

## **India's comments on the Zero Draft of the policy recommendations on Reducing Inequalities for Food Security and Nutrition**

### **A. General Comments**

In continuation of India's oral comments made in the informal OEWG meeting held on 12 April, India would make the following comments with regard to the zero draft.

a) India commends the CFS Secretariat and compliments the Rapporteur Ms. Lara Lobo of Brazil for their excellent efforts in bringing out a well-structured, and consolidated Zero Draft of CFS policy recommendations on reducing inequalities for food security and nutrition.

b) Notwithstanding the fact that these recommendations are voluntary and non-binding in nature, since the endeavour is to reduce inequalities, perhaps it would be worthwhile to analyse the financial implications of implementation of these recommendations to the member countries and make few concrete recommendations in this regard.

c) While member countries are committed to achieve SDG Targets by 2030, the recent reviews and reports establish that the progress achieved in implementation of SDG Targets is way off the track, and there is a strong probability that the world may miss on several SDGs targets especially the SDGs 1, 2 and 10. Given this scenario, it would be useful to make an objective analysis as to how the issuance of these ambitious recommendations at this stage could help improve the progress of SDGs.

d) Considering that a good number of recommendations require adequate time and resources both for implementation and for visualising impact at the ground level, it would be practical to phase them into immediate, mid term and long term deliverables. This will enhance the acceptability of the countries.

e) Some of the recommendations prima facie appear to go far beyond the mandate of CFS.

f) The scope of some of these CFS policy recommendations is much wider vis-a-vis the recommendations of the HLPE-FSN in their Report. For example on the issue of agricultural subsidies, the draft CFS recommendations go much beyond the contours of recommendations of Report of HLPE-FSN. Therefore, it is essential that the recommendations align with the Report of HLPE-FSN on Reducing inequalities for food security and nutrition in letter and spirit.

g) India is also mindful that some of the elements/recommendations of these CFS policy recommendations may not garner universal acceptance of member countries, and hence there is need for wider consultation and negotiations.

### **B. Specific comments.**

a) Para-1 of the CFS recommendations concerning tenure rights and access may be split into separate recommendations for more clarity. While both tenure rights and access are linked, essentially they are also different.

b) Para-4 concerning fostering public procurement programs for public institutions, food assistance and school feeding and implement policies that prioritize family farmers and smallholders may be split into two separate recommendations.

c) An express recommendation may be included that would encourage governments to prioritise procurement from the smallholders and family farmers while making public procurements.

d) Issues like labour rights are best addressed by ILO, a dedicated UN Agency specialised in these aspects and not through CFS. Therefore, para-8 concerning inclusive value chains may be suitably reviewed.

e) Some of the recommendations in the section concerning TACKLE INEQUALITIES IN RELATED SYSTEMS appear to be much beyond the scope of CFS. The issues like promoting access to decent work for all in agriculture and food systems, trade, investment and debt governance related to food security and nutrition, equity focus into trade, investment and debt governance related to food security and nutrition, national debt etc. requires further elaboration and deliberations for better understanding. The issues concerning negotiation of multilateral trade and investment agreements, rules-based multilateral trading system are best handled by and within World Trade Organization being a specialised organisation, and as such India sees no relevance for CFS making policy recommendations on this matter.

Similarly on the issue of decreasing agricultural subsidies which negatively affect production, food prices, nutrition, trade and environment, the CFS policy recommendations are not in sync with the recommendations of Report of HLPE-FSN. For developing countries and LDCs agriculture subsidies are an important tool for addressing food insecurity and malnutrition, and addressing poverty and securing livelihoods. Further, India views that the issue of agricultural subsidies are best addressed in WTO and not CFS. Hence, India views that before these provisions are included there is need for further deliberations and negotiations to better understand the merits of their inclusion.