

GPSDD Comments on CFS Policy Guideline Draft

There are three areas where more specificity or precision would improve the draft recommendations and address CFS member concerns:

- 1) National-level coordination around data priorities**
- 2) Data Financing**
- 3) Data Governance**

Recommendation 1

The focus on multi-stakeholder coordination and cooperation at national level is reflected well in the draft. However, para 1b) could do more to emphasize the role of donors. As the HLPE report notes, the often fragmented and duplicative nature of donor support and interventions leads to wasted resources and persistent data gaps and challenges at national level.

It would be valuable to emphasize that donors should build on existing initiatives that support the capacity of national data and statistics systems and align data investments with priorities identified in national FSN policy and planning processes. This will reduce fragmentation and duplication of their support at the country level and increase the effectiveness of their investments.

Recommendation 2

The OEWG meetings made it clear that there is skepticism amongst members in establishing a Data Trust Fund as a new and additional financing mechanism. In our view, the policy recommendations should support recommendations to increase financing for national data systems and critically assess the possibility of leveraging existing funding mechanisms *before* recommending the establishment of a new Data Trust Fund.

The recommendation could propose that clear steps should be taken to identify and support existing country-based FSN data collection and use initiatives and direct funding toward them. Examples of such initiatives include: 50x2030 Initiative to Close the Agricultural Data Gap, The Global Strategy to improve Agricultural and Rural Statistics (GSARS), supported by FAO, Paris21 and UNECA, which builds on 50x2030 by supporting eligible countries in carrying out their agricultural censuses and developing their national agricultural statistical systems.

We are very pleased to see the recommendation for donors to allocate a minimum of 0.8% of their development investment to data, with a dedicated share to FSN data. To complement this, para 2a could include the recommendation that lower-income (IDA-eligible) countries allocate a minimum of 0.5%, and middle income (IBRD-only eligible) countries 0.1%, of annual expenditure to data, with a dedicated share to FSN data.

Recommendation 3

Several CFS members have expressed concern that topics related to data governance fall outside of CFS' mandate during the OEWG meetings. Nevertheless, FSN data systems need to be underpinned by clear principles and governing frameworks. One way of approaching this tension would be to recommend that FAO lead a specific process or forum, outside of CFS, to develop and agree common data governance principles. Such a process would need to be multi-stakeholder in nature, bringing in governments, the private sector, civil society, international organizations and other relevant groups.

A recommendation like this from the CFS to establish an inclusive process to develop common data principles could be a good starting point for the governance discussion, and lay a foundation on which to build trust for data sharing and use. In addition, calling for the development of a strategy and a roadmap for translating those principles into practice at a later stage would be a significant outcome of the document.

The rationale section offers a key entry point for the recommendations on data governance. Paragraphs 8 and 9 effectively set up the need for global data governance frameworks. However, it stops short of explicitly pointing to the need for common data governance principles *in the FSN sector*. The [WHO Data Principles](#) offer a valuable analogy and help make clear why such principles are needed at a sector level. **The principles are interesting to CFS members because they are multilaterally agreed upon language.**

FAO is well placed to be entrusted with this role and empowered to conduct a multi-stakeholder process to set out common data governance principles. This could build on efforts already underway at FAO and involve applying international standards and developing policies and agreements to facilitate the production, management, sharing, and use of data within and among organizations in the FSN sector.