered by women and children under conflict, a separate paragraph on GBV in the context of wars, conflicts and protracted crisis is needed. Further, we request the separation of GBV under disasters including climate crisis from GBV under conflict. We find problematic the reference to women in context of protracted crisis as beneficiaries only in the policy area section.
- LGBTI people should be referenced to in all paragraphs of this section, including the title itself. In 2021, we can no longer ignore violence and discrimination suffered by LGBTI persons, evidence on this is overwhelming. This is a matter of food security and nutrition, if discrimination and violence persist, hunger and malnutrition will never decrease, as food is too often a vehicle to impose power, including within the households themselves.

3.3 Access to education, capacity building, training, knowledge and information;

- We would like to reiterate the importance of women's knowledge, including knowledge of Indigenous peoples, as fundamental to achieving the objectives of this section. Furthermore, women are not only beneficiaries of education, but providers of education also.
- It would be important to reference youth in this section more prominently. More emphasis should be given on how girl's education is crucial to allow them to have power over their own lives and decisions, rather than the focus being on how education enables them to improve household nutrition profiles
- The role of public research needs to be strengthened.

3.4 Access to appropriate technologies, including ICT-based, digital and agri-innovations;

- We welcome the new critical approach and elements included in some parts of the problem statement and policy areas, in particular paragraph 57.
- Despite these efforts, the place given to technologies, including ICT-based and digital innovations, remains problematic. The section puts them at the same level of structural approaches (e.g., social protection) and is placed before the crucial issues related to unpaid care work, economic empowerment, access, and control over natural resources and so on. We are concerned about the space given to approaches that characterize 'Big Tech' companies, where farmers are typically viewed as clients, and there are neither participatory approaches, nor co-design of technologies to meet women's needs and respect their rights.
- In the instances where ICT-based digital and innovations are appropriate, we would also welcome the inclusion of women and girls' only platforms due to the abuse experienced by women and girls on online platforms.

3.5 Women's economic empowerment across food systems;

- It is important to highlight the need to transform current food systems for the valorisation of women's existing and essential roles.
- We still find problematic the framing of value chains, as it narrows the scope of the economic empowerment possible for women and girls across the broader food system. We want the focus to be on food systems and territorial markets, and women adding value, and not just being a cog in the wheel in the value chains. When women's integration to value chains are mentioned, it should be made clear that the priority is local and territorial value adding processes, rather than globalised and industrial ones.
- We question why there is specific reference to climate smart farming (para 60) which lacks any specific criteria, including social or environmental safeguards. Furthermore, it fails to prioritize farmers' voices, knowledge and rights as key to mitigation and adaptation in

response to climate change. Alternatively, we propose greater inclusion of agroecology to enhance economic empowerment and to address the shortcomings of climate smart farming.

- We welcome the reference of CEDAW in this section.
- This section has a strong focus on cultural context, but fails to recognize that today's economic context and financialization of food and agriculture is a strong driver for land grabbing.

3.6 Access to and control over natural resources, including land

- We welcome the recognition of women's knowledge and the inclusion of FPIC, as well as the recognition of their crucial role in fighting climate change and protecting biodiversity. We welcome the inclusion of para 76.
- Women's equal access to land should be a matter of rights and not circumscribed to potential economic gains. This is a very problematic and biased assumption that in order to enjoy their equal rights, women must prove that the society will have quantified economic benefit. Whereas the status quo of men owning productive resources is not questioned or required to provide economic benefit proof.
- Women's land tenure and access is not uncertain, but rather not ensured. There should be reference to the actual barriers to women's land ownership through customary practices and due to operations of land grabbing and related financialization of natural resources.
- The gender binary approach continues in this section. Policy areas for discussion should also include the reference to LGBTI persons, as too often land tenure rights are not guaranteed to them, as well as challenges faced in accessing and controlling productive resources.
- There should be a reference to the importance of communal land for women and girls. Access to communal land must be secured. Individual land titles are not the only solution.
- In the policy areas for discussion, we suggest adding an area to shift the perspective on food production to include food systems and agency (as defined by the HLPE's Global Narrative towards 2030). This would provide strong support for women's role and value in food production systems, including recognition of their traditional knowledge, a valuing of small-scale food producers and family farmers, improving direct access to consumers to the benefit of small food producers and sustainable use of resources.
- We recommend para 77 which references agroecology is strengthened, as per the definition and guiding principles of agroecology, to include the ecological dimension and recognition as a social and political movement.

3.6.1 Agricultural inputs, advisory services and other productive resources

- The inclusion of climate smart agriculture in the policy areas for discussion (para 85) is problematic, as it places this practice at the same level as agroecology. Instead the paragraph should refer to "agroecological and other innovative approaches". Please see comments in 3.5.

3.6.2. Access to financial services and social capital

- In this section we welcome the insertions related to climate change, the financial autonomy of women and the strengthening of the policy areas for discussion.
- We would like to refer to women not only as entrepreneurs but as food producers (para 87)

3.7 Access to labour markets and decent work;

- This section should be strengthened by including reference to eliminating violence and harassment in the workplace with regards to ILO Convention No. 190, as there are only minimal references to exploitation and abuse currently (para 98). However, we strongly recommend retaining para 98 due to the inclusion of migrants, asylum seekers and refugees.

- The focus of this section should not be on empowerment at an individual level, for example connecting women to markets, as this is futile without addressing structural factors that contribute to markets being highly unequal, including the market domination that prevents producers from negotiating prices and conditions, and unfair commercial practices.
- We request that text from Version 1 of the Zero Draft be inserted into the within the current problem statement (Para 94: Women often lack access to social protection benefits and to information and training that would enable them to protect themselves) as it is not a matter of luck (para 95)
- Concerning the policy areas for discussion, we believe is not a matter of reconciling paid and unpaid care work but is about re-distribution, as well as addition of necessary laws and policy measures to prevent and address violence and harassment in the workplace

3.8 Recognition, reduction and redistribution of unpaid care and domestic work;

- We welcome the redistributing demand included in the policy areas for discussion, and believe this should be consistent with section 3.7.
- Further inclusions in the policy areas are collecting and publishing national statistics to make visible unpaid care work; implement a solid social security system; promote and strengthen health benefits; and improve rural and suburban infrastructures

3.9 Women and men's ability to make strategic choices over their own and their family's nutrition

- We welcome the inclusion of the additional section and focus on nutrition, however currently it does not focus on the right to adequate food framework. The section focuses on empowering women for improved nutrition, with an emphasis on family/household nutrition, rather than asserting women as rights holders and that their right to adequate food needs to be ensured).
- The General Comment 12 on the Right to Adequate Food may be useful here in terms of:
 - ensuring access and availability to adequate food,
 - dietary diversity (to contrast the notion of specific nutritional needs, which are narrowly addressed from a biomedical perspective including supplementation, fortification and biofortification
 - and the concept of adequacy itself.
- As the section stands right now, the problem statement does not focus on the root causes of women's malnutrition: lack of access to healthy and diverse diets, including access and control of food at the household level and the socialization of who eats when and what within household, detrimental labor conditions, not guaranteeing sexual and reproductive health and reproductive rights, and lack of policies to support exclusive breastfeeding for the first 6 months
- Public policies need to be redirected towards:
 - Addressing nutrition from a gender perspective to ensure women's health and well-being, rather than a narrow frame of beneficial for their families/households.
 - Ensuring healthy and diverse diets (including within workplaces) through local food production and procurement.
 - Ensuring paid maternity and paternity leave, as well as nursing rooms in public spaces and offices as well as time for nursing/pumping during work hours to enable breastfeeding.
- We believe the title of this section is problematic, and references to men and 'strategic choices' be reviewed, as it currently undermines women's self-determination over their own nutrition and health. One proposal for the title could be: "Access, availability, affordability and sustainability of healthy diets through sustainable food systems for women's nutrition and food security"

3.10 Social protection and food and nutrition assistance

- We welcome the strengthening of the policy areas
- Add paragraph 118bis: “Charity emergency facilities offering housing and food are often divided between female and male genders. Especially transgender people face discrimination to access such facilities, facing tremendous barriers to access their rights, including the access to adequate food and nutrition.”

Part 4 - Implementation and monitoring of the use and application of the voluntary guidelines

- We believe that this fundamental section should not only mention equality and empowerment but also the human rights dimension (para 121)
- The capacity building of implementing and enforcing agencies and bodies should be strongly mentioned and developed in this section.
- Participatory approaches and multi-actor spaces are also crucial for the implementation and monitoring phase. Multi-stakeholder platforms should have strong regulations and safeguards against conflict of interest, in order to address power imbalances affecting the voices and experiences of those most marginalized. It must be made clear that the different actors involved in the process do not have the same responsibilities with regard to the development, implementation, and monitoring of public policies needed for the achievement of gender equality, women and girls’ rights and empowerment. All actors are important, but within the framework of these Guidelines and that of the Committee on World Food Security, the responsibility of States as guarantors of rights as well as citizens as subjects of rights must be placed in a relevant position and be differentiated from what it means to be a mere “stakeholder”;
- Participatory institutional spaces should be safe spaces, free from gender discrimination and sexual harassment.
- Despite the voluntary nature of the Guidelines, each country should come up with their binding guidelines to fit within the limitations mentioned in points 14 and 15 of Section 1.