

Comments from the United States on the CFS Draft Outline of Policy Recommendations on Data
February 13, 2023

General Comments:

- The document needs to be targeted and stick closely to what was agreed when the MYPoW was endorsed. It should steer clear of topics that are more appropriately covered in other fora.
- The document does not mention encouraging open access to data. The mention of data governance at times implies the opposite—more data ownership rather than openness. If CFS is promoting UN global collaboration on this initiative, it should at least encourage countries to share and provide free and open access to FSN data. This can also come with the caveat that data will be anonymized to protect individual privacy.
- With regard to how raw data will be used for analysis, the description mentions it but should go one step further to discuss coordination on the specific indicators that will be prioritized and harmonized, so that we are encouraging collection of the right kinds of data to produce those indicators.
- It would be helpful to have a discussion of surveillance data, and the importance of having some high-frequency and high-quality surveillance data for tracking, predicting, and preventing food and nutrition security crises.
- More clarity should be given on the type of data CFS is discussing. Individual level data and dietary data are most important for nutrition, as are anthropometric and biomarker data. Food security data is most often collected at the household, national, or market level.

Section 1:

- Throughout the document, CFS should stick to the four pillars of food security (availability, access, utilization, stability) which are internationally recognized. Agency and sustainability move outside of the scope of food security and data.
- While harmonization of data across FSN data sets is a laudable goal, the intended goal should be to educate policy makers on the different FSN data they have and how they can use them and increase the coordination across producers of that data.
- While we agree that resource poor countries need support, national governments in these countries should make this a priority in their national budgets as well, which should be reflected in the document.

Section 6:

- The concept of data governance is not well defined in this document. Further, discussions on data governance (and intellectual property) are beyond the scope of this workstream and are covered in other international organizations.
 - If this section remains, it needs to draw extensively from other IO's and multilaterally agreed language. It is not useful for CFS to provide contradictory or confusing guidance and it does not have the technical expertise.