

CSIPM contribution to the zero draft “CFS Policy Recommendations on Strengthening FSN Data Collection and Analysis Tools for Food Security and Nutrition”

14th of April 2023

Introduction

The following reflects the comments developed by the Civil Society and Indigenous Peoples’ Mechanism (CSIPM) of the CFS on the zero draft “CFS Policy Recommendations on Strengthening FSN Data Collection and Analysis Tools for Food Security and Nutrition”.

The CSIPM welcomes the CFS's engagement with data collection and analysis tools, including new emerging technologies, with the potential to transform our food system, and thus, food security and nutrition, in both positive and negative ways. We recognize that the CFS, as the most inclusive international and intergovernmental body with the explicit vision to foster the progressive realisation of the right to adequate food for all, is the appropriate and necessary place to hold an inclusive and transparent debate on the technologies that will greatly affect the future of food security and nutrition.

Data-driven technologies are being introduced by agribusiness companies, often through partnerships with large tech companies and often with the support of public policies, at a very rapid pace. As a result, data on food systems is now emerging as one of the most valuable commodities. A massive accumulation of digital information—on land, seeds, plant genetics, livestock, workers, production systems, territorial markets and consumer behaviour—as well as the unequal capacity to analyze and process data - is concentrating power over food systems into the hands of a few and putting future food security in jeopardy. The HLPE report spent an entire chapter exploring these technologies and acknowledged their risks. These risks are nearly absent in the zero draft.

The current process offers the opportunity to set the course for using data to achieve the human right to food and nutrition. We will take this opportunity to address concerns we have about the content of this zero draft.

- Neglect of the risks of digitalisation
- Concept of Data as "open by default"
- Poorly defined data governance

In the zero draft the narrative is served that the more data collected the better. We as CSIPM advocate that the collection and processing of data should be goal-oriented (namely the achievement of the human right to adequate food and the improvement of decisions in this regard) and regulated. In addition, we would like to see the risks thematised. Data are not neutral, but rather reflect social power relations and forms of discrimination within society.

Therefore, we would like policy recommendations to include a comprehensive

assessment of the current digital technologies and their impact on the food system.

The risks of digital technologies are numerous. They can lead to dependencies, conflicts of interests, and the concentration of power in the hands of a few. However, there are also ecological damages and risks. Collecting, processing and storing data requires an enormous amount of energy and rare minerals are needed for the infrastructure. These risks are hardly or not at all mentioned in the zero draft. However, we surely acknowledge that Data for FSN represents a valuable tool to inform food system actors on solutions to face food systems related challenges. To prevent the above-mentioned risks, and ensure a FSN-driven data use, the role of communities in the co-creation of data, in relation to their local knowledge, should be prioritize. The agency of communities and smallholders (one of the 6 FSN dimensions) in data co-creation, analysis and use should be a basic principle of these recommendations. Co-created data driven by local FSN priorities, are nourishing a circular cycle of data (where data inform actions, policies and initiatives themselves providing new data for further actions) under public control. These elements are contributing to maintain FSN data out of the risks mentioned above.

The approach that data should be open by default runs like a red thread through the entire document. While this was once a progressive demand, it now is at risk to only serve the interests of the big tech companies, as only they have the capacity to analyse and process the enormous amounts of data. The CSIPM has four major concerns regarding open access Data:

1. The capacity to benefit from open data is highly unequal amongst actors. opening up data enables only those with the education, capital, and social status to make use of it, effectively empowering the empowered.
2. Open data provides a public subsidy to private sector interests. Even if the data is publicly available, only a few actors have the capacity to analyse and process these enormous amounts of data and so generate private profit. Furthermore, it allows the imposition of industrial patents on information that are extracted.
3. Open data does not respect Indigenous knowledge and data sovereignty. Instead it can be seen as a free appropriation regime, in which Indigenous biocultural knowledge and resources have been systematically extracted with little or no consent not recompense ([Link](#)).
4. Open data does not protect the interests of peasants, smallholders, and other rural workers, instead it creates dependencies. Open data currently favors agri-tech startups and agribusiness whose business models are often premised on the ability to gather large amounts of farm-level data (for free) analyze this data, and sell back to farmers. These systems are likely to reproduce the “technological treadmill”, resulting in small farmers unable to stay ahead of falling prices, and ultimately exiting farming. Highly technical, bundled systems tend to create *technological lock-ins* and, over time, *cognitive lock-ins* due to deskilling that occurs with automation.

Instead of open access data we suggest to see data as a common that needs to be governed. This is easier to imagine than to accomplish. Much work remains to be done to

develop practical frameworks for protected data commoning at and across different scales of governance. The OEWG policy recommendation could be to explore the design and implementation of such data governance, underscoring in particular the rights of peasants and other people working in rural areas (per UNDROP) and Indigenous people (per UNDRIP) aligned with Care Principles (of collective benefit, authority to control, responsibility, and ethics), ILO principles, CBD and the ITPGRFA. While the HLPE report puts governance at the centre, we find little ambition in the Zero draft. Governance is only addressed at the end of this draft and the proposals are not very ambitious.

Last but not least, we would like to express our concerns about the current CFS process. On the one hand, there are blatant conflicts of interest, as the Bill and Melinda Gates Foundation, the financier of this process, is not a neutral actor for obvious reasons. In addition, there is a low level of participation by countries from the global South. For us as civil society, this is aggravated by the fact that no translation has been provided in the process so far. This makes an inclusive and transparent political process more difficult. Furthermore, we are critical of the ambitious timetable of the CFS process, as it does not allow for a proper debate. The digital innovations of recent years have the potential to change the food system enormously, with the power of certain tech companies challenging state sovereignty. This development is of concern to society as a whole that Governments and international institutions should carefully address, as in the case of AI ([link](#)). But instead of giving space to this broad discussion, we experience a rushed process and the intention of certain actors to remove governance from the document and reduce it to purely technical aspects.

Detailed comments on the individual paragraphs are listed below. The paragraphs of the CFS zero draft are listed in the left-hand column and the CSIPM comments in the right-hand column. Some of the comments consist of concrete proposals for changes, while others outline alternative content.

CFS zero draft	CSIPM comments
<p><u>CFS POLICY RECOMMENDATIONS on STRENGTHENING FSN DATA COLLECTION and ANALYSIS TOOLS for FOOD SECURITY and NUTRITION</u> Zero Draft – 14 March 2023</p>	<p>According to the CFS’ decision, the OEWG’s mandate is to develop recommendations on the use of “data to improve critical decision-making around food security and nutrition policies.” This focus on the collection and use of data <u>for decision-making</u> to realize the right to food and nutrition should be reflected throughout the document, including in the title and para. 1 of the rationale</p>
<p>RATIONALE</p>	<p>References to definition on "quality data" is missing</p>
<p>1. High-quality, timely and relevant Food Security and Nutrition (FSN) data are <u>key</u> to inform local, national and global actions that promote food security and better nutrition.</p>	<p>According to the CFS’ decision, the OEWG’s mandate is to develop recommendations on the use of “data to improve critical decision-making around food security and nutrition policies.”</p>

<p>Capacities to produce, interpret and use FSN data, and institutional arrangements that promote the use of data to guide FSN policy, are also essential. In line with the approved CFS Multi-Year Programme of Work (MYPoW) 2020-2023, the purpose of this document is to provide specific and actionable voluntary policy recommendations for strengthening the capacities of actors involved in the collection, analysis, dissemination and the use of quality FSN data. The overall goal is to contribute to the CFS vision of the progressive realization of the right to adequate food. The recommendations are informed by the CFS High-Level Panel of Experts on Food Security and Nutrition (HLPE-FSN) Report 17 “Data Collection and Analysis Tools for Food Security and Nutrition: towards enhancing effective, inclusive, evidence-informed decision making” (2022).</p>	<p>This focus on the collection and use of data <u>for decision-making</u> to realize the right to food and nutrition should be reflected throughout the document, including in the title and para. 1 of the rationale and be consistent with international instruments as UNDROP, UNDRIP, ILO, CBD, and others.</p> <p>Remove <u>key</u>: ADD: FSN data <u>should be considered as one factor</u> to inform...</p>
<p>2. Data refers to any set of codified symbols representing units of information regarding specific aspects of the world that can be captured or generated, recorded, stored, and transmitted in analogue or digital form. For the purpose of these policy recommendations, Food Security and Nutrition data is defined as data that describes and/or measures <u>individual</u> food security and nutrition outcomes and/or provides evidence and promotes understanding of micro-, meso- or macro-level determinants influencing these outcomes across the dimensions of FSN: availability, access, utilization, stability, <u>with consideration of evolving discussions regarding</u> agency and sustainability.</p>	<p>The definition of FSN data in para. 2 is vague and abstract. Providing some examples would make the concept more concrete. In this context, it could be useful to refer to existing voluntary guidelines and policy recommendations developed by the CFS to exemplify what kind of data should be collected and used to implement them with the objective of realizing the right to food and nutrition.</p> <p>Delete: “<u>with consideration of evolving discussions regarding</u>”</p> <p>After <u>individual</u>, ADD: <u>and community level</u></p>
<p>3. This definition recognizes the importance of different types of data, qualitative as well as quantitative, and of adopting a systemic view for FSN data, which highlights the fundamental roles of actors spanning the food system, from producers to consumers, in the production and assessment of relevant FSN data.</p>	<p>It is important that para. 3 mentions the existence of different types of data as well as the importance of both qualitative and quantitative data. However, it should be pointed out in this context that Indigenous Peoples and small-scale food producers have their own knowledge and innovation systems, which need to be considered and protected, according to states’ obligations under international and domestic law. Another point, highlighted by the HLPE report, is the importance of participatory and horizontal processes of data co-creation, where different actors (State bodies, communities, experts,...) are cooperating on an equal footing.</p> <p>ADD: which needs to be considered and protected on the base of FPIC (Free, Prior and Informed Consent) (https://www.fao.org/indigenous-peoples/our-pillars/fpic/en/)</p>

	<p>ADD: This definition also recognizes the importance of the co-creation of data for FSN where different actors (State bodies, communities, experts,...) are cooperating on an equal footing.</p>
<p>4. It is important to note that extensive FSN data already exists, at least for some dimensions of food (in)security, albeit with varying degrees of quality and granularity. However, they are often not accessible nor properly utilized by policymakers, who are often unaware of the existence and relevance of such data. Data relevant to inform FSN policies are often housed across diverse sectors and organizations and may not be intuitively linked to FSN. As a result, decision-makers face challenges at each step of the data cycle.¹</p> <p>1 The <u>data cycle</u> comprises the following steps: defining priorities and data needs; reviewing, consolidating, collecting and curating data; analyzing the data using appropriate tools; translating data into relevant insights to be disseminated and discussed; and, finally, using data for <u>decision-making</u>.</p>	<p><u>Data cycle</u>, ADD: This data cycle needs to be repeated on a regular, defined basis, and in times of crisis or instability, to ensure the data and decisions continue to be relevant.</p> <p>After <u>decision making</u> ADD: Effective Data Governance and inclusiveness across all FSN related Data systems is at the centre of the data cycle.</p>
<p>5. Fundamental data gaps still exist to effectively guide action and inform policymaking, especially timely and sufficiently granular data on <u>people’s</u> ability to locally produce and access food, on their actual food and nutrient consumption, and on their nutritional status. More data and information from actors across the food system that shed light on the <u>structural determinants</u> of FSN, and on the FSN of specific vulnerable population <u>groups</u> and geographic regions, are also needed. Each country will have different data priorities, depending on their particular FSN context.</p>	<p><u>structural determinants</u> ADD “such as land tenure and market concentrations”</p> <p>After <u>people’s</u>, add: <u>and communities to produce, store, distribute, and access</u></p> <p>After <u>groups</u>, add: <u>especially displaced persons and those in areas experiencing war, conflict, and political sanctions</u></p>
<p>6. Several other constraints limit the effectiveness of data-informed policy action on FSN, especially in developing countries. Key among them is the low level of data literacy and analysis skills (for both qualitative and quantitative data) on the part of data and information producers and users at all levels – from data collectors and analysts, to decision-makers, and to the people, as rights holders and the ultimate beneficiaries of food security and nutrition policies. Developing countries need financial and technical <u>support</u> to strengthen their <u>capacities</u> to generate high-quality data, analyze it and use it to guide decision-making related to FSN.</p>	<p>Delete “support” ADD “abilities”</p> <p>The financial resources of countries in the global South are to be significantly increased through payments for loss and damage and debt relief. Especially with regard to the connection between food insecurity and debt (<u>link</u>).</p> <p>ADD after capacities: “to protect their data sovereignty and”</p>

<p>7. FSN data are often fragmented across different international agencies, government sectors, public and private institutions, and they may be collected or managed using different protocols, making them difficult to use. Therefore, it is a priority to strengthen national and international coordination efforts to define, promote and enforce the adoption of global FSN data (and associated metadata) standards, including a concerted effort to harmonize indicators, which will be <u>essential for comparison</u> and to obtain the full potential of data. Better coordination and harmonization can improve the quality and utility of FSN data and statistics, while creating synergies and avoiding duplication of efforts and confusion when communicating information. Harmonization is particularly relevant for FSN data and statistics that are used for global or regional analyses and <u>monitoring</u></p>	<p><u>essential for comparison</u> needs to be more clear: what elements are being compared? Compared to other regions and countries with different conditions? Better to change to: <u>essential for full assessment</u></p>
<p>8. The number of state and non-state actors that play a role in FSN data collection and use is growing exponentially. FSN data systems must be underpinned by clear principles, governing frameworks, and effective processes to ensure that FSN data is collected, used and shared in ways that are effective, inclusive, transparent, ethical, and equitable. The HLPE-FSN report 17 underscored our collective responsibility to ensure that people are at the heart of decisions about data. This means that people have a say in data design and collection that affect their lives and are included in decisions related to data use and re-use.</p>	<p>The design, collection, storage and use of data needs to guarantee human rights, including economic, social and cultural rights, including the rights of people over genetic resources and the rights of people over traditional knowledge in the protection of local resources..</p> <p>In addition it seems to be unclear what “people are at the heart of decisions about data” means. Instead we propose a clear reference to the CARE principles.</p>
<p>9. The complex array of public and private actors and institutions involved in FSN data, coupled with the rapidly changing data ecosystem <u>due to</u> the proliferation of the internet and mobile telephony, and the emergence of big data and advanced methods of data capture, storage, and analytics (including machine learning and Artificial Intelligence - AI), as well as the fast pace of technological innovations, brings to centre stage the need <u>for global coordination to improve data governance</u>. It is important to recognize the nature of FSN data and information as a public good <i>that is widely accessible, broadly circulated and used in the public interest</i>, while at the same time preserving the rights of the people to whom the data ultimately belong and taking steps to address imbalances in power among actors with respect to generating, accessing and using <u>data</u>. These urgent data governance issues are not</p>	<p>The role of public policy and governments in ensuring data governance is missing.</p> <p>Delete “taking steps to address” and ADD instead “significantly reduce”</p> <p>After <u>due to</u> add: <u>a market-oriented approach with high profits to the private sector and</u></p> <p>After <u>for</u>, add: <u>immediate and continuously updated</u></p> <p>After <u>governance</u>, add: <u>with the ultimate responsibility on governments that are accountable to their people</u></p> <p>After <u>data</u>, add: <u>Data shall not be sold or used for profit.</u></p> <p>Governance must include a full assessment of data: is it biased? Or incomplete?, does it re-empt more relevant data? Governance must ensure that data does not lead to the introduction of unnecessary knowledge on a territory (example of the use of fertilizers and pesticides</p>

<p>unique to FSN data, and efforts are already well underway towards building the foundations for a global framework for data governance that strikes the right balance between data access and sharing, on the one hand, and data protections and control, on the other. Such efforts can serve as guidance for developing national data governance frameworks, adapted to local contexts.</p>	<p>on rich quality soils).</p> <p>There is a need for global coordination to improve data governance.....the rights of the people (in particular those marginalized, living under occupation or in conflict zones)</p>
<p>10. These policy recommendations are addressed to Governments (relevant ministries, national, regional and local authorities and institutions), international organizations², international financial and FSN research institutions, private sector associations, philanthropies, and civil society organizations. They are voluntary and non-binding and aim to complement voluntary guidance from other CFS policy agreements</p> <p>²Throughout the document, international organizations refer primarily to the UN Rome-based Agencies and other inter-governmental organizations with a mandate related to food security and nutrition.</p>	<p>This paragraph should be deleted, as it undermines the role of the CFS. In addition it is unclear how these policy recommendations work together with other CFS products.</p>
	<p>At different places of the rationale, the zero draft mentions private actors as collectors, holders and users of FSN data. However, the rationale of these policy recommendations should be more explicit in acknowledging that corporate and other non-state actors are increasingly collecting data and using it for their economic interests, and that the data economy is increasingly dominated by a few large and powerful companies, with significant implications for the collection and use of FSN data. This issue should be addressed by these policy recommendations and should therefore be made explicit in the rationale. In addition the reference to the role of some countries and their governments supporting and protecting private companies and the exercise of monopolistic control is missing</p>
<p>RECOMMENDATIONS</p>	
<p>1. CREATE GREATER AWARENESS AND DEMAND FOR BETTER USE OF FSN DATA IN DECISION-MAKING</p>	<p>The descriptors 'greater' and 'better' are irrelevant. "Create awareness of the benefits, limits, and risks of the use of FSN data in decision-making, keeping in mind the ethical and environmental impacts of the processes and tools for data recollection?"</p>
<p>Governments are urged to:</p>	
<p>a) establish – or strengthen where it already exists - effective national multi-sectoral and multistakeholder FSN governing bodies responsible for guiding FSN policy and</p>	<p>To be reformulated to clarify that these policy recommendations do not suggest the creation of new governing bodies for FSN data</p>

<p>programme planning linked to national development planning, and for setting national priorities for FSN data production to inform these <u>policies</u>. Such bodies should have mechanisms to ensure that civil society and <u>vulnerable population groups</u> have an active and well-defined role in determining priorities</p>	<p>After <u>policies</u>, add: with the goal of food sovereignty After <u>vulnerable population groups</u>, Add : <u>especially those people living in conflict zones, under occupation or suffering from protracted crises</u> ADD after multistakeholder: “and decentralised” ADD after setting: “local, regional and”</p>
<p>b) promote and facilitate dialogues and cooperation among a broad range of relevant stakeholders at the national and sub-national levels, facilitated by the aforementioned multi-sectoral FSN governing bodies, in order to 1) discuss FSN data priorities, identifying what is already available and what are the most urgent needs; 2) stimulate analysis of existing data to produce information that is relevant for FSN policies and programmes.</p>	<p>This Paragraph should mention the assessment of governance frameworks related to the collection and use of FSN data as an additional task of FSN governing bodies, but rather invite governments to include issues related to the collection and use of FSN data into the mandate of existing FSN governing bodies, including to reiterate CFS recommendations to create such bodies where they do not exist.</p> <p>Assessment and Monitoring the impact of the digitalization on the food system regarding UNDROP and UNDRIP, based on the analysis of the structural conditions that would enhance FSN.</p> <p>ADD after data: “on the basis of free and informed consent (FPIC) in line with the FSN data”</p>
<p>c) conduct cost-benefit analyses - with the support of donors, international organizations and academia - to assist policymakers to estimate the trade-offs of making decisions using FSN data from varying sources. d) whenever data is used to inform FSN-related legislation and policy proposals, include detailed data annexes, presenting available data sources and the analytic tools to be used for their <u>treatment</u>.</p>	<p>This Paragraph should refer explicitly to the need of conducting risk assessments, both prior to the use of FSN data as well as evaluate the impacts and outcomes of such use after sources ADD minding ethical and environmental impacts of the processes and tools for data recollection Change trade-offs to risks and benefits ADD after treatment: , while accurately identifying the public interest they represent</p>
<p>e) promote the regular production and dissemination, by government units that collect FSN data, of succinct knowledge products that summarize the main findings resulting from government data collection initiatives in formats that facilitate the use and uptake of information by decision-makers.</p>	
<p>International organizations are called upon to:</p>	
<p>f) lay out good practices for FSN data priority setting guided by frameworks for data decision-making;</p>	
<p>g) develop practical guidelines on data-informed ex-ante and ex-post policy evaluation in the FSN domain for national-level policymakers and administrators.</p>	
<p>h) develop and promote, in collaboration with national and international training institutions,</p>	<p>This Paragraph should expand the target of training and capacity development beyond</p>

<p>and based on needs assessments, e-learning and continuing education courses about FSN data utilization and governance for policymakers to inform FSN policy and programme planning, including how to use the data for producing diagnostics and analysis to identify policy bottlenecks and priorities</p>	<p>policy makers. It is critical that all food systems actors increase their understanding of the benefits and risks of increased collection and use of FSN data. A particular emphasis should be put on vulnerable and marginalized groups, and capacity building should be made available in formats that are accessible and appropriate for them (which is not necessarily the case for e-learning).</p> <p>Add: develop and promote the collection and use of data from non-technological methods in ways that respect the knowledge of those who produce the data</p>
<p>2. INCREASE AND SUSTAIN INVESTMENT IN THE COLLECTION AND QUALITY ENHANCEMENT OF PRIORITY DATA FOR FSN, WHILE OPTIMIZING AND/OR REPURPOSING CURRENT DATA-RELATED INVESTMENTS</p>	<p>Ensure adequate public resources for the collection and use of FSN data to improve decision-making for the right to food and nutrition through International Cooperation (ODA)</p>
<p>Governments are urged to:</p>	
<p>a) increase and sustain investment in the production of timely, high quality, sufficiently disaggregated, reliable and consistent FSN data, with the support of international organizations and donors as needed, <u>on people’s ability to produce and access food, on their actual food consumption and diet, and on their nutritional status</u>, particularly of the most vulnerable groups (e.g. children, youth, women, elders, family farmers and small-scale food producers, indigenous peoples, <u>displaced people</u>), and other national priority data. Investments in FSN data should reflect a good balance between data for development and data for emergencies, <u>according</u> to national needs.</p>	<p>This Paragraph should be reworded in order to replace the phrase “increase and sustain investment” with more appropriate language in the context of CFS policy recommendations</p> <p>Delete “<u>on people’s ability to produce and access food, on their actual food consumption and diet, and on their nutritional status</u>, particularly of the most vulnerable groups (e.g. children, youth, women, elders, family farmers and small-scale food producers, indigenous peoples, displaced people), and other national priority data” and ADD: sufficiently representative of all sectors/spaces or production areas, disaggregated, reliable and consistent data on the FSN, specifically on the capacity of people, especially the most vulnerable groups (children, youth, women, the elderly, family farmers, small-scale food producers, indigenous peoples, internally displaced persons, etc.)</p> <p>Add after displaced people: and people living in areas where conflicts are prevalent, are under occupation or suffering from protracted crises.</p> <p>Add after according: “to local, regional and”</p>
<p>b) elaborate national plans to define priorities for FSN data collection and analysis and to improve and optimize existing national data systems for FSN, <u>guided by the aforementioned multi-stakeholder FSN governance bodies</u>, dialogue processes and cost-benefit analyses. Governments that require assistance in implementing these plans should be supported</p>	<p>this Paragraph should explicitly refer to the realization of the right to food and nutrition to guide the setting of priorities, and underline that governments need to ensure that their priorities are consistent with human rights.</p> <p>Delete: <u>guided by the aforementioned multi-stakeholder FSN governance bodies</u></p>

<p>both technically and financially by international organizations and <u>donors</u>, and their plans should be aligned with international standards, while preserving country ownership</p>	<p>After donors, add: with safeguards against imbalance of power and without prerequisites</p>
<p>c) regularly review existing national data-collection systems relevant for FSN with the aim of identifying <u>opportunities</u> to streamline and modernize them, and enhance their efficiency and relevance, according to international standards.</p>	<p>This paragraph should clarify that such reviews should be part of the FSN governing bodies mentioned in recommendation 1, and that the focus of the assessments needs to be on the improvement of FSN decision-making to realize the right to food and nutrition.</p> <p>after opportunities ADD “and risks”</p>
<p>International organizations are called upon to:</p>	
<p>d) form an <u>inclusive task team of UN agencies and other stakeholders</u>, under FAO and WHO leadership, responsible for producing guidelines outlining a minimum set of core FSN data that countries should strive to collect, with respective recommended methodologies and indicators to be produced.</p>	<p>this Paragraph should mention the importance of the autonomous participation of organizations of small-scale food producers and Indigenous Peoples in such processes.</p> <p>after inclusive ADD: “and then decentralised”</p> <p>Delete: <u>and other stakeholders</u></p>
<p>International organizations and academic research institutions are urged to</p>	
<p>e) continue and accelerate innovation in the areas of statistics, data science and survey-based research to address FSN questions;</p>	<p>this paragraph should refer to the realization of the right to food and nutrition as the core objective to guide innovation, thus clarifying that innovation is not an end in itself.</p> <p>after data science ADD “including social science”</p>
<p>International organizations, donors, governments and philanthropies are urged to:</p>	
<p>f) increase and sustain the amount of resources that are allocated to improve FSN data collection, <u>quality</u> enhancement, analysis, dissemination and use to improve the effectiveness of FSN-relevant policies, leveraging existing financing mechanisms and assessing and re-purposing existing funding as needed. In line with a recent pledge for increased investments in data financing³, donors should aim at allocating a minimum of 0.8% of their development investment to data, with a dedicated share allocated to FSN data. Investments in FSN data must reflect a good balance between data for development as well as data <u>for</u> emergencies, according to national needs.</p> <p>³ One recent pledges is the Data for Purpose campaign: https://datawithpurpose.org. See: https://static1.squarespace.com/static/62669c6628ceed259712c4dd/t/632bc074fbb93c5c571ba8e3/1663811700575/Investment+case_Multiplying+progress+through+data+ecosystems_vFINAL.pdf</p>	<p>We have concerns/questions regarding the allocation of a share of states’ development budget to data mentioned in recommendation. As mentioned several times already, the realization of the right to food and nutrition should be mentioned as the primary objective of the collection and use of FSN data, and therefore also inform budget decisions.</p> <p>After <u>quality</u>, add: and <u>assessment</u></p> <p>After <u>for</u>, add: <u>situations of crises and</u></p>

<p>g) improve coordination of investments aimed at supporting FSN data in order to avoid duplication of efforts, improve efficiency, and maximize synergies.</p>	<p>this Paragraph does not make clear statements who will coordinate and invest. There is an urgent need to clear that Questions and state that it should remain under public domain.</p>
<p>h) consider establishing a Global FSN Data Trust Fund, to which governments of eligible countries and other stakeholders (including, for example, communities and organizations of Indigenous Peoples) can apply to obtain financial support to generate and benefit from FSN data.⁴ At the same time, continue to support existing FSN data collection funding initiatives, with a vision that such initiatives might be integrated into the Global FSN Data Trust Fund.</p> <p>⁴ Financial support from the Global Trust Fund could be used, for example, to establish FSN data plans, conduct FSN assessment surveys for specific communities, create and own data dissemination platforms, among other non-profit-oriented activities.</p>	<p>We have many questions about the Trust Fund proposed in the recommendations. How would it operate? How would it be governed? By which organizations? Would it be operating under the control of the CFS? And how would it collect and share data? And on what basis would it decide about the eligibility of countries to receive support from the fund? Due to extreme concerns regarding the allocation of funds and the conditions that could be required, including political and economic conditions, we strongly reject the idea of a Trust Fund.</p>
<p>International organizations, governments, civil society, academia, and the private sector are urged to:</p>	
<p>i) increase the collection, quality enhancement, analysis, and use of multiple forms of FSN data, beyond quantitative and machine-readable data, such as qualitative data. This implies valuing and applying multiple approaches to information collection, including participatory, qualitative methodologies that are already used by communities, including indigenous communities.</p>	<p>The Paragraph should refer explicitly to quantitative and qualitative data produced, collected and owned by small-scale food producers and Indigenous Peoples, as well as food workers and other marginalized groups, emphasizing the need to protect the rights of these groups, including the rights over this data and human rights more generally. In the case of Indigenous Peoples and small-scale food producers, this included particularly their rights over their knowledge, practices and innovations. In addition, the right to refuse access to such Data should be stressed as well.</p>
<p>3. INVEST IN HUMAN CAPITAL AND IN THE NEEDED INFRASTRUCTURES AND TECHNOLOGIES TO ENSURE THE SUSTAINABILITY OF DATA PRODUCTION CYCLE AND ANALYTIC CAPACITY</p>	<p>We suggest the title: “Develop the capacities and ensure public interest control over data infrastructure and technologies needed for the collection and use of FSN data for decision-making”</p>
<p>Governments are encouraged to:</p>	
<p>a) modernize national statistics system infrastructures in order to establish comprehensive, coordinated FSN data systems and to sustain the collection and quality of disaggregated and detailed data over time, with technical and financial assistance from</p>	<p>Put in place adequate statistics systems (including capacity development), while guaranteeing human rights. ensure that public data collection and analysis systems and infrastructure are placed under public interest control.</p>

<p>international organizations and donors as needed.</p>	<p>ensure that FSN data held by corporations, which has social/public good functions to advance the realization of the right to food and nutrition, is made available for public interest use, particularly in those cases where corporate data holders have not produced/generated the data, but merely collected and aggregated it.</p> <p>Delete “donors” instead ODA</p>
<p>international organizations and donors as needed.</p>	
<p>b) hire and invest in building the capacities of statisticians, data scientists and experts in the analysis and interpretation of quantitative and qualitative FSN data to work in relevant <u>ministries</u> and national statistic offices; and incubate analytical units within relevant ministries.</p>	<p>ADD after ministries: “and local and regional”</p>
<p>c) expand training opportunities for staff in national statistics offices and other government units engaged in FSN data analysis, with support from international organizations as needed, to enhance their analytic competencies, including use of open-source software;</p>	<p>after units ADD and “civil society” After “in” ADD: “local, regional and”</p>
<p>d) create targeted scholarship programmes to allow young people, especially women, to study in scientific programmes related to FSN that have a strong data focus (quantitative and qualitative), as well as data science and statistics.</p>	
<p>Governments, international organizations, donors, private sector; civil society; and academic research institutions are urged to:</p>	
<p>e) invest in further refinement, validation and application of cost-saving data collection approaches, such as integrated survey programmes, remote sensing, natural resource scanning by drones and digital data collection tools. Tools and technology that streamline and simplify data collection while improving data quality (computer-assisted data collection tools) should be used and promoted at all levels, within the context of adequate data governance and proper regulation of the use of the data collected.</p>	<p>This paragraph should be removed or should emphasize the need for participatory assessments to identify the most adequate data collection and use tools to advance the realization of the right to food and nutrition in a given context, including the socio-cultural context.</p> <p>The tools mentioned (remote sensing, drones and digital data collection tools) risk enabling more private interest control over FSN data (given that those technologies are largely in the hands of private corporations) and undermining the rights and knowledge systems of Indigenous Peoples, small-scale food producers and other marginalized groups.</p>
<p>Governments, international organizations and academic research institutions are urged to:</p>	

<p>f) improve existing analytic models and develop new ones to be employed in various areas of relevance for FSN decision-making. Especially relevant are validated model-based approaches to forecast future values of FSN determinants and outcomes. Such models should be transparent, with good quality training data, and flexibly implemented so that they can generate predictions under clear, alternative scenarios.</p>	<p>Analytic models need to be developed and assessed through participatory processes, in particularly ensuring the participation of Indigenous Peoples, small-scale food producers, agricultural workers, marginalized people and communities as well as consumers. Start with: <u>Based on participatory assessment</u>, improve existing analytic models and develop new ones</p>
<p>g) develop, in collaboration with national and international training institutions, e-learning materials that focus on FSN data collection, quality control, analysis, interpretation and communication of results for specific types of FSN data and methodologies; materials should promote an integrated understanding of the relationship between the different types of data and resulting indicators – i.e. a systems perspective.</p>	<p>More broadly, Digital gap is a reality, the Right to information and communication should be acknowledged as a priority to ensure the guarantee of rights such as social protection, access to health, financing and technical assistance, as well as avoiding disasters and emergencies".</p>
<p>h) eliminate language barriers by expanding the set of languages in which FSN e-learning courses and relevant FSN data platforms and analysis tools are offered.</p>	<p>Add: <u>with safeguards to ensure that AI generated translations are accurate and reflect the intent and meaning of the original language</u></p>
<p>i) establish criteria for assessing the quality of e-learning materials for FSN statistics and data science and create a framework providing objective quality assessment and ranking of existing, open-access, on-line learning opportunities, to identify the best, up-to-date courses and draw attention where quality improvement is needed.</p>	<p>This Paragraph should put more emphasis to recognize and address the inequities of access to technology</p>
<p>International organizations are urged to:</p>	
<p>j) support the often relatively scarce local capacities by making all efforts to work closely with professionals from national public institutions whenever the need exists to collect and analyse FSN data at national and subnational levels.</p>	
<p>4. INCREASE COLLABORATION AMONG ALL PARTIES TO HARMONIZE METHODS, IMPROVE FSN DATA QUALITY, AND PROMOTE THE SHARING OF FSN DATA FOR THE PUBLIC GOOD</p>	
<p>Governments and international organizations are called upon to:</p>	
<p>a) form a joint commission, with the inclusive collaboration of relevant sectors and stakeholders, to promote the standardization, coherence, and interoperability of FSN data and data platforms, aimed at harmonizing methods and indicators, and facilitating the sharing of FSN data while always respecting</p>	<p>Whereas harmonization of methods and indicators can be useful for certain purposes, this recommendation should acknowledge that food systems and economic, social, cultural and environmental contexts are different. Taking into account such differences it is critical to ensure that the collection and use of data serves improved decision-making to realize the right to</p>

<p>data privacy and Free Prior and Informed Consent.</p>	<p>food and nutrition. Harmonization and standardization should in no way invisibilize and/or further marginalize critical food systems actors, such as Indigenous Peoples, small-scale food producers, food workers, marginalized communities etc., thus jeopardizing their human rights.</p> <p>“to promote the standardization, coherence, and interoperability of FSN data and data platforms” ADD: <u>while considering the social, cultural, environmental and economic specificities of each context</u></p>
<p>b) advocate for the inclusion of FSN data as a statistical domain inside the UN Statistical Commission, in which the standardization of methods and concepts can be discussed in an intergovernmental setting.</p>	
<p>c) publicly disseminate macro, micro and metadata that is relevant to FSN, in order to increase access for policy and research purposes, respecting confidentiality and data privacy, based on the Fundamental Principles of Official Statistics⁵ and the Principles Governing International Statistical Activities⁶, and in conformity with national laws and regulations.</p> <p>5 https://unstats.un.org/unsd/dnss/gp/FP-Rev2013-E.pdf General Assembly resolution (A/RES/68/261), adopted on 29 January 2014</p> <p>6 https://unstats.un.org/unsd/acsub/2013docs-22nd/SA-2013-8-FP-UNSD.pdf</p> <p>7 United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas</p> <p>8 United Nations Declaration on the Rights of Indigenous Peoples 9 https://unstats.un.org/unsd/statcom/53rd-session/documents/2022-41-FinalReport-E.pdf (Decision 53/126)</p>	
<p>d) promote the use and integration of FSN data from multiple sources (including private sector and data produced by communities and civil society organizations) and multiple sectors (e.g. food, agriculture, health, nutrition, social development, environment, budget and planning, etc.) related to FSN.</p>	<p>This paragraph states that advancing the right to food and nutrition may require the use of data from multiple sources, but it should acknowledge better that the use of such data needs to be regulated through human rights-based governance frameworks. In this context, it is particularly important to ensure that making available public FSN data does not lead to further power imbalances in food systems, and to avoid accumulation of public data by corporate actors who have the biggest processing capacity and could further cement their dominance over food systems.</p>

	instead of related to FSN: <u>regulated through human rights-based governance frameworks.</u>
e) increase collaboration on sharing of data on international trade of food and agricultural products, and on trade policies , including through strengthening of instruments such as the Agricultural Market Information System (AMIS).	Add: <u>data generated by UNCTAD and ILO on the living conditions of workers, the poor and small-scale food producers</u> Add: <u>and the impacts of trade policies on local, territorial production with implications on food security and nutrition</u>
International organizations responsible for producing key FSN data are called upon to:	
f) coordinate the release of datasets and knowledge products , avoiding the publication of competing datasets and reports on important FSN domains (such as food commodity balances, food prices and market prospects, and food security assessments).	This paragraph opens the door for censorship for the collection and analysis of alternative or critical data to the dominant narrative. For this reason the paragraph is unacceptable and we want to delete it.
5. ESTABLISH OR STRENGTHEN FSN DATA GOVERNANCE AT GLOBAL, REGIONAL, NATIONAL AND SUB-NATIONAL LEVELS	
Governments are urged to:	
a) establish, in collaboration with all stakeholders involved, a national FSN data governance system with a regulatory framework, that: 1) is anchored in the Universal Declaration of Human Rights and consistent with UNDROP7 and UNDRIP8; 2) respects the rights/principles of: ethics in the production and use of data; transparency and accountability; privacy; protection of personal data; quality and integrity; participation; freedom of expression; and informational self-determination; 3) promotes open data while at the same time protecting data privacy and promoting fairness, inclusion and equitable distribution of benefits when it comes to the collection, processing, dissemination, use and management of FSN data; and 4) is informed by emerging international data governance frameworks.	The specific reference to UNDRIP and UNDROP is of particularly critical importance in this regard and should be maintained. The reference to informational self-determination (recommendation 5a)) is very positive. However, in addition to stressing the need for the protection of privacy, the recommendations should emphasize the importance of considering small-scale food producers, Indigenous Peoples, food workers, communities and consumers as FSN data producers who hold primary economic rights over the data they produce, and should be entitled to decide what data to share, with whom and under what circumstances, including the right not to share their data. The paragraph is missing a clear reference to the prohibition of patenting/privatising the information contained in the collected data. And a clear reference to the right to refuse to participate in the collection and/or use of data from automated or uninformed systems
b) treat agriculture and FSN data as a public good and “open by default” , as recently endorsed by the UN Statistical Commission, ⁹ to increase the availability of FSN data, address data gaps in national and international systems, and to support efforts to monitor achievement of the Sustainable Development Goals.	The policy recommendations should propose steps to foster the understanding of knowledge as a common good, while emphasizing the specific rights of Indigenous Peoples and small-scale food producers in this regard (see above). In this context, the recommendation should also emphasize the need for regulatory frameworks to guarantee that infrastructure needed for FSN data is placed under public interest control.

	<p>We reject the idea of open data in an environment shaped by enormous power asymmetries. Open data is not resource neutral, a subsidy for big tech companies, does not respect indigenous people’s rights and does not protect the interest of peasants. Instead, we suggest to explore ways of data governance that sees data as commons, which is in line with the CARE principles.</p> <p>Delete: and “open by default”, as recently endorsed by the UN Statistical Commission,⁹</p> <p>“ treat agriculture and FSN data as a public good” Add: <u>that can be analysed and used only under a strict governance body ensuring the respected of FPIC principles</u></p>
Governments, international organizations, research institutions, civil society and the private sector are called upon to:	
c) ensure that FSN data comply with existing open-access principles for data and analysis tools (such as FAIR principles - findable, accessible, interoperable and reusable ¹⁰), ensuring access to and reproducibility of relevant research results, while at the same time protecting data privacy and promoting fairness, inclusion and equitable distribution of benefits when it comes to the collection, processing, dissemination, use and management of FSN data; continually adapt to enhance data access, as open-access principles and guidance evolve.	We reject the idea of open data in an environment shaped by enormous power asymmetries. Open data is not resource neutral, a subsidy for big tech companies, does not respect indigenous people’s rights and does not protect the interest of peasants. Instead, we suggest to explore ways of data governance that sees data as commons, which is in line with the CARE principles.
d) explore the adoption of the principles of inclusivity, equity, non-discrimination and participation , freedom of expression, and self-determination of data (such as the CARE principles – collective benefit, authority to control, responsibility, ethics ¹¹) and how to apply them to FSN data.	After inclusivity ADD: “consent, ethics, fairness,”
e) explore ways to improve legal frameworks that protect sensitive FSN data and privacy , developing accountability systems for their implementation.	
International organizations are called upon to:	
f) ensure that governance of their own FSN data complies with emerging international data governance frameworks.	
The private sector is urged to:	
g) share FSN data and analytics with the public sector for policy and research purposes , exploring mechanisms such as data trusts to make their FSN data more promptly and widely available.	The recommendation should call upon states to put in place regulatory frameworks to determine what privately-held FSN data has social/public good functions and must therefore be made available in order for the public interest and to

	advance the realization of the right to food and nutrition
	A specific recommendation should be added regarding the need for establishing regulatory frameworks to conduct risk assessments and monitoring of the collection and use of FSN, particularly in the case of new(er) technologies. Such risk assessments should be independent and participatory (avoiding conflicts of interest and putting special emphasis on the adequate participation of Indigenous Peoples, small-scale food producers, food workers and other marginalized people and communities), and their results be made public and inform measures to prevent, cease and remedy any harm resulting from the collection and use of FSN data. Given that an increasing use of digital data collection, processing, storage and use creates an increased need of raw materials and other natural resources as well as energy, the related socio-environmental impacts should be taken into account when conducting risk assessments.
	The recommendation should remind states of their obligation to put in place adequate frameworks and legal recognition to protect and enable the development of traditional knowledge, practices and innovations of Indigenous Peoples, peasants and other people working in rural areas, as recognized by international law. Such frameworks should take into account the fact that these are embedded in knowledge and innovation systems, which require specific protection.
	The recommendation should specify that FSN data governance should include regulations ensuring corporate accountability for any negative impacts deriving from collection and use of FSN data by corporations.
	The recommendation should contain specific reference to states' responsibility to put in place regulatory frameworks ensuring that public data and the benefits generated from it are not privately accumulated.
PROMOTION, IMPLEMENTATION, MONITORING and EVALUATION	
In accordance with the voluntary nature of these policy recommendations, Member States have the primary responsibility for their promotion, implementation, monitoring and evaluation.	

<p>Development partners, specialized agencies and programmes of the United Nations, international financial institutions, academic research institutes, private sector, philanthropies and civil society organizations are encouraged to support efforts by Member States to implement these policy recommendations, including through South-South and Triangular cooperation.</p>	