

New Zealand Comments on the Draft CFS Policy Recommendations on Strengthening FSN Data Collection and Analysis Tools for Food Security and Nutrition

Thank you for the opportunity to comment on the zero draft dated 14 March 2023. New Zealand is pleased to see that this draft has picked up on a number of the comments and issues raised on the earlier draft.

Some overall comments:

- Reiterating comments made on the earlier draft, we think it is essential that these policy recommendations are actionable and useful. While the current draft has certainly narrowed its scope there are still a number of recommendations that are broad and not unique to food security and nutrition data. For NZ the issue of data governance is not unique to CFS and FSN data should fall under a broader UN data governance umbrella rather than creating the need for a separate negotiated FSN data governance structure.
- To be most useful the recommendations should provide some simple, tangible, easy to adopt recommendations for countries to improve their collection and use of FSN data. Building on existing structures for data collection and working with the essential data to collect. There is a real risk of more data being collected with limited ability to really inform decision making.
- There is a focus on the analysis of data to inform decision making but as important, if not more important, is the collection of data. Decisions on what data to collect and how that is collected to be most useful.
- Establishing new structures may not be the most cost effective way to progress greater awareness and demand for FSN data. Embedding processes into existing data collection systems would help include FSN data collection as part of a bigger suite a of critical data collection.
- Developing a framework that countries could use to either establish or improve and/or better use their relevant data collections to inform decisions about FSN could be a helpful process. Different countries would be at different stages but having a framework that provided the key questions to ask and follow up actions at different stages of FSN data collection and use. This could be a practical and helpful tool.
- Being clear what policy question is being asked is critical to designing the most appropriate data collection and analysis and will help identify useful data sets that my already exist as well as rule out collecting data that is not addressing the question/s.

- To ensure that the data collection has longevity it must be not so ambitious that countries cannot afford, or do not see value in the level of financial commitment, to keep collecting the data on a regular basis.
- There needs to be a balance about the level of disaggregation of data, the quality and cost of the data and the ability to inform decision making. Again it comes back to the critical policy questions that are being asked and what policy options are needing to be informed by the data. It is better to start with good quality data that can inform at a macro level before stepping up with data sets that can inform more micro level decisions and actions. Data collections are often built on and not set up as the “gold standard” at the outset.
- It is noted that under recommendation 2 a) the recommendation reads

Increase and sustain investment in the production of timely high quality data, sufficiently disaggregated, reliable and consistent FSN data, with support of international organisations and donors as needed, on people’s ability to produce and access food, on their actual food consumption and diet, and on their nutritional status, particularly for the most vulnerable groups (e.g. children, youth, women, elders, family farmers and small scale food producers, indigenous peoples, displaced people).

While this is a laudable ambition it is well beyond the ability and affordability of the most prosperous countries. Collection of data of individual food intake and nutritional status is high cost at a population level let alone sub-populations. This is not a realistic expectation for global guidelines where for many countries basic FSN data collection does not exist.

- A critical element that is not well captured in the draft document is the need to have an evaluation of both the data being collected as well as evaluation of how the data is being used to inform decision making.
- In terms of section 5 “establish or strengthen FSN data governance at global, regional, national and sub-national levels” New Zealand strongly believes that FSN data governance should sit within a broader data governance structure at all levels. We are concerned that if CFS attempts to address data governance structures in these guidelines we will never finish the task.
- We reiterate that it is important that CFS works within its mandate and that recommendations avoid duplication of efforts at the national, regional and international level.

We look forward to participating in the negotiations of these recommendations.

