

**Preliminary comments from the EU on
“Version 2 of the Zero Draft - CFS Voluntary Guidelines on Gender Equality and
Women’s and Girls’ Empowerment in the Context of Food Security and Nutrition”**

General comments:

The **EU welcomes the second 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 transparent and inclusive policy process and especially the intersectional approach applied in the Guidelines.

A joint position of the EU & its Member States will be developed in due course.

With the adoption of the **EU Gender Action Plan III** end of last year, the EU 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. Many of the GAP III indicators are linked to SDGs and they would therefore be valuable for the further discussions here.

We acknowledge that many of our key points pointed out in our **first contribution** were addressed and efforts have been made to **broaden the Voluntary Guidelines from a narrow agri-food systems focus to a more inclusive food security and nutrition approach**.

At the same time, several issues - **including the urban dimension¹, the nutrition transition², gender budgeting³ and trade still remain unaddressed**.

Furthermore, we believe that 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.

Comments on Part 2:

Paragraph 17: Commitment to Human Rights and Realisation of the Right to Adequate Food: We suggest to add the recognition that achieving the realization of human rights, including the right to adequate food is also fundamental to gender equality and women’s and girls’ empowerment, they are mutually reinforcing each other.

Paragraph 23: Reinforcing the collection and use of gender-disaggregated data: We believe that it is very important that the perspectives of children and young people are included. Children and youth make up 3.2 billion people (42% of the global population) and a reference to girl’s and boys’ should be included.

¹ See Comments by EC for the first version of the Zero Draft.

² In general the profound implications of the ‘nutrition transition’ in terms of the coexistence of undernutrition with overweight and obesity as already poor diets increasingly incorporate ultra-processed foods – including among poor rural communities – are not captured in the document, see last point of this document.

³ See Comments by EC for the first version of the Zero Draft. (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.’)

Comments on Part 3:

We acknowledge that many of our key points regarding the **structure of Section 3** have been addressed - for example by including a new section 3.9 (“Women and men’s ability to make strategic choices over their own and their family’s nutrition”) by addressing nutrition related issues. We welcome that social protection has been strengthened, that the sub-section on gender-based violence has been moved (3.2) more to the beginning of this section in order to highlight its importance and that more focus was put on climate change.

The subsection “Recognition, reduction and redistribution of unpaid care and domestic work” has been moved from 3.3 to 3.8⁴: Because this is such a core structural issue with fundamental implications for all other sub-sections and a transformative approach in general, we believe that it should be addressed earlier. There is a need for strong public policies and regulations if a transformative approach is to be meaningfully leveraged. This should be well reflected here.

3.6 Access to and control over natural resources, including land:

The disproportional impact of climate change has now been addressed in paragraph 68. We also welcome the insertion of the reference to indigenous peoples. Overall, we appreciate that the section now expands considerably around the climate agenda including with respect to women’s unique knowledge and skills and the need for engagement at all levels.

We also suggest to include a more explicit link to **agroecology** with gender and both climate change mitigation and adaptation.⁵ This is only partially addressed in paragraph 77 and agroecology is still referenced only twice in the entire document.

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

We welcome that this new sub-section has been added which introduces the concept of empowerment within the household. However, it is important not to bracket nutrition off as if it were a standalone component when in fact the entire document should be relevant to food security and nutrition. We also suggest that the heading for 3.9 is revised to for ex.: **“Women and men’s ability to make strategic choices for healthy diets and good nutrition”**.

At the same time it should also be made clearer in the text that the ability to make strategic choices cannot be supported by interventions such as raising awareness and providing supplements alone. Rather the structural and social determinants of poor diets and malnutrition need to be addressed, requiring a coherent multi-sectoral approach, including effective regulatory mechanisms. This should be included in para 113 as a crucial policy area for discussion.

However, in the problem statement, the focus is primarily on women’s food insecurity, while nutrition is mentioned only with respect to the wellbeing of all members of the household. It would be important to reference data for gender inequalities in nutrition outcomes (with respect to different forms of malnutrition including BMI, anaemia and obesity for adults and adolescents as well as stunting, wasting and overweight for children under five) and quality of diet (for example using the indicators MDD-W, MAD).

In general the text for this section should be more focused on quality of diet and the two directional pathway whereby GEWGE leads to improved quality of diet and nutrition

⁴ See more detailed comments by EC for the first version of the Zero Draft.

⁵ See more detailed comments by EC for the first version of the Zero Draft.

outcomes (and other health outcomes), while improved quality of diet is an key enabler for gender equality and empowerment (e.g. by reducing fatigue and improving health). Care is required not to give the impression that interventions to treat micronutrient deficiencies (rather than to prevent them from occurring in the first place) are the primary response to meet women's special nutritional requirements, when in fact ensuring access by all to a healthy and balanced diet is the primary challenge.

The evidence regarding benefits of breastfeeding for women themselves would be important to reference in this section. Nowhere in the document is there any reference to the requirement for regulation of marketing (e.g. Code for Breastmilk Substitutes) as a crucial area of intervention to support women's ability to make choices.

There is also an important opportunity in this section to address the need to support adolescents and young people to make healthy choices, by regulating against aggressive marketing (e.g. via social media).

The statement that 'women and girls are more likely to suffer from malnutrition' remains questionable since (i) it does not qualify which form of malnutrition and (ii) does not make clear whether this is so universally (i.e. all women and girls are more likely) globally (based on global data) or in certain contexts. It should be noted that where there is robust disaggregated national data, it can often be the case that men and/or boys suffer more from a certain form of malnutrition than women and/or girls. (to give an example from Nepal, recent data indicates that more boys 6-59 months are stunted as compared to girls: 38% compared to 32%, while for adolescent boys wasting is significantly higher than girls: 23% compared to 14%). Globally the 2020 Global Nutrition Report shows that 31.6% of all boys 5-19 years are underweight compared to 25.9% girls.

3.10 "Social protection and food and nutrition assistance" (former 3.9):

In our contribution for the first version, we recommended having crisis contexts / humanitarian assistance (including FSN assistance) as a separate section (distinct from Social Protection). This is still not addressed now in the sense that FSN assistance remains in the heading. This makes little sense since social protection encompasses activities that may be described as FSN assistance – in fact it could be argued that practically all social protection contributes to FSN. This confusion (as if there is a distinction between social protection that is FSN related and social protection that is not) remains evident in this section.

Regarding para 119 on **school feeding** there would be several concerns with the text as it stands and a more nuanced position would be required bearing in mind the mixed (and sometimes weak) evidence, significant implementational challenges encountered and concerns related to financial sustainability.

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.

Not addressed: Beyond the opening section in which there is a passing reference and despite the fact that obesity is the form of malnutrition most attributable to women's illness and death. 39% of women globally are overweight and 15% of women are obese (11%

obesity for men) compared to 9.4% women being underweight (8.6% of men). Also there is not a single reference to NCDs despite this being a core issue related to FSN. Globally, 7.9% of all adult women have diabetes. (Source: Global Nutrition Report 2020). In general the profound implications of the 'nutrition transition' in terms of the coexistence of undernutrition with overweight and obesity as already poor diets increasingly incorporate ultra-processed foods – including among poor rural communities – are not captured in the document.