Comments from the European Commission on

General comments:
The European Commission welcomes the CFS policy process and the first version of the Zero Draft of the CFS Voluntary Guidelines on Gender Equality and Women’s and Girls’ Empowerment in the Context of Food Security and Nutrition. We very much appreciate the intersectionality approach applied in the Guidelines.

There is the need to be clear on the scope of the guidelines which are not GEWGE in agriculture / rural areas but rather ‘in the context of food security and nutrition’. A key question is therefore whether these VGs address all food insecurity and malnutrition - including in urban areas and among those not primarily reliant upon farm related livelihoods? What about beyond food systems where women are just as economical disempowered and food insecure / malnourished? Is the focus on the rural population with a stronger focus on agriculture, is it on food systems, or is it on food security and nutrition? If food security and nutrition as currently stated, then economic empowerment beyond food systems also has significant implications for food security and nutrition. This should be clear from the start and will have significant implications for rebalancing the content.

About 55 percent of the world’s population lives in urban areas, a proportion that is expected to increase to 68 percent by 2050 - especially in Africa and Southeast Asia, where hunger and poverty are currently mostly concentrated. It is important to move beyond thinking of rural and urban areas as a dichotomy, as dissociated things – with urban populations considered as mere food consumers, and rural communities seen exclusively as food producers.

Bearing in mind that a) food insecurity is only one of many causes of malnutrition; b) the causes of food insecurity among those who are net consumers rather than subsistence producers are complex and extend beyond agriculture. Low and irregular incomes are the root cause of urban food insecurity, but inadequate housing and basic infrastructure and limited access to services contribute to levels of malnutrition and food insecurity that are often as high if not higher than in rural areas. It is a challenging question but we would suggest that it is key to these VGs.

With the adoption of the EU Gender Action Plan III, the EU just renewed its ambitious commitment to promoting gender equality and women’s and girls’ empowerment (GEWGE) which directly relates to advancing food security and improved nutrition. Reports on progress are expected in 2023 and 2025 based on objectives and indicators contained in the document “Objectives and Indicators to frame the implementation of the Gender Action Plan III (2021-25), SWD (2020) 284 final”. Many of the GAP III indicators are linked to SDGs and they would therefore be valuable for the discussions here, especially for the points 23 and 95. If these guidelines will also develop a set of indicators to be able to measure progress, it may be useful for all actors to use the same and join forces to get such data (which often are not available at country level).

More emphasis should be put on the crucial importance to build interventions on gender sector analysis which are specific to a country/local context in order to understand from the start the constraints and opportunities. Only then, it is possible to fully ensure gender mainstreaming in any food security and nutrition action.
Part 2:

Para 17: “Achieving gender equality and women’s and girls’ empowerment is fundamental to the realization of human rights, including the right to adequate food.” We suggest the recognition that achieving the realization of human rights, including the right to adequate food is also fundamental to GEWGE, they are mutually reinforcing each other.

Para 20: Strengthening policy coherence: Emphasise the multi-sectoral nature of FSN.

Para 21: Context-specific approaches: It is important to underscore that a context specific analysis must be inclusive, robust, and participatory. (Analysis can actually do harm if not appropriately undertaken.)

Para 23: Reinforcing the collection and use of gender-disaggregated data: Include a reference to girl’s knowledge – also men and boys.

Para 27: Adequate financial, technical and human resources: Highlight the significance of political commitment here as well.

Part 3:

Generally, it is very good to have a problem statement at the beginning of the various paragraphs, but it always brings a rather “negative” perspective and shows women as “victims”. It might be good to label it as both, problem statements and opportunities that clearly show what would be the gain of having true gender equality. For instance for 3.1 Women’s participation, voice and leadership, a number of studies show that having more diverse boards in companies makes them economically more successful, that countries led by women might perform better. This could be included throughout the document.

3.1. Women’s participation, voice and leadership in policy-and decision-making at all levels:

Para 28: Problem statement: “Women’s participation, voice and leadership in policy-and decision-making at all levels” should also refer to the private sector.

Para 34: Does the application of quotas to ensure women’s representation in leadership positions also apply for the private sector?

3.3 Recognition, reduction and redistribution of unpaid care and domestic work: The government’s role and responsibilities vis a vis effectively regulating the private sector (generally a cross-cutting issue) – International Code for Marketing of Breast Milk Substitutes and measures to address aggressive marketing of unhealthy foods, imperative to regulate private sector where women and girls rights violated etc., should be reflected in the document.

Inequality in care economy is a focus of 3.3 (unpaid care and domestic) and then maternity protection, exclusive breastfeeding and complementary feeding is referenced in 3.9 with respect to social protection (SP). Would suggest to have a much more explicit focus in 3.3 recognising ‘first food systems’ as crucial for considerations of FSN and in particular the commercial determinants of maternal, newborn and child health. Indicators such as the minimum acceptable diet (6-23 months) highlight that only a minority of children under 2 have healthy diets. Including reference to the Code of Marketing Breastmilk Substitutes as well as more broadly the significance of Universal Health Care for maternal and child malnutrition (and strengthening national health systems) would also be important in 3.3
Only a small proportion of mothers are unable to breastfeed for physiological or medical reasons, yet many more do not because they are the denied the choice, or lack the support to do so.


It should also be explicitly referenced that to ensure child survival, optimal development and health, the World Health Organization (WHO) recommends infants initiate breastfeeding in the first hour of life, are then exclusively breastfed for 6 months, and thereafter receive nutritious and safe complementary foods, while breastfeeding continues for up to 2 years of age or beyond.

3.5.1 Natural resources, including land, water and forests and 3.5.2 Agricultural inputs, advisory services and other productive resources:

Opportunities to considerably expand on GEWGE and climate change (beyond impact of climate disasters), agroecology (as well neglected / underutilised / indigenous crops) should be reflected in the text, beyond para 69, 70 and 78: Given the enormous significance of the climate change agenda for food security and nutrition, we suggest that the guidelines should be more explicitly comprehensively addressed from a GEWGE perspective. There is a direct relationship between gender equality, women's empowerment and climate change. On the one hand, women are disproportionately vulnerable to the effects of climate change, but on the other hand, women have unique knowledge and skills that can help make the response to climate change more effective and sustainable. Climate change policies that therefore take account of gender-based vulnerability and the unique contribution that women can make could help advance gender equality and women's empowerment while fighting climate change. Women engaging in UNFCCC (as highlighted in the draft text) is important but by no means the only opportunity for women's empowerment to address the climate crisis.

We also suggest to include a more explicit link to agroecology with gender and both climate change mitigation and adaptation. For instance, the shift to neglected / underutilised / indigenous crops can present crucial opportunities for adaptation, resilience and improving food security and nutrition. At the same time it would also be important to acknowledge that while agroecological approaches are key, they are also labour and knowledge intensive, and require addressing power dynamics within and beyond households. A key recommendation would be to integrate principles of gender equality and women's empowerment into all polices and financing for climate change including adaptation and mitigation.

With respect to the reference to agroecology, greater recognition of the opportunities articulating GEWGE and agroecology are suggested.

3.6 “Access to education, capacity building, training, knowledge and information”:

Please add “Technical and Vocational Education and Training” (TVET)

3.8 “Safety, security and elimination of violence and discrimination against women and girls in the context of rural and urban agri-food systems”:

We recommend having gender-based violence (GBV) as an earlier section to give greater prominence and recognise its foundational significance and it would be better recognised in a standalone section (overarching significance of the challenge) rather than combined with the quite distinct issue of GEWGE in contexts of conflict and disaster. Underlying this suggestion is recognition that the majority of GBV takes place outside of conflicts and
disasters (while acknowledging that crises may exacerbate GBV). The GAP III Framework provides an illustration with Section 1 addressing GBV upfront and Section 5 addressing Peace and Security.

3.9 “Social protection and food and nutrition assistance”: We recommend having crisis contexts / humanitarian assistance (including FSN assistance) as a separate section (distinct from Social Protection)

3.9 would benefit from significant revision including:

- Recognising that while contexts can vary significantly the urban poor can be considered as vulnerable as the rural poor to shocks.
- Understanding that as recognised in analysis presented in SOFI 2020, more than 3 billion people in the world cannot afford a healthy diet. Therefore social protection cannot be narrowly understood as responding to shocks, but also as an urgent measure to address chronic poverty, where women are overrepresented.
- There needs to be a stronger focus on strengthening national social protection systems and an approach that understands this policy area as an investment in human development rather than simply as a welfare measure.
- The generalized statement that ‘women and girls are twice as likely to suffer from malnutrition as men and boys’ (para 113) is factually incorrect, requires better and more contextualised data analysis, and points to the need to be clear on which specific forms of malnutrition are being referred to.

General comments for part 3:

The European Commission would like to strengthen the reference to the need of developing and provision of affordable, accessible and person-centred social support and essential services as the main enablers of social inclusion of women and girls. The need of enhanced social and essential services references would be particularly appreciated in relation to points 33, 47, 48 and 53.

Gender responsive budgeting should be included in the guidelines: ‘Gender-responsive budgeting seeks to ensure that the collection and allocation of public resources is carried out in ways that are effective and contribute to advancing gender equality and women’s empowerment.’ (UN Women https://asiapacific.unwomen.org/en/focus-areas/women-poverty-economics/gender-responsive-budgeting)

Gender responsive budgeting is based on the logic that a budget is the most comprehensive statement of a government’s social and economic plans and priorities. In tracking where the money comes from and where it goes, budgets determine how public funds are raised, how they are used and who benefits from them. Therefore, implementing commitments towards gender equality requires intentional measures to incorporate a gender perspective in planning and budgeting frameworks and concrete investment in addressing gender gaps.

Gender responsive budgeting is referenced in GAP III as an area to which EU action should contribute: ‘Supporting universal social protection systems, and recognising, reducing and redistributing unpaid care and domestic work by providing more support for gender-responsive budgeting;’

There is no mention of trade as a key agenda and as also acknowledged in GAP III. Funding through development assistance is not enough: women’s and girls’ rights will not be achieved if policies that structurally hamper their realisation are not changed. New trade agreements should include strong provisions on gender equality, including compliance with relevant ILO and UN Conventions.
The document would benefit from a more balanced approach to recognising all forms of malnutrition and the challenges presented by the triple burden as they relate to GEWGE. It needs to be recognised that overweight and obesity are linked to more deaths worldwide than underweight. At the same time, the poor, being unable to afford healthy diets, can be obese and suffer from micronutrient deficiencies simultaneously. In recent years, there has been a significant acceleration in the incidence of obesity and NCDs in low-income countries with high levels of food insecurity. In the context of sub-Saharan Africa for instance, the rate of overweight and obesity is higher among women than among men and in urban areas compared to rural areas.