

OFFICIAL

Dear Anthony, Fabio and colleagues from the CFS Secretariat

Australia appreciates the opportunity to provide written comments on the Zero Draft (outline) of the Policy Recommendations . Please find our comments below:

Australia fully appreciates the significant benefits and transformative potential of enhanced data collection and analysis for improved food security and nutrition outcomes. We look forward to contributing to the development of concise, useful and actionable voluntary policy recommendations that can be used by countries to guide their work and policy-making processes. We welcome the opportunity to review the Zero Draft (Outline) and provide the following comments:

- We reiterate the importance of aiming for a concise and targeted document which focuses on the development of a set of recommendations that can realistically be agreed upon within the allocated timeframes for this process. Currently, the scope of the document is quite ambitious and we request that there be a prioritisation exercise undertaken, to narrow the focus of the document to core recommendations that would help to address data gaps, enhance data-literacy of relevant stakeholders and improve the production, analysis and use of data and statistics for decision-making. It will also be important to ensure that the recommendations are demand-driven.
 - Specifically in relation to the current framing of the rationale, we note that it tends to focus on “current status” (i.e. problems faced, and solutions posed) rather than outlining the driving rationale behind development of the guidelines. We consider there would be value in some higher level contextual information outlining the value of FSN data for decision making and for achieving the 2030 Agenda and its SDGs (i.e. the “why it matters”).
 - We have identified a few practical ways that related thematic content could be merged to minimise the potential for duplication – including by merging various sub-elements of points 2, 3, 4 and 5:
 - Improving data literacy and education currently listed under **Point 5: invest in human capital** [...] is likely to be quite related to **Point 2: create greater awareness and greater demand for better use of FSN data in decision-making**. We suggest bringing this element of **Point 5** under **Point 2**.
 - We suggest the element relating to the multidisciplinary approach and multi-stakeholder approach for filling data gaps in **Point 3: increase and sustain investment** could be placed under **Point 4: increasing collaboration between all parties**.
 - We suggest the infrastructure and technologies elements of **Point 5** could be brought under **Point 3** as there is a consistent theme of increased investment.
- Throughout the negotiating and drafting process, it will be essential to apply the principle of “no one size fits all” and ensure that the recommendations, which will necessarily be global and high-level in scope, are simultaneously flexible enough to help address the needs and requirements of relevant stakeholders in their specific contexts. For instance, we note that the zero draft proposes to define FSN data in the first section, and subsequently seeks to define a subsection of “essential data” in the third section. We suggest that rather than seeking to embark upon a complex exercise to definitively demarcate what constitutes FSN

- data and what does not (and create subsections of data that is essential and that which is not), it may be more useful and effective to provide higher-level examples or categories that countries and other relevant stakeholders can consider as potentially useful FSN data, in their application of the guidelines, as appropriate. This approach is consistent with the principle of no one size fits all, and recognises the diversity of relevant data sets that are likely to be applicable across different local and national contexts.
- Additionally, it will be important to ensure alignment with the CFS mandate and not duplicate the work of other UN agencies or international bodies, including the UNSC. In this regard, we recommend taking a pragmatic approach and not seeking to address complex data governance matters within the scope of this document, given the debates and discussions taking place at other levels in the UN system more broadly. In the governance field - we consider that this workstream would better focus on identifying practical and actionable recommendations to enhance data harmonisation, interoperability and quality control – noting also the clear alignment of these elements with the mandate of this workstream, as per the MYPOW 2020-23.

We would be open to discussing these comments further as you wish. We look forward to receiving further updates and engaging in future processes related to this workstream.

With thanks and kind regards

Ben