

CFS – Global Strategic Framework for Food Security and Nutrition.

Annotated outline

Civil society organizations and social movements involved in the process of building the Civil Society Mechanism to interface with the reformed CFS conducted an electronic consultation on the GSF annotated outline that generated different inputs.

Due to the tight timeline proposed, it was not possible to consolidate the main contributions into one common comment. Therefore we submit the attached three comments, elaborated by different sets of organizations.

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Comments by Civil Society organization members in the CFS GSF Task Team (VIA Campesina, FIAN , Tierra Nuova)

1. We would like to welcome the new draft of the annotated outline and reaffirm the strong support to the process and timeline approved by the CFS Bureau for the elaboration of the GSF, to be finally submitted and approved by the CFS session in October 2012. We also reaffirm our commitment to mobilize Civil Society Organizations and Social Movements to take active part in the proposed consultation processes and to promote an active engagement of civil society with our governments in the different national and regional processes of discussion of the annotated outline.
2. As a contribution to the final draft of the annotated outline, we would like to propose the following comments, in line with our interventions during the meeting of the Task Team, at the end of April.
3. We propose that the logic and the sections of the outline should be changed to:
 - a. Section 1 - Statement of rationale, purpose and function.
 - b. Section 2 - Structural causes of food insecurity and malnutrition.
 - c. Section 3 - Priority issues to be addressed (these issues should flow from section 2, and deal with the structural causes)
 - d. Section 4 – Policy options (this section should flow from section 3, i.e. the policy options should represent the measures that could be taken to address the issues identified in Section 3. There could be alternative options for the issues, describing likely repercussions)
 - e. Section 5 – Monitoring
4. The following paragraphs provide more specific comments to each of the proposed sections.
5. Section 1
 - a. The first paragraph should read:

“The GSF will start from the premise of a shared objective to eradicate hunger and malnutrition sustainably, with interim objectives as laid out in the Millennium Development Goals, **within the framework of international human rights provisions, and relevant agreements addressing the issue of hunger and poverty, and in particular towards the progressive and full realization of the human right to adequate food for all.**”...
 - b. The second paragraph should read :

“In discussing the rationale for development of the GSF, the introductory section will recall earlier discussions in CFS and other fora and explain how the GSF will add value to the development process by drawing on existing frameworks and securing buy-in across the stakeholder spectrum. It will clarify that the GSF is intended to offer clear guidelines and recommendations for coherent action at the country **and international** level that have the buy-in of the full range of stakeholders and the endorsement of the High-Level Panel of Experts, respecting country ownership of programmes to combat food insecurity.”
 - c. The paragraph starting with “Further to this...” should read as “In order to fulfill its objectives the GSF will:” and bullet number 5 should read:

“Describe principles and options for governance **and accountability** mechanisms and systems for the development and implementation of food security and nutrition strategies;”
6. As proposed above, and in the task team meeting, section two should deal with possible structural causes for the present food crisis and for the high prevalence of hunger and malnutrition over the last four decades if not longer, such as:

- a. Policy incoherence and fragmentation at the international and national level;
 - b. Inadequate governance of Food and Nutrition security, negatively impacted by other sectoral policies
 - c. Reduction of international and national investment in small scale agriculture in most developing countries.
 - d. The expansion of the agro industrial model and the impact on access natural resources (land, water, seeds, etc) on food and nutritional security, including food safety issues.
 - e. Insecurity of land tenure and access to productive resources by the most affected.
 - f. Trade policies and their role in undermining food and nutrition security, calling attention to the fact that domestic food production should have a clear priority over international trade .
 - g. Insufficient attention to the promotion of the rights of women, including access to land, to jobs, and reproductive health.
 - h. Among others.
7. In section three, we identify at least three additional issues that should be incorporated:
- a. The issue on how to guarantee secure land tenure and access to productive resources, and how to support the strengthening of small scale farmers agriculture, along agro ecological model, should be one of the central issues to be prioritized
 - b. The link between the food crisis and the poverty, energy, ecological and financial crisis: as main threats to food security are increasingly coming from other policy areas, such as energy, trade, investment and financial policies, a real GSF needs to ensure coherence of those policies with the fight for food and nutrition security.
 - c. The accountability of stakeholders under international human rights law, and other agreements and provisions related to hunger and poverty, in particular under the right to adequate food accountability.
8. Section 4, on Policy Options. We would suggest reordering the section, starting with the topic on the rights based approach, and including the following topics:
- a. The need to ensure coherence of Food and Nutrition Security policies with related energy and climate policies, financial and trade policies.
 - b. Strengthening fairness in trade systems, by recognizing the trade does not automatically foster food and nutrition security, but needs to be reshaped under this primacy
 - c. The need to include rights-based accountability mechanisms on all levels, national and international
9. We would propose that the title of the section 5 should read: Monitoring progress towards objectives at country and international level and we recommend that:
- a. The whole should be rewritten to take into account the need to monitor the impact of the GSF as such, and its impact on further coordination, coherence and suggest parameters to hold intergovernmental organizations and the CFS itself accountable to the proposed goals of the GSF.

May 19th, 2011.

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Comments by Save the Children and Concern

Overarching Comments

- Language needs to be consistent throughout; i.e. food and nutrition security OR food security and nutrition, the latter is narrower and puts the emphasis on the 3 components of food security and not the wider determinants (WATSAN etc). We recommend that definitions be given in the introduction to the document (rather than the very end); we suggest using the following (as per the SCN's 6th report on the World Nutrition Situation)
 - *Food security exists when all people, at all times, have physical, social and economic access to sufficient, safe and nutritious food that meets their dietary needs and food preferences for an active and healthy life.*
 - *Nutrition security exists when food security is combined with a sanitary environment, adequate health services, and proper care and feeding practices to ensure a healthy life for all household members.*
- If the GSF Framework aims to encompass 'food and nutrition security', this should be reflected throughout the document with adequate reference to the wider implications of (ie. The necessary collaboration with other sectors particularly Health and water and sanitation). The full title of the GSF should also be renamed as the " *GSF for Food and Nutrition Security* " .
- The critical element of cross-sectorality i.e. the inclusion of nutrition in other sectors, both in terms of programming and institutional arrangements at country level should be highlighted

Introduction to the annotated outline (p1)- Principles section:

- Reference to the right to food should be made up front, especially when considering the principles. This would intrinsically include issues of food safety, ensuring food based on people's needs, not disrupting local production etc.
- This section also needs to make specific reference to SUN Framework as it is the only nutrition centred framework
- Principles should make reference to people affected by hunger, food insecurity and undernutrition (bullet 2) and refer to other frameworks for food security and nutrition (bullet 3)

Section 1 (p2) Statement of rationale, purpose and function

- The first and last point under function of the GSF could be amalgamated – repetitious.

Section 2 (pp 2-3) Long-term challenges to food security and nutrition

- The document should explicitly acknowledge the unique vulnerabilities of women (particularly in regards to the burden of malnutrition in terms of their own physical health, their children's nutritional status and health and their productive capacity) and of children aged 0-2 -i.e. from conception to age 2 (when children are most vulnerable)
- It also must be made clear that food production is not necessarily synonymous with production of nutritious foods and that meeting increased demands for food must primarily be about producing the right types of food ; foods that contribute to dietary requirements. There must be an acknowledgement of the need to go beyond meeting kilocal requirements - a target that does not guarantee adequate nutrition particularly for the groups most vulnerable to and affected by undernutrition; I.e, pregnant and lactating women and children.
- There must be recognition that this is, in large part, a man made crisis: Both the economic crisis and food price volatility affect affordability of nutritious diet. Economic access should be treated as an immediate and long term challenge
- The fact that several challenges may occur simultaneously must also be highlighted. Some countries struggle with recurrent crises (droughts, floods) of which man made crises exacerbate.

Section 3 (pp3-4) Priority issues to be addressed

- When discussing food price volatility and associated increased investment in agriculture, it is stated that *'Such investments are not always beneficial to recipient countries and poor populations.'* It is important to acknowledge that increased investment in agriculture as a result of recent food price rises has failed to consider nutritional outcomes as measures of both need and efficacy.
- In this same section, in respect to the list of longer-term structural priority issues
 - Bullet 1 Structural factors affecting food security: - Progress in reducing child malnutrition have been extremely small and slow. The number of stunted children has actually increased from 178 million (as estimated in 2008) to about 195 million. From 1990 to 2008, the proportion of children under five in the developing regions who are underweight only declined from 31 per cent to 26^{[1][2]} per cent and it is believed that these progress have ben jeopardised by the food and economic crisis of 2007-08. This should make explicit reference also to nutrition and should acknowledge the fact that, for example, that just twenty-four countries account for more than 80 per cent of the global burden of chronic undernutrition, (as measured by stunting). .
 - Bullet 2 Environmentally sustainable food and agricultural production: One of the current challenges is about building on and working towards strengthening the potential for agriculture to contribute to the reduction of malnutrition. We strongly suggest referring to the policy consultation process which is being facilitated by IFPRI around *"Leveraging Agriculture for Improving Nutrition and Health"*. A statement synthesis the main conclusions of this consultation and can be found [here](#).
 - Bullet 3 "Challenges Faced by Women" – as mentioned earlier, Women have their own unique set of responsibilities (and vulnerabilities) in terms of securing food and nutrition security, as producers of food themselves, as income earners, as primary caregivers and as mothers. A women's nutritional status is critical not only to her own health but also to her ability to maintain a secure livelihood as well as her ability to ensure that her children are properly nourished and healthy (both in the womb and from birth)

In particular, this section should highlight how the tensions between the responsibilities of women mentioned above and their lack of decision-making power over critical decisions that affect children's nutritional status play out as well as how these tensions can be eased.

- Bullet 7 Vulnerability – See comments above in regards to the explicit acknowledgement of vulnerability of mothers and children aged 0-2. Vulnerabilities strongly vary depending on contexts; for example. Across the developing world, children from the poorest households are twice as likely to be underweight as children from the richest households. Children in rural areas are nearly twice as likely to be underweight as those in urban areas . It is also critical to make reference to social protection, highlighting linkages with food security and nutrition.

Need to include the increasing need for diversification of livelihoods brought upon by crises and the need for the poor to get income from non-agricultural based activities. The needs of the most marginalised, including those not working and those whose livelihoods are highly vulnerable to risks must also be tackled. Building households' resilience through livelihood-enhancing programmes that build assets, allow and stimulate investments in more and higher risk resources, and promote resistance to stresses through more productive and with higher return activities need to be part of the range of interventions. This is linked to the point about Vulnerability.

- Bullet 8 Investment in agriculture - This should include an exploration of the reasons why agriculture investment has failed to leverage improved nutritional outcomes and how this can be corrected.
- Bullet 9 Improving governance of food security and nutrition at all levels- This requires emphasis on leadership and accountability; and fostering coordination and linkages between governance structures not least nutrition.

Section 4 (pp 5-6) Policy Options

- Agriculture as an engine for development: The food security agenda should also focus on investing in agriculture that aims to improve nutritional outcomes. Larger yields may increase food supply, but mono-crop production or greater quantities of low-nutrient content crops often do not translate into adequate quality with respect to nutrition of children (or greater access). Support to nutritionally valuable and other types of production which can improve the incomes and diets of the poorest is crucial for leading to an improvement in nutrition with measurable outcomes.
- Overall, it is important not to define these as separate responses; what is needed are packages of interventions that can address the multiple and interlinked drivers of food insecurity and undernutrition; for example the combination of safety net interventions alongside agricultural development support for the poorest households (particularly small landowners) allows them to cover their most essential needs. It also enables them to engage and invest in their own productive activities that they could not have initiated and/or sustained without the safety net support.

Section 5 (pp 6-7) Monitoring progress towards objectives at country level

- When relating to regionally agreed targets, could also include CAADP
- The section states that 'the GSF may provide guidance on measurement criteria and common performance indicators to be adopted.' These should include both nutrition-specific and nutrition sensitive interventions
- A set of nutrition indicators are currently being developed for the SUN and we strongly recommend that discussions be held with the Chair of SUN, Dr Nabarro so as to ensure a common set of nutrition indicators

Comments on the CFS Annotated Outline Global Strategic Framework for Food Security and Nutrition
(version of May 11)

Comments submitted by CIDSE

In general, the draft annotated outline is a starting point; but much work is needed. The GSF is a document of monumental importance and this initial outline is still quite vague.

On the following aspects, CIDSE suggests modifications and/ or more precise formulations:

- **General comments:** Some of the issues under “priority issues” are actually not issues (the role of small producers is not an issue). A better analysis of the priority issues is necessary. Also, the policy option presented do not relate to the issues.

The annotated outline is weak in the nutritional dimension; given the nutritional transition taking place in the world and its impact on food security this aspect cannot be ignored. The GSF is Global in nature and refers also to urban poor in developing and developed nations alike. Cheap unhealthy food should not be the objective to pursue

- **Long Term Challenges:** It’s important to not frame the major challenge to food security as one solely of scarcity. The food challenges we face go beyond production (i.e. also storage) and this should be recognized. On the list of long term challenges the question of access and distribution should be examined and analyzed

Also, food insecurity affected different constituencies in different ways. Olivier de Schutter refers to four groups which comprise the most vulnerable to hunger: Rural landless (20%), small holder farmers (50%), pastoralists/ fisher folk and forest dependent communities (10%) and urban poor (20%). Any attempt to discuss the challenges of food insecurity should therefore consider its multidimensional causes and how they impact these groups

Pastoralists and fisher folk, in general are obscured in the analysis and policy options

- **Participation:** Under point 4 in the introduction. It is stressed that the Annotated Outline shall just stimulate the discussion on the GSF with pre-determining the outcome of future “broad consultative process”. CIDSE suggests adding a paragraph on the process by which the CFS will make sure to enable such a “broad consultative process” that ensures meaningful and informed participation of the groups most affected by and/ or vulnerable to hunger. We recommend that if this genuine participation is to materialize budgetary implications will need to be considered at the onset. Also, a genuine participatory process will need to go beyond electronic submissions if we are to engage the most vulnerable.
- **Status** of the GSF: Bullet point 3 in chapter 2 of the introduction on page 1 should make it clear that the GSF should provide a framework strategy for food policies that will inform and help to align strategies, policies and programs of other Intergovernmental Organizations (IGO) in the field of agriculture and food security.
- **Rights based approach:** CIDSE welcome that the GSF will chose a rights based approach (see chapter 3, page 4) and be grounded, inter alia on the *Voluntary Guidelines to Support the Progressive Realization of the Right to Adequate Food in the Context of national Food Security*. (see chapter 4, page 5). In order to make sure, the right to food is mainstreamed in all chapters

of the GSF, CIDSE recommends to strengthen the rights based language at the following points of the Annotated Outline:

- Page 2, para 3: “the GSF is intended to offer clear guidelines and recommendations for COMPREHENSIVE action AND POLICIES OF STATES AT THE NATIONAL AND INTERNATIONAL LEVELS COHERENT WITH HUMAN RIGHTS OBLIGATIONS.”
 - Page 2, chapter 2, para 1: “affecting the realization of food security, nutrition AND THE RIGHT TO FOOD for all people at all levels”.
 - Page 5, para 1: Instead of “At the same time, the GSF should be grounded on...”: “BOTH IN LONG TERM AND SHORT TERM MEASURES, the GSF should be grounded on ...”.
 - Page 6, para 3 on Agrarian reform: “This should be achieved through a programme coherent, RIGHTS BASED, ethical, participatory and integrated policies”.
 - Page 5, chapter 5, para 2: “The GSRF should provide guidance in monitoring their own progress towards their stated objectives IN THE CONTEXT OF THE GSF RECOMMENDATIONS. IT SHOULD SUGGEST THE DEVELOPMENT OF A REPORTING FORMAT BASED ON THE PRINCIPALS DEVELOPED IN THE *Voluntary Guidelines to Support the Progressive Realization of the Right to Adequate Food in the Context of national Food Security.*”
- **International dimension:** The GSF should not only develop recommendations for states on the country level but also recommend international action in order to develop an “enabling environment” for the realization of the right to food. A bullet point on this international dimension should be added on page 2 under chapter 1. In the chapter 3 and 4, this international dimension should be strengthened especially on the aspects of price volatility and the trading systems.
 - The regional dimension is omitted from the document and could be elaborated on in the second paragraph under section 5 on page 6. Referring to regional dimensions could facilitate the incorporation of other references/ analysis which have been compiled regionally
 - **Volatility:** On page 4, the paragraph on price volatility, should not only recommend policy responses at the country level to increased price volatility but also international regulations (of excessive commodity speculation) and international support (to strengthen food reserves) in order to reduce price volatility. At the same it should mention other international factors that increased price volatility, such as the public promotion of the production of agrofuels in the EU and the US and the increased use of grain for feedstuff, and recommend appropriate steps to address these factors.
 - **Trading systems:** The formulation on page 5, second paragraph from below on the positive role of “open trade flows” is not based on empirical evidence. Opening of markets has often increased vulnerability of Developing Countries to import surges and directly or indirectly subsidized agricultural imports with harmful impacts both on incomes and the right to food of smallholders but also overall domestic food production and availability. The demand of LDC and other countries for more policy spaces to protect sectors and products sensitive to food security must be taken into account in a chapter on trading systems.

As the guiding global instrument to eliminate hunger and ensure food security should perhaps consider an explicit commitment to subject bilateral/multilateral trade agreements to a rights based impact assessments