

## CFS Voluntary Guidelines on Gender Equality and Women’s and Girls’ Empowerment Comments from Canada

### General/Cross-Cutting Comments

- Wish to thank the Committee on World Food Security for taking into consideration the feedback shared by Member States, civil society, private sector, and other stakeholders over the last few months to develop the first draft of the Voluntary Guidelines.
- Pleased to see that previous Canadian comments were integrated into the formulation of this first draft, including (but not limited to): references to patriarchal structures, meaningful engagement and participation in decision-making processes, and Indigenous women.
- Welcome the focus throughout the document on gender-transformative approaches, as one of the core principles underpinning work in the food security and nutrition space.
- **Stakeholders responsible for the implementation of recommendations:** While understand that the Guidelines are geared towards governments as significant policy makers, would recommend, within the standard language added ahead of the recommendations listed in each section, ensuring that additional stakeholders are included to increase shared accountability.
- **References to Indigenous peoples and groups:** Capitalization of “Indigenous” has become a common practice and is a sign of respect for Indigenous nations. We would recommend that these references be capitalized throughout the document.
- **Sexual and gender-based violence:** Across Section 3.3, we would recommend using the term “sexual and gender-based violence (SGBV)”, as noted in the title of the section, in lieu of gender-based violence. SGBV is the preferred terminology that is increasingly being used in international normative frameworks; it is more comprehensive and inclusive.

| Page | Section | Suggested Revisions  | Rationale  |
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| 3    | 5       | Investing in women and girls and promoting gender equality and women’s and girls’ empowerment are not only the right things to do to achieve food security and nutrition, <del>[DEL: they are the smart things to do]</del> <span style="color: green;">[ADD: there are strong co-related socio-economic and environmental benefits]</span> .  |  |
| 3    | 6       | Discrimination against women and girls, pervasive gender inequality, barriers to decision-making and leaderships roles, and exposure to violence result in unequal access to food, with higher prevalence of food insecurity and malnutrition among women and girls, <span style="color: green;">[ADD: particularly those facing multiple and intersecting forms of discrimination]</span> . Rural girls face <span style="color: green;">[ADD: intersectional discrimination, such as]</span> <del>[DEL: the triple disadvantage of]</del> location, gender and age. The gender gap in accessing food increased from 2018 to 2019 and is expected to widen as the COVID-19 pandemic and the measures to contain it are having a negative and gender-differentiated impact on food security and nutrition. | What about other intersections? Indigenous women face significantly higher impacts of food insecurity. |
| 4    | 8       | Despite <del>[DEL: positive]</del> progress made over decades, gender inequality persists as women and girls continue to face multiple and intersecting forms  |  |

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|   |       | of discrimination in many areas. This manifests in unequal access to, and control over, key productive resources, assets, technologies, services, economic opportunities, and participation in decision-making processes at household, community and national levels, as well as unbalanced and unrecognized responsibilities in terms of unpaid care and domestic work - all negatively impacting various dimensions of food security: availability, access, utilization, stability, agency and sustainability, preventing women from benefitting equally from their work and creating barriers to food system inclusiveness, innovation and sustainability. |   |
| 5 | 11    | The Guidelines will provide concrete policy guidance based on good practices and lessons learnt on gender mainstreaming, gender transformative interventions and innovative solutions. They aim to contribute towards a <del>[DEL: gender-responsive]</del> <del>[ADD: gender-transformative]</del> approach, improving legal and policy frameworks, institutional arrangements, national plans and programmes, and promoting innovative partnerships and increased investments in human and financial resources that are conducive to promoting gender equality and women's and girls' empowerment.  | Would recommend aiming for gender-transformative approaches, rather than gender-responsive approaches (would also be aligned with previous sentence and section on core principles that underpin the guidelines). |
| 6 | 15    | The Voluntary Guidelines are complementary to and support national, regional and international initiatives, which aim at addressing all forms of discrimination against women and girls <del>[DEL: due to their negative impact upon food security and nutrition]</del> . In particular, CFS guidance should build upon and integrate existing instruments adopted on this topic within the context of the UN system.   | The language seems reductionist (i.e. only working to address gender inequality given impact on food security and nutrition).   |
| 6 | 16    | The Guidelines are intended for all stakeholders that are involved in addressing food security and nutrition, gender equality and women's <del>[ADD: and girls']</del> empowerment and leadership. They primarily address governments at all levels to help design and implement public policies, as their primary objective is to strengthen policy coherence between and across public sector policies at national, regional and global levels. They are also of value to other actors involved in policy discussions and policy implementation processes.  |   |
| 6 | 16 c) | Civil society, including women's, farmers' and small-scale food producers' organizations, trade unions of domestic, rural and agricultural workers, <del>[ADD: youth], as well as]</del> <del>[DEL: and indigenous]</del> <del>[ADD: Indigenous]</del> peoples;   | Do not want to imply that Indigenous peoples are part of civil society.   |
| 8 | 21    | <b>Empowerment of women and girls.</b> The Guidelines rest integrally on <del>[DEL: strengthening women's and girls' empowerment]</del> <del>[ADD: supporting the</del>   | Suggest removing reference to self-determination as this terminology is incorrectly used in this context.   |

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|    |         | empowerment of women and girls], recognizing them as right holders, agents of change and leaders. They build on the positive relationship between women’s and girls’ empowerment and achieving food security and nutrition. They recommend actions to ensure women’s and girls’ <del>[DEL: self-determination]</del> [ADD: agency] and autonomy, individually and collectively, <del>[DEL: and for them to gain voice and agency]</del> , taking active and meaningful part in decision-making to control their own lives and to strengthen strategic choices affecting their lives and livelihoods. |  |
| 9  | 24      | <b>Context-specific gender analysis and approaches.</b> The Guidelines promote inclusive and participatory context-specific gender analysis and actions - avoiding generalizations and stereotypes - that take into account [ADD: the diversity of women and girls’ lived experiences] the national, regional and local context and its impact on gender relations, roles and norms.   |  |
| 9  | 25      | <b>Intersectionality and multidimensional approach.</b> The Guidelines recognize that women and girls often experience multiple and intersecting forms of discrimination, affecting their food security and nutrition outcomes. The Guidelines promote a multidimensional approach that addresses these interrelated and mutually reinforcing deprivations, in particular for the <del>[DEL: indigenous]</del> [ADD: Indigenous] communities, and marginalized and disadvantaged women most affected by food insecurity and malnutrition.  |  |
| 9  | 28      | Enabling and promoting the equal and meaningful participation of women [ADD: , in all their diversity,] and women-led organizations, including women’s rights organizations and social movements, in marginal and vulnerable situations, including <del>[DEL: indigenous]</del> [ADD: Indigenous] women, is not only critical to ensure that policy goals respond to their priorities, but also offers a strategic means for overcoming social exclusion.  | This language recognizes that women are not one monolithic group.                                |
| 10 | 30(iii) | Ensure <b>equal access to justice and legal assistance</b> to <del>[DEL: enforce women’s rights]</del> [ADD: ensure that women’s rights are protected], including [ADD: on issues related] <del>[DEL: on]</del> [ADD: to] property in rural and urban areas, inheritance and financial services.   | Suggest reformulation for clarity.   |
| 10 | 30(vi)  | Promote <b>gender mainstreaming across different relevant sectors</b> , including [ADD: the] agriculture [ADD: and agri-food sector,] at all governmental levels as this supports women’s and girls’ participation and empowerment and creates impetus to address inequalities across a range of connected issues.   |  |
| 11 | 31 (iv) | Promote more sustainable gender equitable food systems such as those based on agro-ecological and other innovative approaches, and approaches  | Would welcome source/evidence on assertion that agro-ecological approaches are gender equitable. |

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|    |    | that enable more local ownership and control over production, and support the production of appropriate, healthy <del>[DEL: healthy]</del> <del>[ADD: healthy]</del> , affordable foods.   | Spelling error.  |
| 11 | 32 | Women and girls are more likely to suffer from different forms of malnutrition <del>[DEL: and overnutrition]</del> than men and boys, including undernutrition, micronutrient deficiencies, overweight and obesity, due to a combination of social, economic and biological factors. Therefore, policies and inter-sectoral interventions to support women’s and girls’ specific nutritional needs are of critical importance.   | Malnutrition refers to deficiencies, excesses or imbalances of nutrients. Malnutrition covers two broad groups of conditions namely, “undernutrition” and “overnutrition”, even in this context. Therefore, including “ <i>and overnutrition</i> ” in this text is repetitive and incorrect.   |
| 11 | 34 | These inequalities often play out through accepted and unquestioned cultural practices.  | Definition of “unquestioned cultural practices” is not clear – please clarify.   |
| 11 | 36 | Women’s nutritional needs vary depending on their life course and labour activities, with for instance special needs in <del>[DEL: iron and folic acid,]</del> micronutrients like iron <del>[ADD:, folic acid,]</del> and iodine for <del>[ADD: women of reproductive age,]</del> pregnant women and adolescent girls.  | Iron and folic acid are examples of micronutrients.<br><br>Micronutrient needs prior to pregnancy varies. Meeting these nutritional needs are of great importance to the health of the woman and the unborn child. A depletion of maternal micronutrient stores in the first pregnancy trimester could occur when some women do not know that they are pregnant and have yet to start micronutrient supplementation. |
| 12 | 37 | Gender discriminatory norms prevailing in <del>[DEL: certain]</del> <del>[ADD: many]</del> communities and societies discriminate adolescent girls and women from their right to access, demand and consume healthy diets. This predisposes them to increased risk for anemia, undernutrition <del>[DEL: and overweight]</del> and obesity.  | Suggest rewording for additional clarity. It’s contradictory to indicate “prevailing” in “certain” areas. It is pervasive in many societies.   |
| 13 | 43 | <del>[ADD: Sexual and]</del> gender-based violence <del>[DEL: (GBV)]</del> <del>[ADD: (SGBV)]</del> – whether physical, sexual, psychological or economic - is a universal problem. Food insecurity and <del>[DEL: GBV]</del> <del>[ADD: SGBV]</del> are linked in multiple ways. Changes in food security status can disrupt or intensify established or entrenched power imbalances between women and men and, thus, can drive increases in <del>[DEL: GBV]</del> <del>[ADD: SGBV]</del> in relationships, households and communities. Pressures on men to be family providers in time of food scarcity and/or rising prices may also fuel aggression and domestic violence. Intersectional factors intensify the risk of <del>[DEL: sexual and GBV]</del> <del>[ADD: SGBV]</del> <del>[ADD: including for women and girls who are from rural and resource-dependent areas, as well as Indigenous women]</del> . Defenders of human rights are often at heightened risk of violence. | The proposed language provides specificity about the kinds of intersectional factors that are directly related to food security, nutrition and SGBV.   |

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| 13 | 44      | <p>Humanitarian crises, including those resulting from climate change, conflicts, disasters and pandemics often exacerbate underlying gender inequality, vulnerabilities and the risks of sexual and gender-based violence. <del>[DEL: For example, COVID-19 and the associated social and economic stress has resulted in a dramatic rise in domestic violence cases globally.]</del> Women and girls with disabilities as well as women and girls from marginalized <del>[DEL: indigenous]</del> <del>[ADD: and Indigenous]</del> groups are often at heightened risk of violence and remain excluded from basic services and social support. <del>[ADD: Climate-related events and resource-driven conflicts are increasingly contributing to a rise in migration. Increased population density as a result of migration can heighten women’s and girls’ instability and insecurity while also limiting their access to food security and nutrition. Climate migration leads to higher rates of sexual and gender-based violence including harmful practices such as child, early and forced marriage (CEFM) and female genital mutilation/cutting (FGM/C). Therefore],</del> attention should be paid to preventing and addressing violence from the very onset of crises, with targeted approaches for survivors of violence, and special attention to the most disadvantaged.</p> | <p>While the example about COVID-19 is true, it is not clear what the relationship is between COVID-19, food security, and nutrition.</p> <p>Migration as a result of crises instead is an example that directly links humanitarian crises to food security and nutrition to SGBV. Moreover, it is important to note that in these times of crisis, the incidence of harmful practices such as FGM/C and CEFM increase.</p> |
| 13 | 45      | <p>The increasing scarcity of these resources due to over-exploitation, often in the context of large-scale unsustainable food production practices climate change, de-forestation and other factors such as privatization of water sources <del>[ADD: in addition to social and geographic isolation,]</del> means that women and often girls are obliged to travel ever longer distances putting them at higher risk of violence.</p>   |   |
| 13 | 46      | <p><del>[DEL: Sexual and gender-based violence]</del> <del>[ADD: SGBV]</del> severely undermines women’s and girls’ physical, <del>[ADD: spiritual or cultural,]</del> emotional and mental health, dignity and <del>[ADD: psychological]</del> well-being. Yet, it often remains shrouded in a culture of <del>[ADD: shame and]</del> silence.</p>   |   |
| 13 | 47 (ii) | <p>(ii) Implementing and strengthening existing national legislation <del>[ADD: to prevent and respond to SGBV]</del> and introducing new legislation where needed.</p>   | <p>Important to specify the kind of legislation that is being called for.</p>   |
| 14 | 47 (v)  | <p>(v) Improving reporting mechanisms <del>[ADD: i.e. data collection]</del> for <del>[ADD: S]</del>GBV <del>[ADD: including]</del> sexual harassment <del>[ADD: at corporate, community, and national levels]</del>.</p>   | <p>SGBV is more inclusive and comprehensive than GBV. It has been up for debate in multilateral forums whether sexual harassment constitutes SGBV, so by specifying that it “includes” sexual harassment, you specify the relationship that is intended between the two forms of violence.</p>  |

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|    |         |  | Useful to specify what kind of reporting mechanisms would assist in preventing and responding to SGBV, for example, at what levels.   |
| 14 | 48      | <del>[DEL: Unpaid]</del> Care and domestic work are critical to food security and nutrition. <del>[ADD: women’s paid and unpaid labour, particularly in the care economy, are considered as undervalued infinite resources, despite being essential to all economies and collective wellbeing.]</del> This work includes the preparation of food for the family, feeding and caring for children, the elderly <del>[ADD:; people with disabilities,]</del> and sick members in the household and community, and many other activities essential to human well-being and society as a whole. These unpaid care-related activities are often not recognized despite the reality that economies <del>[ADD: societies, and human well-being]</del> depend on them. | Both paid and unpaid care work are key issues for consideration.<br><br>For clarity and consistency with other UN texts, also consider using recognized language – older people rather than elderly, and adjusting the phrase “sick members” which may not be clear. E.g. “children, older people, and people with disabilities, illnesses or injuries”.  |
| 14 | 49      | On average, women do <del>[DEL: nearly]</del> <del>[ADD: over]</del> three times as much unpaid <del>[ADD: care]</del> work as men. It hampers women’s participation in paid activities in the labour market <del>[DEL: and]</del> <del>[ADD:;]</del> decision-making processes <del>[ADD: and public life], [ADD: education and training, and rest and leisure.]</del>  | The most recent global figures from the ILO suggest that women do, on average, 3.2 times more unpaid care work as men. If there is other data that you are referencing that includes other forms of unpaid work in order to say “nearly three”, it would be helpful to include a source.<br><br>These are two important outcomes of the unequal distribution of unpaid care work, but there are many others, including with links to nutrition and health outcomes. |
| 15 | 52 (ii) | Reduce unpaid work through public investments in <del>[DEL: welfare,]</del> social protection, provision of state-funded or subsidized child and elder care services, rural infrastructure (including the improvement of water supply, sanitation and hygiene facilities and access to electricity).   | As per paragraph 30 (iv), “welfare” can be considered a subset of social protection.  |
| 16 | 57 (i)  | Introduce and apply positive discrimination measures, such as gender quotas to ensure women’s representation in leadership positions in <del>[DEL: political parties,]</del> public and private sectors, access to education and participation in community organizations.   | Guidelines should account for divergent political systems including those in which political parties determine their own requirement for leadership roles.  |
| 16 | 58 (ii) | <b>Strengthen women’s organizations and women’s collective action.</b> The importance of self-association and the role of social movements to promote gender equality and women’s and girls’ empowerment in decision-making at all levels is recognized. Support should include direct funding for women’s rights organizations at both the local, national, <del>[DEL: and]</del> regional <del>[ADD:; and international]</del> levels. Supporting women’s rights organizations , <del>[ADD: including women’s and community-based organizations, feminist</del>  |   |

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|    |    | groups, women human rights defenders, girls' and youth-led organizations,] to take leadership roles in high-level food security and nutrition – and related processes – is critical to ensuring women's needs and expectations inform the policies and programs that affect them most.   |  |
| 17 | 63 | The structures and processes implicit in agricultural and fishery value chains <del>[DEL: are also]</del> [ADD: reinforce socio-economic and cultural sexist norms] <del>[DEL: gender-blind]</del> , excluding women.  |  |
| 18 | 66 | Food produced from crops managed by women is often retained for household consumption, offering marginal income opportunities. Moreover, as agricultural produce moves from farm to <del>[DEL: informal]</del> market, evidence indicates that women often lose control and opportunities for income generation along value adding processes. [ADD: Unequal access to end-markets often means that women are unable to directly monetise their crops and other agricultural produce, leading to a cascade of further exclusion in decision-making and control of resources.] Furthermore, even if women often grow high-value horticultural crops, such as vegetables for urban centers, lack of packing materials, cold chains and transportation result in high losses and low earnings. | Since unequal access to end-markets has numerous follow-on consequences for women, we propose additional text to emphasise this. |
| 18 | 70 | These analyses should also take into account intersectional forms of <del>[DEL: disadvantage]</del> [ADD: discrimination] and exclusion.   |  |
| 21 | 81 | Around the world, land serves as a foundation for security, shelter, income and livelihoods. However, rights to land are not equitably distributed and women encounter persistent barriers to [ADD: having their] land rights [ADD: respected in practice] in over half the countries in the world, despite [ADD: the existence of] laws and policies that enshrine those rights.  | Modification proposed for additional clarity.  |
| 21 | 82 | The impacts of climate change on women and men can differ, due to existing gender inequality and multidimensional factors and can be more pronounced for rural communities and <del>[DEL: indigenous peoples]</del> [ADD: Indigenous Peoples].   |  |
| 22 | 86 | Indigenous <del>[DEL: peoples]</del> [ADD: Peoples] also often have very deep knowledge of flora and fauna in natural sites. Failure to take into account knowledge of women and <del>[DEL: indigenous peoples]</del> [ADD: Indigenous peoples] in land, water, [ADD: agriculture,] fisheries, and forestry policy and planning can lead to poor outcomes, including loss of biodiversity, water pollution, soil degradation, loss of forest cover, and a failure to mitigate and adapt to climate change.   |  |

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| 22 | 91       | Special attention should be paid to the legitimate tenure [ADD: and inherent] rights of Indigenous Peoples, and to the importance of free, prior and informed consent, critical for their food security, livelihoods and culture.   | Should refer to the UN Declaration on the Rights of Indigenous Peoples.  |
| 23 | 93 (iii) | Ensure women’s participation, including [DEL: indigenous] [ADD: Indigenous] women, in the management and governance of natural resources at all levels, including of customary institutions, recognizing the importance of traditional [ADD:, Indigenous,] [DEL: knowledge] and local [DEL: crops] [ADD: knowledge systems].  | <p>“Indigenous knowledge” is more encompassing than “traditional knowledge” as it is not restricted to knowledge from the past and allows for innovation/evolution with time.</p> <p>Not sure what is meant by reference to local crops.</p> |
| 26 | 110      | Social protection programmes can have direct positive impacts on food security and nutrition by giving access to more [ADD: nutritious] food and healthier diets [DEL: nutrition] for women and their families, particularly in times of crisis. The first 1,000 days are critical for children’s nutrition. Therefore, interventions that support a healthy pregnancy, safe childbirth, exclusive breastfeeding for 6 months and diversified nutritious complementary feeding are crucial. | <p>Adding “nutritious” to qualify the type of food is consistent with other UN widely used and acceptable language.</p> <p>The use of nutrition here is a grammatical error.</p>   |