

Food security and nutrition: building a global narrative towards 2030 - HLPE consultation on the V0 draft of the Report – CSM Comments – 26 February 2020

This document conveys the collective input of the Civil Society and Indigenous Peoples' Mechanism (CSM) regarding the e-consultation by the HLPE Steering Committee with respect to the V0 of the upcoming HLPE Report. The document is based on the ongoing work of the CSM Global Food Governance Working Group.

The Civil Society Mechanism (CSM) warmly welcomes the initiation of a CFS collective process to reflect on and engage with the critical issue of reshaping the global narrative towards 2030 by rethinking how our food is produced and how food systems are operated. The V0 draft of this HLPE report presents us with a few evidence elements of the different production, governance and agency models and gives us a basis to assess what steps are needed towards the real transformation of food systems so urgently needed. **As CSM, we have been the strongest advocates for the CFS to take on workstreams that aim to reshape and transform current dysfunctional food systems. We take this opportunity to put forward once again this urgent call for change, while putting forward the perspectives of the most affected and reaffirm our commitment to engage comprehensively, and with the full scope of our diverse constituencies, with this report process and the policy engagement that will follow.**

General Comments:

First of all, the paper could be framed more clearly as an account of how the CFS's work has contributed, over the past 10 years, to build a food systems narrative. This is mentioned from time to time but should be highlighted as the main red thread of the text.

Secondly, the paper should draw not only on HLPE reports and 'major outcomes' but also on the policy processes – past and present - and on the prophetic choice of workstream issues for the future. Among the past policy processes the report should highlight the group of recommendations unveiling and celebrating the central role of small-scale producers (referring also to the monitoring exercise of last October). Regarding the present workstreams, there is relatively little reference to agroecology, but also to the work on food systems and nutrition. Regarding the future, the report should note the people-centered nature of the path ahead and the identification of inequalities as the overarching structural issue.

Thirdly, the report should not seek ground level consensus among the HLPE SC members, and much less among CFS MSs and participants, but have the **courage to identify the areas on which there is NOT consensus and/or where policy incoherence is a big problem**. These are the ones on which further political debate is required. The areas of controversy, gaps and uncertainties would need to be better highlighted. In this sense, the document needs to better elaborate on the changes in nature and narratives **in relation to the governance of food systems** that we are witnessing now (Human Rights principles being questioned, Multi-Stakeholder Platforms (MSPs) as governance model, power concentration, weak global accountability and policy coherence...). Attention should be paid to addressing these issues in the context of the existing foremost inclusive intergovernmental forum for food issues, the CFS, rather than instituting a new governance architecture for food (e.g. through the Food Systems Summit), which might seem "more powerful" but in reality would be less legitimate and respectful of governments' roles and responsibilities.

Fourthly, although the CFS's work in **building a rights-based, people-centered approach to monitoring** merits mention, **food Governance cannot be limited to monitoring**: there must be a change of the States' roles vis-à-vis rights-holders and private sector. The fact that global trade and the construction of global markets is undermining the Right to Food and FSN needs to be emphasized. It must be acknowledged that the CFS should be looking at the implementation gaps (lack of uptake) and difficulties of engaging in an incremental monitoring process leading to increased accountability.

Fifthly, in numerous places the **political dimensions of issues are under-considered or not considered at all** (e.g. pg. 14 para. 2 where the promotion of processed foods is not mentioned as a cause of growing obesity)

Finally, the use of the term **'system' or 'systemic' does not seem to encompass the ways in which different dimensions interact**, although the need to do so is referenced. Instead, in various places in the report, the text simply lists a number of "challenges". The **Pathways section is weak and does not address the key challenges presented in the previous section and does not even seem to build on the analysis of the previous section**. Especially notable are the absence of strong regulatory and structural measures to tackle corporate concentration and the industrial food system; the undermining and violations of the rights of small-scale food producers and workers; the power of finance capital and digitalized agriculture; destruction of eco-systems, biodiversity, etc.

1. *The VO draft is structured around a conceptual framework that proposes to focus on six dimensions of FSN. Along with the four established pillars of FSN (availability, access, stability, utilization), the VO draft also discusses two additional dimensions: agency and sustainability, which have become increasingly important and recognized dimensions to achieving sustainable food systems. **Do you think that this framework addresses the key issues of FSN?***

The six dimensions should not be used as the basis for structuring the potential policy pathways, since these act against any idea of a systemic approach and oversimplify the very idea of interconnected policy pathways. As CSM, we acknowledge the inclusion of the two additional dimensions of agency and sustainability. We believe, however, that these dimensions are certainly not new; **sustainability is being reflected in numerous international engagements**. The document seems to lack interconnectedness between these added dimensions; agency should support sustainability, while at the same time the "sustainability" discourse should not undermine the agency of the most marginalized groups. The definition of the sustainability dimension tends to limit it to the sole environmental aspect, while agency is addressing more the social aspect. It is, therefore, essential to keep these elements as **agency also reflects the increasing recognition of food sovereignty in the public sphere**, put forward by social movements and translated in different countries into national policy. Furthermore, while defining agency there should be an inclusion of the **roles and obligations of the state to ensure the structural conditions for agency**. Its description should be strengthened and not limited to acting independently and exercising free choice; 'agency' should not only refer to individuals (e.g. consumer's choice), but also to collective actors. It should be defined along the lines of the HR principles of meaningful participation, non-discrimination and empowerment. Information and capacity on the parts of people are important but not sufficient pre-conditions for realizing agency. Who is/are responsible for the compliance to the right to food? Who is/are responsible for ensuring appropriate structures for addressing power differentials, and ensuring that disempowered people have the ability to secure their rights, etc.? This will ensure that the central agency in transforming our food systems for achieving sustainability in all aspects (economic, social, environmental) and for all comes from small-scale food producers, fisherfolks, pastoralists, agriculture and food workers, women, indigenous peoples, landless, consumers and urban food insecure and their organizations. We emphasize the importance of setting such actions within the framework of the UN Decade of Family Farming and the UN Decade for Action on Nutrition, which is currently undergoing its Mid-Term Review.

In this sense, the current VO of the report lacks a **human rights' framework, which would be the basis for ensuring all dimensions of FSN proposed**. Although there is an explicit mention of the right to food, it must be acknowledged that, today, it is not the "lack" of the right to food which is a challenge in achieving agency, but rather its violation because of different kinds of discrimination: gender, caste, race, ethnicity, etc. Furthermore, the right to food must go hand-in-hand with other human rights. Hence, we strongly feel that the **indivisibility and interdependency of human rights** is completely missing from this report.

The gender perspective should be strengthened by recalling the centrality of women's rights and gender equality. **There should be a full recognition of women as civic actors, knowledge bearers and agents of transformation**, and analyse how a food systems transformation can contribute to their economic autonomy by also deconstructing the current dominant power balance paradigm. In the same line, Youth is fundamental in the new global narrative, given their role as an economic, social and cultural actor for inclusive development for local communities as well as the leadership, agency, autonomy and diversity of Youth in

food security and nutrition related processes. This requires the establishment of coherent public policies conducive to the self-determination of Youth and the appropriate public policies ensuring a sustainable integration of Youth in policy decision making processes, at all levels (local, national, regional and global). Strengthening Youth's social capital as active part of their communities and territories and ensuring a **clear focus on Youth agency and autonomy** for their future will rebuild the status of Youth.

More in particular, stability and sustainability are not separate dimensions of FSN but overarching attributes that refer to all of the dimensions. This should be reflected in Figures 1 and 2.

2. *The VO draft analyzes in what way thinking on FSN has shifted in recent years as articulated in past HLPE reports; and how these insights can feed into a global narrative on how best to meet SDG2 targets. Do you think that the analysis of the evolution of conceptual approaches and thinking on FSN clearly addresses its current adequacy to meet the SDG2 targets?*

We acknowledge the shift in thinking from a siloed approach on FSN towards a more holistic one which interconnects multiple sectors within food systems. The HLPE report should, therefore, recognize that **food systems serve and support multiple public objectives** within all domains of sustainable development, from livelihoods to the health, socio-cultural and ecological ones. Although the VO draft shows the need for a radical transformation and food systems, the document should enhance that repeated recent experiences have exposed the **urgent necessity to realign food systems with these multiple domains of life if we are to truly pursue a pathway towards the full realization of the right to adequate food and other interconnected human rights, the protection of the planet and its biodiversity, and sustainable development.** The understanding of malnutrition requires, above all, recognition of the need for justice and appreciation for diversity and the values of human dignity, equity, sustainability and sovereignty.

Another important change in awareness of FSN and strategies to achieve it is the importance of multifunctional approaches. **It is no longer adequate to focus on single dimensions of FSN or on single outcomes of the food system without considering their synergistic or competing effects.** The 2018 HLPE report on "Agroecological and Other Innovative Approaches..." brought this out although not with sufficient explicitness, in showing that some approaches meet multiple goals of improving livelihoods, biodiversity, nutrition and health, soil fertility, etc. and other are focused on limited goals.

The upcoming **HLPE report should do an in-depth analysis** of why the current hegemonic food system and agro-industrial production model are not only unable to respond to the existing malnutrition problems in all its forms but have also contributed to the creation of different forms of malnutrition and the decrease of the diversity and quality of our food and diets, as well as to the environmental destruction and climate crisis that we are witnessing. The dramatic **restructuring of food systems needs to start with a comprehensive and realistic understanding of different kinds of food systems in the world** (including the so called "global food system"): what are they; who they sustain; how they are sustained, strengthened or undermined (important here to examine trade, investment and finance policies); their full/true costs; their benefits—beyond nutrition; their footprints and contributions to the climate, ecosystems, animal and human health, etc.--, looking at history and future generations; and the powers (official and private) that support and benefit from particular food systems. The new narrative should not perpetuate a "productivist" frame of thinking as so many past narratives have.

While it is important to acknowledge all forms of malnutrition, we would like to stress the need to include explicit references to hunger, as "more than 820 million people in the world are still hungry today"¹. Hunger seems therefore a problem relevant enough to be spelled out in the FSN global narrative and not "camouflaged" in the terminology of malnutrition. Furthermore, there should be an inclusion of moderate food insecurity in the section beyond hunger, on the basis of the FIES data.

¹ FAO, IFAD, UNICEF, WFP and WHO. 2019. *The State of Food Security and Nutrition in the World 2019. Safeguarding against economic slowdowns and downturns*. Rome, FAO. <http://www.fao.org/3/ca5162en/ca5162en.pdf>

In its structure the document should be clear of which pathways can meet this new narrative's objectives to achieve FSN for all, and which will not. Although "not one size fits all", the document should be explicit of some guiding principles to achieve a transformation of food systems which is sustainable in all aspects, equitable and cuts across the 6 new dimensions of FSN for all. These guiding principles include:

- Centrality of people
- Realization of the right to food
- Healthy diets require a healthy planet²
- Interrelatedness of human rights
- Equality and non-discrimination
- Rights of Peasants and Other People Working in Rural Areas
- Women's rights
- Strengthening of Youth's social capital in communities and territories
- Food traditions and cultural heritage
- Participation, sovereignty and self-determination

Regarding the pathways leading to the transformation of food systems, the document:

- Lacks indication on their transformative potential, by addressing systemic barriers, obstacles and lock-ins and scaling up systemic responses based on Human Rights
- Can't be limited to national or local context, when the international framework is presenting obstacles to transform food systems
- Should recognize not only the diversity of situations but also the fact that there are global phenomena and power relations that impact on all diverse situations and that need to be addressed.
- Should not "*need to better integrate existing knowledge over transformation pathways*". It should rather integrate pathways which need to be reinforced to ensure their true transformative potential.

In this sense, the latest HLPE report's (#14) extensive analysis and its primary contributions clearly demonstrate that **Agroecology is a truly transformational pathway to address all the structural changes** needed in our food system in a systemic and integrated way. Agroecology has catalysed the agency of those most affected by insecurity and marginalization to become the architects and drivers of socio-economic justice in their food systems. One of agroecology's strengths is **its ability to spread and scale out according to the needs and capacities of each territory**. Since such an approach clearly **pursues many critical public objectives**, the report should therefore assess the political and economic obstacles that prevents agroecology to spread and scale out according to its full potential, moving beyond and challenging the notion that global/industrial and local food systems can easily coexist. In this sense, there is a need to more explicitly elaborate on the debates on the implications of the need for "**radical transformation**" in terms of **what needs to be downsized and what needs to be upscaled; embracing the shift is not sufficient**. Therefore, the section on diverse situations, variable solutions should also highlight that **certain solutions imply contradictions or even can't co-exist**. This has been highlighted in the debates at the CFS in relation to Forestry and to livestock. The note should highlight these tensions.

² There is already an inclusion of healthy diets referring to the latest publication by WHO and FAO (FAO and WHO. 2019. *Sustainable healthy diets – Guiding principles*. Rome. <http://www.fao.org/3/ca6640en/ca6640en.pdf>). However, the sustainable aspect has been excluded: the latter and the current First Draft of the VGs on Food Systems and Nutrition refer to "healthy and sustainable diets", which makes clear that the sustainability and health dimension must go hand in hand. Furthermore, it should also include the social justice dimension.

Finally, the description of existing international frameworks and instruments can't be restricted to mainly CFS outcomes, while some other international regulations (or the lack of them) are much more forceful (e.g. trade rules, competition rules, investment rules, climate change commitments...).

3. *The VO drafts identifies main trends that have complex implications for all dimensions of food security. While some of these trends have widespread agreement with respect to their implications for food security and nutrition, others have less agreement and as such require more research. **Do you think that trends identified are the key ones in affecting FSN outcomes today that might help explain stalled progress on meeting SDG2 targets? Do you have additional data or information that could help refine the analysis of the interplay between these trends and FSN outcomes?***

The trends identified in the VO should be clearer about the fact that the many challenges affecting all dimensions of food security have a common root. Food must be understood as being at the core of the nexus between identities, health, ecology and livelihoods. It therefore intrinsically represents a space for convergence between different important dimensions of life - culturally, socially and economically. **Yet, policy discussions and deliberations that impact on food and food systems are currently fragmented and incoherent. With only 10 years remaining to reach 2030 and achieve all proposed goals by its Agenda, there is an urgency to respond in an intersectoral way to the rising numbers of people undernourished.** The document determines the worsening of conflicts for hunger increase and re-acutization of famines, but it should also acknowledge the **heightened levels of vulnerabilities of all those that continue to live in the margins of society. The human right to the adequate food and nutrition continues to remain grossly unfulfilled.** The challenges mentioned in the document should be explicitly closely interconnected and it should clearly highlight that current industrial food systems are increasingly making people sick and leading to massive public health costs. Indeed, childhood overweight and obesity are rising in most regions, and in all regions for adults. Furthermore, it must acknowledge that NCDs are an emerging pandemic that is radically shifting the nature of health challenges in most countries and exposing the profound limitations of an insurance-driven approach to healthcare. The silo approach that separates food and health policies leaves the nexus between these two domains largely unaddressed.

In this sense, this section is very similar to the HLPE note on critical and emerging issues. While the elements presented are important, it is rather descriptive. Following the box summarizing the issues with the different dimensions, the note should elaborate more on the main obstacles and opportunities to address them, in particular on the basis of main elements described in sections 2.2 and 2.3.

Further trends which are not mentioned or not sufficiently addressed by the current VO document:

- **Financialization** is widening the disconnect with real life and limiting the normative and fiscal space of the State.
- **Antimicrobial Resistance and animal health:** Industrial livestock and poultry raising have resulted in several public health and environmental problems, all of which have direct bearing to food systems—if we agree to not take a ‘siloes approach’.
- So far, no serious assessments on the impacts of the **digitalization of food and agriculture** have been conducted. There is a lack of clarity on these, and in particular, on:
 - the collecting and concentration of data which risks promoting an extreme concentration of power in the food and agriculture sector;
 - the impact of the entry of new actors - ICT companies - into the food sector.

The report should also acknowledge that **food has become the domain of profound technological revolutions**, all leading to the increasing homogenization, commodification, dematerialization, dehumanization and financialization of food. The mirage of technological solutions often generates a false sense of comfort that undermines the transformational shifts that need to be confronted within both production and consumption. Governments seem to have no control over this process, while digital innovations are introduced by the private sector, undermining furthermore government control over

processes in the food and agriculture sector which impacts directly the Right to Food for all. In this sense, **the latest HLPE report #14 provides a strong conceptual framework to assess “innovative approaches”** on whether they would truly transform our pathways towards sustainable food systems. It presents a holistic approach, combining production, livelihoods, gender, socio-cultural, ecological and political perspectives for the assessment of such innovations. The reduction of the ecological footprint and achievement of agency are key aspects in the latter.

- **Climate change:** the analysis does not mention natural and agro-biodiversity loss and impacts on critical species such as bees, frogs and those dependent on polar eco-systems; warming of polar and cold regions will have long-term impacts on eco-systems and bio-territories. The relationship between mitigation, adaptation and resilience are crucial, but linkages also need to be made with human settlements, for example urban expansion, mega cities, etc. that encroach on to various kinds of bio-territories/landscapes, corner critical resources such as water, change eco-systems, etc. These points are raised in different sections, but it is important for them to be together to enhance linkages.
- While addressing the **worrying expansion of the global food systems**, with its high levels of corporate concentration, the document should strengthen how this increasingly **squeezes small-scale, as well as medium-scale, food production, which not only feeds but also offers livelihoods, employment and incomes to both rural and urban communities**. On the other hand, the global food system is also promoting the homogenization of food habits across the globe, with profound **challenges to identities, traditions and cultural heritage**.
- The description of **growing concentration in agrifood supply chains** (3.10) should discuss implications for diets in more detail and draw the links with climate change, loss of biodiversity, food waste. WHO points to ultra-processed food as the primary culprit in rising global obesity prevalence; these foods are produced and promoted by the largest food manufacturers, who also resist clear labeling of unhealthy food products with their disproportionate lobbying power³.
- Investment should not be the only consideration, **but the role of the public sector more generally**.
- **Influence of vested interests in shaping scientific knowledge on the health impacts of food systems:** scientific integrity and research must be reasserted as a public good. Research priorities, structures, and capacities need to be fundamentally realigned with principles of **public interest and public good**, and the nature of the challenges we face (i.e., cross-cutting sustainability challenges and systemic risks). Specific measures are needed to reduce the reliance of researchers on private funding (e.g., new rules around **conflicts of interest** in scientific journals, initiatives to fund and mandate independent scientific research and independent journalism). Different forms of research involving a wider range of actors and sources of knowledge are also required to rebalance the playing field and challenge prevailing problem frames (e.g., a global North bias; approaches that exclude impacts on certain populations; siloed approaches that ignore food-health-environment nexus effects).
- **Trends and consequences in terms of food governance** : this could include the changing nature of roles and responsibilities between States, rights holders, the increasing recognition of MSPs as governance mode, weak translation of Human Rights principles of participation, accountability, external obligations, remedy as well as weak translation of CFS roles (coordination, convergence, coherence, uptake and accountability). We do not have clear evidence or agreement that multi-stakeholder platforms make positive contributions to the realization of the right to adequate food, and food security and nutrition, as has been recognized by the HLPE Report on Multi-stakeholder partnerships⁴.

³ Mark A Lawrence and Phillip I Baker. 2019. *Ultra-processed food and adverse health outcomes* BMJ 2019; 365 doi: <https://doi.org/10.1136/bmj.l2289>; PAHO. 2015. *Ultra-processed food and drink products in Latin America: Trends, impact on obesity, policy implications*. https://www.paho.org/hq/index.php?option=com_content&view=article&id=11153:ultra-processed-food-and-drink-products&Itemid=1969&lang=en

⁴ HLPE. 2018. Multi-stakeholder partnerships to finance and improve food security and nutrition in the framework of the 2030 Agenda. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome. <http://www.fao.org/3/CA0156EN/CA0156en.pdf>

- **Political contexts which further marginalize** small-scale food producers, indigenous people, fisherfolks, pastoralists, women, youth, landless and urban food insecure, including their practices and rights. There needs to be recognition of the **political and economic causes** which create and/or perpetuate economic and social structures that enable poverty, hunger and malnutrition, and contribute to the persistence of inequalities. There are no mentions of impacts of military/state occupations of land-territories; the use of food and emergency supplies as strategic/political weapons; and evictions of local communities because of infrastructure projects, industrial agriculture, other kinds of land grabbing, etc.
- **Inequalities are perpetuated through policies**, and legal-regulatory structures that favour the redistribution of wealth from lower income populations to higher income populations, rolling back of agrarian reform, tax breaks for the wealthy and corporations, etc. At least some of the drivers of persistent inequality should be mentioned.

One of the mandates of the CFS was to highlight factors affecting FSN that have not been considered so far and that deserve more attention in the MYPoWs. The “under-researched” trends are not identified as such, so this report does not help point toward future contributions of the HLPE. While each of the trends considered is documented, the ways in which they intersect, and overlap is not explained. For instance, approaching thresholds in the climate emergency and how this intersects with small-holder farm livelihood, natural resource degradation, civil strife and conflict and the fragile and uncertain economic situation and continued existence of hunger are not explained.⁵

4. *Drawing on HLPE reports and analysis in the wider literature, the report outlines several examples of potential policy pathways to address current challenges in ways that build more resilient and sustainable food systems and engage all stakeholders. Throughout the V0 draft there has been an attempt to indicate, sometimes with placeholders, specific case studies that would illustrate pathways to achieving FSN with concrete examples and experience, focusing on the six dimensions of availability, access, stability, utilization, agency and sustainability. The HLPE recognizes that the range of case studies could be more complete. **Are the set of case studies appropriate in terms of the dimension chosen and regional balance? Can you suggest further case studies that could help to enrich and strengthen the report? Do you agree that the selected examples are among the most promising potential pathways to achieve FSN targets toward 2030? Do you have other good practices and examples of policy and interventions that could accelerate progress towards SDG2 along the six identified dimensions?***

We acknowledge and appreciate the examples mentioned by the current V0 document as they clearly shed light on how participatory and inclusive models, agency, agroecology and grassroots activism can lead to the structural changes needed to achieve FSN for all.

In regard to Belo Horizonte’s case study it is mentioned that in Brazil “*Grass roots activism led to the creation of national food security councils*”. Established in 1994, CONSEA (“Conselho Nacional de Segurança Alimentar e Nutricional”) had a key role in policy development and monitoring related to health, food and nutrition. It was the channel for dialogue between civil society, the Presidency of the Republic and different sectors of government. The Council was extinguished on January 1, 2019 through Provisional Measure 870/2019, one of the first acts of the Presidency of the Republic. Since the announcement, several organizations have manifested themselves against the act. Almost six months after the end of the CONSEA, the decision for CONSEA’s stay came just over three months after the “Banquetaço”, a mobilization throughout Brazil for the return of the council.⁶ This is a perfect example of how “civil society’s mobilization signals that society is not willing to allow setbacks in the advances made in recent years”. On the other hand, this example can also

⁵ Timothy M. Lenton, Johan Rockström, Owen Gaffney, Stefan Rahmstorf, Katherine Richardson, Will Steffen & Hans Joachim Schellnhuber. 2019. Climate tipping points — too risky to bet against. The growing threat of abrupt and irreversible climate changes must compel political and economic action on emissions. *Nature* Vol 575 (28 November 2019), pp. 592-595

⁶ Aliança pela Alimentação Adequada e Saudável. 2019. “Quase seis meses após sua extinção, Consea volta a existir”, “Veja como foi o Banquetaço que tomou 40 cidades do país em defesa do Consea”. <https://alimentacaosaudavel.org.br/veja-como-foi-o-banquetaco-que-tomou-40-cidades-do-pais/5112/>, <https://alimentacaosaudavel.org.br/consea-volta-a-existir/5442/>

relate to our point on question 3 on how new political contexts are also part of the “new trends” undermining efforts towards achieving FSN for all and which also further deepens existing inequalities and impedes the participation of the most marginalized.

On another hand, this last section is very weak. First, **sustainability and stability** need to be considered in the context of ANY approach. Second, these “potential policy pathways forward” do not explain the associated narratives, or the logic and rationale behind each approach. This is where disagreement arises. **If the rationale isn’t clear, then this report could give the illusion that all of the “potential pathways” can be pursued at the same time.** Furthermore, the examples presented do not provide sufficient indications to their transformative potential, by addressing systemic barriers, obstacles and lock-ins and scaling up systemic responses based on Human Rights. They should build on the distinction between incremental changes and transformational ones⁷. The section:

- Should refer to existing scientific work and evidence on transformation pathways;
- Cannot be limited to national or local context, the international framework is presenting obstacles to transform food systems;
- Should refer to pathways that combine both scaling-up and scaling-down strategies; and,
- Should give more attention to the territorial perspectives in the transformation of food systems, bringing together concretely inequalities, environmental concerns and economic development.

Furthermore, as CSM we believe that although these examples shed light on “best practices”, **the building of a new global narrative process should not rely and build only on them** as they usually refer to specific contexts and look at successes without addressing the root causes of problems. Recommendations should rather look at the challenges and fill in current policy gap to achieve truly transformative pathways towards sustainable food systems for all. Nutrition priorities should be examined within a broader poverty reduction and social and economic policy space to identify policy priorities that address the underlying structural causes. The assessment should involve the meaningful participation of communities most affected by hunger and malnutrition and start with the realities people face daily.

5. ***Are there any major omissions or gaps in the VO draft? Are topics under-or over-represented in relation to their importance? Are there any redundant facts or statements that could be eliminated from the VO draft (especially considering the CFS request for a concise report)? Are any facts or conclusions refuted, questionable or assertions with no evidence-base? If any of these are an issue, please share supporting evidence.***

In general terms, the following key issues must be strengthened along the document:

- There is an overall lack of sufficient attention to and understanding of human rights.
- Agroecology is not brought forward as a policy pathway that can serve multifunctional goals and move societies forward along all of the stated dimensions of FSN. This is the most promising pathway that HLPE reports have illuminated to date, and its advantages are summarized nicely by IPES-Food (2016). The report does not meet the present need if it doesn’t show how some pathways are superior to others, in the logic of the “new thinking” about FSN. Concluding that there are “a number of concrete example of initiatives... that are consistent with CFS recommendations” is simply inadequate.
- The draft refers to the small-scale farmers but not all the farmers are landowners. Many of the farmers are waged workers (seasonal, migrant etc.). The reference to agricultural workers should be included.
- It is important to name the main drivers of continuing economic fragility, such as:

⁷ HLPE. 2019. *Agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition*. A report by the High-Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome. <http://www.fao.org/3/ca5602en/ca5602en.pdf>

- How the global value chain (GVC) model of production has undermined workers' incomes and secure employment—much of manufacturing, agricultural and services work/employment have become more precarious. The draft does not mention working conditions of the farmers/workers as well as their wages. Ideally wages should be above minimum wage but in reality, it is much below the minimum wage.
- the failure of governments to regulate financial capital effectively and expansion of financial markets; and,
- The direct and indirect subsidies that go to big capital (corporations) that allow them to concentrate wealth without accompanying gains in the real economy.