Australia's comments on the Zero Draft of the Policy Recommendations on Strengthening Data Collection and Analysis Tools for Food Security and Nutrition

Australia appreciates the work undertaken so far in development of the Zero Draft, version 14 March 2023, and would like to provide the following comments for consideration:

- We welcome the "no one size fits all" approach in the development of the recommendations to
 ensure they are sufficiently flexible to help address the needs and requirements of relevant
 stakeholder in their specific contexts.
- In paragraph 5, we suggest the removal of the word *locally* from "*locally produce and access food*". Its inclusion seems unnecessary considering data gaps, which are the object of the paragraph, exist irrespective of where food is produced. A focus on locally produced food would also overlook the critical contribution of trade to food security and be inconsistent with the reference to this same theme in recommendation 2(a).
- We reaffirm the importance of aiming for a concise and focused document with realistic and achievable recommendations, drawing on expertise from other UN agencies and international bodies, rather than duplicating efforts. We question the utility of recommending the creation of new bodies and structures if something similar in nature already exists. This includes recommendation 2(h) encouraging the development of a Global FSN Data Trust Fund, and recommendation 4(a) suggesting the formation of a joint commission. Such recommendations should be carefully evaluated in terms of the purpose they serve and the sustainability of human and financial resourcing requirements.
- Moreover, it is important to ensure alignment of the policy recommendations with the CFS
 mandate and, in this regard, we suggest that there is a focus on referencing emerging
 international data governance frameworks rather than attempting to address complex data
 governance matters within the scope of this document.
 - We suggest that recommendation 5(a) should promote the inclusion of FSN data within
 a countries broader data governance system, which complies with emerging
 international data governance frameworks, rather than the establishment of a
 standalone FSN data governance system.
- Finally, we support the coordinated release of knowledge products and emphasise the need for these to be accessible to all stakeholders and conscious of their length and useability.