

USG Interagency Comments on the CFS Voluntary Guidelines on Gender Equality and Women and Girls’ Empowerment in the Context of Food Security and Nutrition
02.18.2022

Paragraph	Comment
Overarching Comments	<p>We appreciate the inclusion of many of the USG priorities, including the specific sections focused on gender-based violence (GBV), recognition, reduction and redistribution of unpaid care and domestic work, women’s economic and social empowerment, and women’s access to and control over natural and productive resources, among others. We also support the mentions of engaging men and boys, as well as a wide range of stakeholders as allies, focus on collection of gender-disaggregated data, and closing the gender digital divide as potential solutions.</p> <p>However, we want to note that his draft is very long and would benefit from streamlined guidance. The drafters may find ways to cut paragraphs from the “issues and challenges” sections in order to focus and draw more attention to the recommendations.</p> <p>We also want to note that while we support the majority of the recommendations laid out in this document, many recommendations are broad or not necessarily tied directly to food security. We suggest trying to make these recommendations more specific.</p>
Para. 4	<p>Redline: Recommend the following edit:</p> <p>“Currently, the global food system produces enough food to feed every person on the planet. However, due to a range of diverse challenges, an increasing number of people in both rural and urban areas are failing to realize their right to adequate food and meet their daily food and nutrition needs”</p> <p>If reverted to some articulation of language on this as a right, the language should be edited to conform to that in UDHR (Art 25) and ICESCR (Art 11) as “right to an adequate standard of living, including food” or alternatively as either “right to</p>

	adequate food, as a component of the right to an adequate standard of living” or “progressive realization of the right to adequate food in the context of national food security” as it appears elsewhere in this document.
Para. 7	Revise sentence: “Supporting women’s to claim their rights to equal access to agricultural resources would raise total agricultural output by 2.5–4 percent” The original reference in 2011 SOFA is NOT specific to rights.
Para. 8	Suggest the following edit to the section “all negatively impacting various pillars-dimensions of food security”
Para. 8	Redline: “...availability, access, utilization, stability, agency and sustainability ... preventing women..” agency and sustainability are not internationally recognized pillars of food security. Suggested edit "... availability, access, utilization, and stability, limiting women's agency and preventing them from benefitting equally which create barriers to food system inclusiveness, innovation and sustainability ”
Para. 11	Suggest the following edit “they aim to contribute towards a gender-responsive gender transformative approach, improving legal and policy frameworks...” Also suggest consistent reference to “gender transformative approach”.
Para 12.	Suggest the following edit: “The Guidelines aim to foster greater policy coherence among gender equality and women’s and girls’ empowerment and food security and nutrition agendas, and promote mutually reinforcing policy measures ”
Para. 14	Suggest revising the para - drawing directly from the already agreed upon language in VGFSyN below: 37. The VGFSyN are voluntary and non-binding. 38. The VGFSyN are intended to be interpreted and applied consistently with existing obligations under relevant national and international law, with due regard to voluntary commitments under

	<p>applicable international and regional instruments. Nothing in the VGFSyN should be read as limiting or undermining any legal obligations to which States may be subject under international law.</p> <p>39. The VGFSyN are intended to be interpreted and applied in accordance with national legal systems and their institutions. They should be implemented within countries and at regional and global levels, taking into account different national realities, capacities and levels of development and respecting national policies and priorities.</p>
Para. 16(c)	The list should include “religious and faith-based organizations”
Para 17	<p>Suggest the edit below to eliminate confusing as specific conventions are already listed in other bullets</p> <p>“Universal Declaration of Human Rights – adopted by the UN General Assembly in 1948 and human rights treaties which are binding for the respective State Parties”</p>
Para. 19	<p>Redline: Commitment to Human Rights and Realization of the Right to Adequate Food Progressive Realization of the Right to Adequate Food in the Context of National Food Security. Achieving gender equality and women’s and girls’ empowerment is fundamental to the realization of human rights, including the right to adequate food progressive realization of the right to adequate food in the context of national food security.</p> <p>The Guidelines are consistent with, and draw on, international and regional instruments, including the SDGs that address human rights. All programmes, policies and technical assistance to strengthen gender equality through the implementation of these Guidelines should be consistent with States’ existing obligations under international law, including the Universal Declaration of Human Rights and other international human rights instruments.</p> <p>We suggest the following edit, “existing obligations under international law including the</p>

	<p>Universal Declaration of Human Rights and other international human rights instruments.”</p>
<p>Para 20</p>	<p>Redline: No one should be subject to discrimination under law and policies as well as in practice. States should ensure the equal right of women and men to the enjoyment of all human rights, while acknowledging differences between women and men and taking specific temporary special measures aimed at accelerating de facto equality when necessary as appropriate.</p> <p>Footnote 10 is problematic. It seems to try to collapse two separate provisions of CEDAW, articles 2 and 5, into a single obligation, which is inaccurate. It should never be suggested that different provisions of a treaty are part of the same provision, since different provisions often contain different obligations. It’s also odd that the footnote cites Arts 2 and 4 when the text that is being footnoted concerns temporary measures, which are addressed in Art. 4 of CEDAW.</p> <p>Suggest revising the footnote to read: “CEDAW, Article 2 and 5: “States Parties condemn discrimination against women in all its forms, agree to pursue by all appropriate means and without delay a policy of eliminating discrimination against women and, to this end, [...] to take all appropriate measures to eliminate discrimination against women by any person, organization or enterprise [...] to modify the social and cultural patterns of conduct of men and women”.</p>
<p>Para. 28</p>	<p>The focus of the para. should be expanded beyond “policy and law making” to include women’s participation in the implementation and oversight of implementation of policies and laws.</p> <p>More broadly: where there are recommendations surrounding drafting/implementing legal frameworks, we want to also include language to ensure that those legal frameworks are also being enforced.</p>
<p>Para. 28</p>	<p>Suggest edits as below to reflect the commonly used UN system language which is “human rights-based approach” or language such as “consistent with international human rights law”</p>

	<p>“Inclusiveness and participation in policy- and law- making. The Guidelines promote policies and legal frameworks that are consistent with international human rights law (or that respect the human rights of all individuals) people-centered and based on the participation of all women and girls, with respect for diversity”</p>
Para. 30 (iv)	<p>Edit as noted in red “Ensure, where possible, that targeted social protection measures – including cash and food transfers, school feeding, pensions and social welfare measures – are in place to support the poorest, including women and girls, also during times of vulnerability, emergency and protracted crisis”</p>
Para. 31 (iv)	<p>Suggest edit as follows: Promote more sustainable gender-equitable food systems that are gender equitable such as those based on agro- ecological and other innovative approaches, and approaches that enable more local ownership and control over production, and support the production of appropriate, healthy, affordable foods.</p> <p>In the Para above, please also clarify what “appropriate” means. Is the intention to say “culturally appropriate”?</p>
Para. 33	<p>Add to the second sentence: “lack of access to and control over land,”</p>
Section 3.3.	<p>We appreciate that intersectionality is a core principle, but the current GBV section focuses heavily on women and girls. Acknowledgment that women and girls from marginalized communities, and LGBTQI+ individuals face increased rates of violence would be beneficial.</p> <p>Language switches between “sexual and gender-based violence”, “gender-based violence”, and “violence against women and girls”. The USG prefers GBV, but SGBV and GBV are both preferable to the less-inclusive VAWG language.</p>
Para. 44	<p>Remove word “marginalized” in the third sentence</p>
Para. 44	<p>In line with the economic pressures and power dynamics mentioned in Para 43, this section would be strengthened by mentioning that incidences of child, early, and forced marriage (a</p>

	<p>type of GBV or “harmful practice”) often go up during times of food scarcity and economic insecurity.</p>
<p>Para. 45</p>	<p>Redline: delete references to “privatization of water resources” and “large scale unsustainable food production”</p> <p>USG sees privatization of water resources more nuances than represented here. Specifically USG supports private sector management and financing of water and sanitation services globally, where it is appropriate and feasible from economic, environmental, political, and social perspectives.</p> <p>We do not support the link drawn between resource over-exploitation and large scale unsustainable food production, especially in a section on GBV.</p> <p>Rural women and girls often face gender-based violence in carrying out their daily responsibilities, such as collecting water and fuelwood. The increasing scarcity of these resources due to over-exploitation, often in the context of large-scale unsustainable food production practices, climate change, deforestation and other factors such as privatization of water sources means that women and often girls are obliged to travel ever longer distances, putting them at higher risk of violence.</p>
<p>Para 47</p>	<p>Overall these recommendations are fine, but similar to the overarching comment, they are very general GBV recommendations. They would be more helpful, and make more sense in this guidance, if they focused on GBV policies and approaches that could be strengthened within the food security and nutrition sector. For example, improving reporting mechanisms is a broad, common goal but specific suggestions on how to do this within the food security sector or the specific types of actors who are best placed to focus on this would move this work forward.</p>
<p>Para 47</p>	<p>“Implementing existing relevant international obligations and commitments, including the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)”</p>
<p>Para. 48</p>	<p>Suggest changing language to read: “such as planting, tending, irrigating, and harvesting...”</p>

<p>Para. 49</p>	<p>Edit for the full para to read:</p> <p>However, this work is often not equally shared. On average, women do nearly three times as much unpaid work as men. It hampers women’s participation in paid activities in the labour market and decision-making processes , including women’s meaningful participation in governance institutions and activities. These unpaid care-related activities are often not recognized despite the reality that economies depend on them. Activities often undertaken by women relating to food production, such as planting, irrigation and harvesting crops and processing fish, are also often unpaid and unrecognized despite their enormous economic and social value</p>
<p>Para. 50</p>	<p>Redline: description of highly processed and non-perishable foods. They can increase food safety and food security, which would empower women. It’s not as simple as this describes.</p> <p>Suggest the following re-write to the instead:</p> <p>Often the inequitable gender-based allocation of unpaid domestic work can impact diets and nutrition, through a lack of control over resources to purchase food, poorer food choice, and mental stress.</p>
<p>Para. 52 (iii)</p>	<p>We suggest expanding the investments in labor saving technologies beyond production and suggest including the phrase “as appropriate”, to avoid implying that this document supports forced tech transfer.</p> <p>“Fund the provision of labour-saving technologies for domestic work as well as agricultural and aquatic food production and processing, as appropriate.”</p>
<p>Para. 52 (iv)</p>	<p>With regard to flexible work arrangements, we suggest softening “ensure” to “support”.</p>
<p>Para. 53 (ii)</p>	<p>May be useful to cite a few sources of successful maternity/paternity leave policies. As this reads, it’s not very actionable.</p>
<p>Para. 53</p>	<p>Add subpara (iii): Provide women and girls with support they need to meaningfully participate in</p>

	governance institutions and activities, such as providing for childcare.
Para. 57 (i)	Redline: we do not support the reference to quotas and suggest the following edit to the para: Consider as appropriate introducing and applying positive discrimination measures, such as gender quotas to ensure women’s representation in leadership positions in political parties, public and private sectors, access to education and participation in community organizations.
Para 57 (iii)	Please clarify what is meant by “mobilize young women”
	Move sentence from end of Para 60 to end of Para 59: To read: In rural areas, women are more likely to be employed in labor-intensive tasks, earning lower wages than men, and to be paid a piece rate rather than a daily wage. Women often lack access to social protection systems and to information about their rights as employees.
Para. 67	Add “access to digital and other technologies” to the second sentence.
Para. 68	Reference to CEDAW is not necessary nor accurate. Other instruments, including the ICCPR, obligate states parties to respect the human rights of women, without discrimination on the basis of sex. Suggest revision: Although the human rights of women are legally enshrined at the international level in the CEDAW, women Women still face many legal constraints that restrict their ability to access and benefit from productive resources including land and opportunities. Equal legal rights are usually associated with better and more secure income in the labor market for women and consequently with higher spending on food and nutrition for themselves and children.
Para. 82	Add “Climate-induced weather-related events have severe impacts on the value and availability of natural resources...”
Para. 83	Add: - limiting their ability to request and receive government subsidies or financial services.

Para. 90	Agroecological and other innovative approaches could improve the sustainability and inclusiveness of agriculture, fisheries and food systems because of their holistic approach and emphasis on equity, embracing the economic, social and environmental dimensions of the food systems and contributing to the local production and availability of affordable, healthy, culturally appropriate food.
Para. 92(1)	Add “and divorce” to the end of the sentence.
Para. 92	Add new sub-para (v): “Promote and support women’s employment and leadership in land administration and surveying offices at all jurisdictional levels.”
Para. 110	Social protection programmes can have direct positive impacts on food security and nutrition by giving access to more food and healthier diets 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.
Para 110.	This para confounds crisis w/ priorities re first 1,000 days for child nutrition. Need to make the connection clearer or separate out into 2 paras
Para 112.	Redline: there is no human right to social protection as such (there is a human right to social security under the ICESCR and UDHR, but it’s not clear whether they mean something else here?). Absent additional information, this para needs to be deleted.
Para. 113 (i)	Ensure access to adequate social protection ensured through a comprehensive legal framework. Social protection programmes should be comprehensive and accessible by all who need them throughout their life course. They should also be agile enough to respond to shocks, paying attention to women’s and girls’ special needs, including nutritional needs.
Para 116	Persistent rain or drought lead ing to the failure of vital crops such as cereals and a

	drop in production of highly nutritious foods such as vegetables, fruit and animal-source foods in many of the world’s poorest countries.
Para 123	Edit to acknowledge the necessity of lockdowns as part of the public health effort. While unavoidable and lifesaving, the public health measures associated with COVID-19 pandemic have had the effect of amplifying and deepening existing gender inequalities....
Para. 128(i)	Add: “ (i) Strengthen resilience in the face of climate change and biodiversity loss and environmental degradation, particularly for women farmers, pastoralists and women engaged in fisheries ”
Para. 128	Add sub-para (xii): “Support women and build their capacity to engage directly as peacebuilders as a critical component of humanitarian response efforts.”
Para 128 (v)	Enable women to Support participation of women in the discussions and decisions over climate change mitigation and adaptation. This includes discussions under the UN Framework Convention on Climate Change (UNFCCC) that supports climate change activities in developing countries, related to agriculture and in similar climate related policy dialogues in their countries and communities.
Para 128 (viii)	Support environmentally sustainable, locally owned, small-scale agricultural production to avoid over-reliance on external value chains and prices, which often undermine women farmers’ market power and have a direct impact on women managing food provision in the household. Support environmentally sustainable and, where appropriate, locally owned, small-scale agricultural production as a way to empower women farmers.
Para. 134	Request clarification – it is unclear what is meant. Is this work that CFS is currently doing or is this document giving a mandate to CFS? Is “a selected set of indicators among the global indicators

	adopted together with the 2030 agenda” another way of saying the SDG indicators?
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