

INTPA/F.3 input to CFS request for priority issues on ‘reducing Inequalities for FSN’

The present note elaborates on 4 key overarching / cross cutting points and 8 specific areas that may be considered as **policy priorities** for the EU:

Overarching/cross cutting Points:

- 1. Maintaining the balance between a focus on food systems and inequalities / drivers beyond food systems (that are not only different but also have a bearing on food systems).**

When considering drivers of inequalities affecting FSN outcomes, there must be a **balanced focus on structural inequalities and their systemic drivers both within and outside food systems**. While overlapping, the focus of food systems policy is much narrower than FSN policy more generally. It should equally be recognised that many of **the most powerful drivers of such inequalities within food systems** (including the financialisation of food; and the unequal distribution of resources such as land, seeds and water, unequal power dynamics between large food corporations and smaller food producers; market concentration; non-existent or inadequate social protection for the billions of people unable to afford a healthy diet etc.) **are in turn reflecting, linked to and driven by inequalities that lie beyond food systems**. These include continually widening income and wealth inequalities more generally and the resulting intensification of poverty; unfair systems of international finance, debt and trade; migration, governance and the rule of law, decent work deficits, the general trend of shifting control of resources from national governments to the private sector etc.

- 2. Ensure continued emphasis on a rights-based approach.**

Recognition of this situation is fundamental to understanding that **a narrow focus within the food system may not be likely to bring about the bold structural, systemic and transformational changes** (as referred to in section 6.1 of the report) required to reverse the alarming FSN trends currently facing the world. Indeed, such recognition confirms the widely accepted indivisibility of human rights. For the EU, core principles of international partnership for FSN include ensuring a multi-sectoral, rights based, gender transformative and government led / country-based approach. Furthermore, it is necessary to challenge assumptions that the solutions for addressing food insecurity and malnutrition amongst those involved in agriculture, particularly subsistence farmers, lie solely in the food system. A comprehensive perspective is required to ensure the most effective and appropriate solutions are sought from across the sectors.

- 3. In the spirit of SDG 10.1 avoid its translation into a narrow approach of targeting services and resources to the bottom 40% of the population. Crucially the focus should include transformational, systemic and structural policy shifts that will also bring about real change in the incomes, reduce vulnerability and FSN of the bottom 40% (i.e. ensure an outcome focus)**

It is important that the **logic underpinning SDG 10.1 is not conflated with a narrow approach consisting of targeting specific programmes and resource transfers to the bottom 40% of the population**. In fact, counter intuitive as it may sound, such an approach may even run counter to the explicit outcome focus of the SDG 10.1

inequalities target (i.e. sustained income growth of the bottom 40% at a rate higher than the national average). Note this is basically the same message to emerge from the EU's policy shift in tackling gender inequalities in so far as simply providing programmes, services and resources to women is often counterproductive / inadequate to bring about the transformational shifts required for sustained reduction in gender inequalities. Similarly, whilst it is important that social protection mechanisms include the poorest of the poor, only targeting this group especially in high-poverty contexts, can undermine a human-rights based approach to social protection (which posits that everyone should be covered against risks and contingencies across the life cycle, when needed). Moreover, for a better measurement the EU advocates for the use of Distributional Impact Assessments and hence both, the Equity Tool and Commitment to Equity tool.

4. **Recognise the challenge of generating recommendations with real added value given both the need for context specificity but also given the political sensitivity of many issues and the temptation to simply rephrase the problem as a recommendation without going further in terms of the 'how'.**

Another overarching point can be made regarding the **tendency for certain recommendations to end up rather general and vague** – for example regarding land inequalities the recommendation includes ‘monitor and limit concentration’ as well as to the need for efforts ‘protecting the vulnerable and preventing the concentration of resources’ without elaborating on how this might be achieved. It is questionable as to how constructive such recommendations are given current realities, power asymmetries / influences and resulting risks of policy inertia. Attention to context specificity matters and it may be argued makes precise recommendations challenging – however this should not be used as an excuse for lack of clarity and added value.

Priority issues:

1. **Equitable access to resources.**
2. The importance of **agroecology** (currently mentioned only once in passing in Section 6) to advance equality across food systems, while increasing availability for healthy and sustainable diets.
3. Reference / attention to **healthy and sustainable diets** (and the urgency of addressing adequacy of supply of fruit and vegetables and their non affordability by the majority of the population in so many LMICs).
4. **Universal social protection** - as a priority for the immediate realisation of the right to food and access to healthy diets.
5. **Regulation of aggressive marketing of ultra-processed / unhealthy food** (not currently referenced in Section 6).
6. Addressing **indebtedness and shrinking fiscal** space thereby eroding state's ability to ensure human rights.
7. **Risks associated with multi-stakeholder dynamics** in the context of evolving governance models given existing power asymmetries.
8. **Data and indicators** - within FSN these have tended to be inequality blind - this needs to change.

Detailed comments on priority issues with references to the final HLPE Report on “Reducing inequalities for food security and nutrition”:

Regarding Section 6.1 on principles:

- In section 6.1 of the report, it is stated (Principle C) that ‘FSN policies and programmes should be grounded in a rights-based approach, **informed** by existing human rights instruments focused on the right to food and other interdependent rights’. Note: while the UDHRs is not a legally binding instrument, ‘international human rights law lays down obligations which **States are bound to respect**. By becoming parties to international treaties, **States assume obligations and duties under international law to respect, to protect and to fulfil human rights.**’ (<https://www.ohchr.org/en/instruments-and-mechanisms/international-human-rights-law>)
- Principle H states that ‘All stakeholders – government, international organizations, civil society and the private sector – are responsible for reducing inequalities in food systems. Each has a role to play, individually and collaboratively, with due consideration given to conflicts of interest’. However, it is suggested to add that in specific contexts careful scrutiny and management of multi-stakeholder dynamics in line with a rights-based approach may be required - especially bearing in mind the existing inequalities in power, resources, capacities, voice of various stakeholders from the outset of engagement.

Tackling inequalities within food systems:

- 6.2 A.1 Resource related inequalities (including the challenge of growing land concentration and land grabbing). Note here the **recommendations could be much clearer and less vague**. With respect to corporate land acquisition and the resulting concentration of ownership and control across food systems, the policy recommendations include to ‘monitor and limit concentration’ and ‘protecting the vulnerable and preventing the concentration of resources’. Such recommendations are unlikely to add much value in terms of how this can be achieved given the existing power inequalities and resulting policy inertia. As noted in our previous comments on the draft report last year: *‘It would be important to bear in mind and refer to the conclusions of reports such as the 2020 ILC / Oxfam report which identifies worsening trends including ‘tackling land inequality is a fundamental part of dismantling other social and environmental ills....to do this will require pushing back against the economic model of resource commodification and yield maximization, and embracing the culture and rights of women, Indigenous peoples, and small farmers’ ‘The researchers also cited increased corporate and financial sector investments in food and agriculture, and the weakness of existing institutions and mechanisms to resist growing land concentration, as other reasons for why land inequality has grown. As a result, more and more land is concentrated in fewer hands, mainly serving the interests of corporate agribusiness and distant investors, using industrial models of production that employ fewer and fewer people’*
- 6.2 A.2 reference could be usefully made to the 2023 UNGA resolution on ‘Promoting the social and solidarity economy for sustainable development’ (A/RES/77/281).

- 6.2 A.3 (i) the reference to ‘supply chains are enabled to provide improved access to nutrient dense foods for all consumers at affordable prices’ would be appropriately revised to ensure reference to **healthy and sustainable diets** rather than nutrient dense foods in line with global guidelines.
- 6.2 A.4 should include reference to regulation of **aggressive marketing of ultra-processed foods** by food corporations as a potential measure to tackle the strong connections between income inequality and their consumption among the poor (increasingly both rural and urban), including children and adolescents. As noted in our previous comments on the draft report last year: *‘It is very important to also look at trends and the rate of BMI increase – which is very high in rural areas in LMICs: ‘There is an urgent need for an integrated approach to rural nutrition that enhances financial and physical access to healthy foods, to avoid replacing the rural undernutrition disadvantage in poor countries with a more general malnutrition disadvantage that entails excessive consumption of low-quality calories.’* <https://www.nature.com/articles/s41586-019-1171-x>
- The financialization of the food system remains an unaddressed issue, while food speculation and unregulated agricultural markets often drive inaccessible food prices.
- **Agroecology** – Given the considerable attention paid in the report to the potential of agroecology to advance equality across food systems (Section 5.2.2), while increasing availability for healthy and sustainable diets (which should be composed of fresh and seasonal food as far as possible) the scaling up of agroecology would seem to have a crucial role to play. However, this is not the case and there is currently a single reference in passing (6.2 A3 i) in the context of a recommendation to invest in territorial approaches. Greater attention is required to agroecology as a priority policy area.

Tackle inequalities in related systems (note this might be more correctly phrased as something like *‘Tackle inequalities across other systems with an important bearing on FSN outcomes’*)

- 6.2 B.5. regarding **ensuring universal access to social protection**, reference should be made to the role of national governments in upholding the right to food (not just to ‘support the most marginalised groups’) bearing in mind that in many LICs and LMICs the majority of the population are currently unable to afford a minimally healthy diet with disastrous nutrition and health outcomes that further exacerbate inequalities. As noted in our previous comments on the draft report last year: *‘Reference should be made to ILO’s definition of social protection including universal social protection, the concept of the ‘social protection floor’, adequate wage increases, greater support for vulnerable economies and respect for labour rights. As ILO states – Universal social protection is a human right and a state responsibility’* In particular, reference should be directly made to the international USP2030 initiative (Global Partnership for USP launched by UNGA) which states: *‘Universal social protection is a human right’. ‘It has never been more urgent to implement national social protection systems for all, starting from a solid floor of basic social protection guarantees’. ‘Social protection refers to a nationally defined system of policies and programmes that provide equitable access to all people and protect them throughout their lives against poverty and risks to their livelihoods and well-being. Social protection promotes social cohesion and reduces poverty, inequality and other deprivations (e.g. a lack of access to healthcare,*

education, hygiene, water and sanitation, nutrition, protection, shelter and a healthy environment). Social protection also facilitates human development and access to decent working and living conditions, and enhances people's resilience in the face of shocks and structural transformations' (USP2030, 2019). As emphasised in the INTPA Reference Document (No 29) on Addressing Income Inequalities (Volume 2) 'Informal workers (basically self-employed or casual workers) make up more than 60 per cent of the global workforce (approximately 2 billion people), yet they are often excluded from all forms of social protection. They neither benefit from employment-related protection, because they lack a standard employment relationship, nor have access to the social assistance packages for the most vulnerable.'

- Social protection for all is also a commitment embedded in the 2030 Agenda for Sustainable Development (SDG 1.3). Recognizing that universal social protection systems take time to set up, governments often prioritize certain groups for social protection support. Available evidence suggests that, from an FSN standpoint, **mother and child benefits** (universal, to the extent possible) can have an impact on dietary diversity and intake of micronutrient-rich foods. (see also: EU Action Plan on Nutrition, 2014).
- 6.2 B.5 regarding **fiscal space**, attention should also be ensured to the dramatic shrinkage of fiscal space brought about as a result of ongoing global trend whereby the transfer of net wealth has taken place from national governments to the private sector (as presented in the 2022 World Inequality Report where it is noted that the Covid crisis has accelerated this trend). **Growing international debts** should also be highlighted as a critical issue determining the ability of national governments to effectively address inequalities and uphold a rights-based approach.
- **Governance**: An important policy area arises with regard to the careful scrutiny and management of multi-stakeholder dynamics in line with a rights-based approach in various contexts and bearing in mind unequal resources and capacities of various stakeholders from the outset of engagement which risks the perpetuation of power asymmetries and inequalities. In general, it is important to examine more deeply the institutional roles and responsibilities at stake to ensure greater clarity of recommendations with a view to **effective implementation of a rights-based approach**, whether at the local, national or global level. Given the current reality, recommendations such as B.6 (i) may be read as generic and unrealistic: *'Monitor and regulate, as appropriate, corporate power asymmetries in food systems governance and decision-making, and the FSN implications of the expansion of large agribusiness and food corporations'*.
- 6.2 D (i) and (ii) should be prioritised, with emphasis on **affordability of healthy diets and inequalities of nutrition outcomes** including both stunting and overweight / obesity. Indicators and targets for FSN outcomes have not generally been inequality sensitive (historically the focus has been on basic indicators aligned with SDG 2) and this urgently needs to change (as exemplified by the EC's recent launch of the Inequality Marker initiative).