

CSM's collective contribution to the CFS e-consultation

"We ask the [governments' representatives, and particularly] men not to speak about our roles; we know about them. We have been living on the Earth with you too, we live it. Please do not speak in our name and about things we have already heard. We need to hear something new from you."

(CSM quote from the Regional Consultation for North Africa and the Near East)

The Civil Society and Indigenous Peoples' Mechanism (CSM) facilitates the voices from sectors of those most affected by hunger and malnutrition. Through an active internal consultation, which has been ongoing for the past 6 months with all sub-regions and constituencies, we have drafted the following common position to convey our messages, experiences and demands for the CFS policy convergence process on Gender Equality and Women's Empowerment (GEWE). We have invested a lot of time and energy into this process, and we would like to be taken seriously.

Through this extensive CSM contribution, we are contributing from the knowledge and experiences from territories. We feel this document is of particular importance given the absence of an HLPE report for this CFS policy process. We have suggested a number of very fundamental changes, and we look forward to them being reflected in the process and in the document that will come out of the Regional and online Consultations.

GENERAL COMMENTS

Expectations towards the CFS process and next Draft

It is urgent to have a pioneering document on gender in the CFS, which is capable of contributing to the transformation we need of an agri-food system that, as has already been pointed out in other CFS processes, is broken and does not fulfil its main function, to feed all people in a healthy, fair and sustainable way. A food model that has led to gender discrimination at all levels, from production to consumption. This process must seek firm and ambitious guidelines in order to promote real transformations on the ground.

For GEWE to be a strong contributor to attaining the sustainable development goals, of eradicating hunger among the most marginalized women and girls, the LGBTQI+ persons it is critical to address the root causes of hunger and malnutrition, the reasons for landlessness, lack of stable decent livelihood and disease.

The guidelines, as a guiding document for the State, should therefore seek to provide routes for transforming public policies beyond the instability of some of the regions' governments. Although these are Voluntary Guidelines, it is important to emphasize that they need to be coupled with measures. Public policies in relation to food should be solid and transcend governments. Public policies should transcend the access approach without a territorial perspective and should not foster assistentialism. Public policies should foster the realization of the human right to food.

We believe it is important to recall the outcomes of CFS prior policy debates that can be found [in the conclusions document of the Forum that we held at the CFS in 2017](#). This document speaks of the need to prioritise the human rights framework and the principle of food sovereignty. It also speaks of the need to incorporate this perspective in all CFS processes, incorporating and promoting the application of CEDAW and especially General Article 34. The document also mentions the need to include a feminist perspective in the development of policy documents. In this sense, the recognition of the care economy and unpaid work is key.

In this sense, we appreciate some of the improvements made within the zero draft. We welcome the incorporation and focus on unpaid care and domestic work, which as we know has been exacerbated

due to covid crisis, the situation is only going to get worse due to austerity and ongoing economic crisis in many parts of the world. We also appreciate the inclusion of General Recommendation 34 on rural women, the Free Prior Informed Consent, among others.

However, there is a need for greater consistency between Problem Statements and Policy Discussions in different thematic sections which at the moment seem to be in silos, and also within the sections where often the policy areas seem to be disconnected from their respective rationales.

The Zero Draft continues to be based on a food security perspective. This prevents a clear approach to women's human rights, the human right to food and Food Sovereignty, the latter being the horizon and the key political demand coming from the communities. We want to emphasize the importance of including the concept of food sovereignty in the document, which is different from food security. Food sovereignty is about people deciding what they eat, what they produce and how they produce it. This is very different from food security, which in reality is a notion that has led to major crises around the world and has not solved the problem.

On Human Rights

It is important for the document to not only present a reiteration of language already used in other UN documents, but also go a step beyond. Emphasizing the right to equality, respect and dignity for all persons is therefore fundamental. A genuine Human Rights framework will result in truly transformative guidelines.

The document lacks a strong grounding on human rights and lacks reference to key human rights resolutions and declarations, such as ILO resolutions, the Beijing Declaration and Platform for Action, UNDROP, UNDRIP, and the Security Council Resolution 1325 in terms of the connection between food security, peace and women's political participation in conflict resolution mechanisms, which all have a key part to play in empowering women and girls and ending hunger and poverty. The guidelines should not limit themselves on the SDGs, but use all UN initiatives, conventions, resolutions, and instruments that can protect women and girls. These guidelines should encourage governments to ratify existing conventions and use and apply these guidelines.

From a human rights approach and their indivisibility, it is clear that the realisation of the right to adequate food will only happen with the realisation of the rights of women, girls, children and LGBTQI+ people. In this sense, we believe it is important to insist on broadening the perspective of non-binary and non-hegemonic gender identities. Addressing gender must have a broader vision than the sexual diversity of women. It is therefore necessary to advance gender-inclusive language in all CFS guidelines and policy work. Human Rights are for all, and only for some.

Moreover, it is important to pay attention to not only individual rights but also collective rights; and the importance of different kinds of organisations for and by women, to ensure the realisation of their rights and agency. The right to housing is also of importance, particularly for peasant women. We will not have any other right if this right is not available.

From a North American regional perspective:

Looking at grassroots voices is fundamental for a solid human rights framework.

The word "peasants" might not resonate with all in North America. However, its definition aims to capture a wide network of people, including smallscale food farmers, migrant workers, fisherfolks, pastoralists and Indigenous Peoples.

UNDROP would therefore be a good direction to go. UNDROP presents a set of rights that aim to transform food systems towards food sovereignty. Bringing UNDROP to this setting would be

groundbreaking because it would challenge food production and market based systems through a rights and feminist lenses. Three points from UNDROP that are suitable to the North American context:

- Article 4
- Article 14: seasonal and migrant workers represent a disproportionate number in the regional context, but yet their rights are hardly recognized
- Articles 17 and 18: financialization and corporate capture of land has deeply impacted women and LGBTIQ people in North America

On a paradigm shift

The transformation of food systems, which should start today, entails changing a model that places the interests and ambitions of markets at the centre for one that prioritises and makes visible the wellbeing of women, other gender minorities and nature. This will require addressing power imbalances and not just seeking to integrate women into a model that is clearly unequal today. The recognition of peasant and rural women is fundamental in this sense because of the role they play in food systems.

Control and access to natural and productive goods, especially with regard to access to land, water and peasant seeds, must therefore be guaranteed within a solid framework of human rights and not only under productivist and mercantilist frameworks.

It is within this framework that we understand agroecology as a model to be prioritised, as it demonstrates on a daily basis that, in addition to being more sustainable and respectful of the environment, it promotes much fairer and healthier frameworks for all people. In addition to nourishing and feeding the people, agroecology recognises the knowledge of women who have fed the world for centuries. Thus, agroecology needs to be a central issue in the document as a vision of thought and constructive proposal. Within the current Zero Draft however, agroecology is placed as a secondary issue.

There also needs to be recognition of different ways of livelihoods and importance of Indigenous knowledge, which is not well enough represented in the document nor presented as a major contribution of women to the issues of food production and access to food.

We want to also highlight the need to promote policy processes in which inclusivity and participation are the pillars, especially the participation of civil society, women, non-binary persons and other actors free of conflicts of interest that allow the construction of transparent policies.

From the Arab perspective

The translation of the document from English to Arab should be reviewed, in particular for the use of “women” which has been translated to “woman”. The concept of “woman” undermines the larger conception that we, as women, entail. There is no single woman or exemplary woman to be compared to. It is very important to fix the translation and talk about women and not woman, in order to be truly inclusive.

From the North African and Near Eastern regional perspective:

We need to consider that the region is still impregnated with a patriarchal society. The culture and customs have been inherited from past generations and they have a great impact on the way rights are exercised. Disparities are deeply rooted in the region’s societies and it is very hard to overcome that. Tunisia might be an exception as it is the only country in the region which doesn’t allow polygamist marriage, environment and atmosphere. However, in the whole region there is no social protection, any kind of measures that ensure equality between men and women in the agricultural sector. Those who work in agriculture are considered as less important than those who work in other labour forces.

Pay special attention to areas of conflict. Only region in the world which still witnesses a state of colonialism which is happening in the land of Palestine. Disparities are more pronounced in these areas of conflicts. We also need to take into account the disparities of resources and scarcity of water due to climate change and how our underground water resources have suffered. We need to adapt our traditional practices to respond to these water scarcities. A lot of intersecting realities, but we need to take into account these specificities when elaborating these guidelines. The latter is important for when we will need to advocate for the Voluntary Guidelines at the level of our governments, as they will need to resonate among these governments, especially on social protection for agricultural workers and women working in agriculture in particular.

From a North American regional perspective:

In Canada and the US, agriculture production remains deeply patriarchal. To revert this, policy and social transformation are required. Nevertheless, for any political transformation, governments and legislation must be present.

In this sense, the emphasis on technologies within the document seems to keep the current power imbalances in place. Technological solutions cannot replace real structural changes in our food systems. This document should recognize instead an uplift of women and LGBTIQ+ people's knowledge, especially of those who produce food. They have on-the ground knowledge, wisdom, creativity and ingenuity learned from experience, ancestors and other food producers. Seed selection, seed saving, pest management techniques and soil enhancement methods are just a few of the examples. Sharing these forms of knowledge are also part of community building.

They are principles and practices of agroecology, which is in contrast to our current chemical dependent industrial food systems. Agroecology benefits all people, and particularly women, and our environment.

Young women and non-binary young people as first generation farmers are getting involved in ecological agriculture, in contrast with conventional industrial agriculture. This speaks to the need to support alternative agriculture training for women and non-binary people, including agroecological education. When we speak about the transformation of food systems in line with women and LGBTIQ+ people, this starts from the needs on the ground and speaks to the vast majority of networks that are held within agriculture practices in North America.

On the current context and COVID-19

The Covid-19 pandemic, 2 years old to date, has drastically made visible the immense fault lines in the political, economic and social structures of society, globally. The failure of governments to provide timely healthcare, the rampant loss of livelihood, the rapidly rising cost of food and all basic amenities, and ravaging hunger and poverty in the face of acute militarization have been glaring daily realities for the people; the women, girls and the LGBTQI+ persons have fared much worse than all other suffering people.

The failure of the governments not to meet the havoc created by such a small microbe as SARS-Cov2 is not lodged in the pandemic but the deep structural fault created by lashing neoliberalism policies of the past many decades, forcing austerity policies on the people. Deregulation and privatization have taken away stable decent livelihood, throwing women to work in harsh hunger wage sectors, eroding governments and communities abilities to look after their own, shorn away public healthcare sectors allowing private goods and services to raise costs at will. A foundation stone of sustainable development, quality education for girls, has been taken away from the public sphere to the private and further opening chasms for millions of girls, especially in the rural areas to be thrown in deep pits of illiteracy and low skill harsh working environment. Land ownership, the pivot for sustainable development, for decent livelihood, food and nutrition and security has been wrenched away; patriarchy had always made land ownership scarce for women and girls, privatization and trade

liberalization has ensured land commodification increasing by millions the numbers of the landless, all including the indigenous, evicted from their communities and ancestral abodes.

From a Central Asian perspective

During COVID-19 pandemic, the importance of access to resources was highlighted; when the borders closed much was imported. This was particularly the case for women and in particular those working in smallholdings. The main issue was that the ones working with seeds just couldn't operate. These Guidelines need to further strengthen the aspect of women and production of seeds: they need to talk about the rights of women to have seeds and to be able to produce more seeds.

Given the great migratory path of men, the workload of women in agriculture becomes a real challenge. This year the region suffered from drought, meaning that different approaches to agriculture had to be used. In this sense, women's ability to use technologies has to come hand in hand with access to resources. Women have certain technologies and skills in tilling the land, using water, growing and breeding, but they have to be able to have control over these resources. In this sense, the rights of people living and working in rural areas are fundamental. In terms of technical access, women need to be taught and trained. Farmer schools have been providing these trainings. The Guidelines should strengthen them and support women to integrate their traditional knowledge.

On discrimination

Whereas the problem statements adequately capture the social norms and cultural causes/dimensions of gendered discrimination they do not take into account contemporary causes that compound gender inequalities and gender injustice, like the current global neoliberal market based economic and financial system. This system has exacerbated income inequalities and poverty across the global south in particular.

Moreover, it is extremely important to change the binarial, patriarchal and discriminatory approach presented in the Zero Draft. Besides women and men, also other sexual orientations and gender identities need to be visible, in order to really contribute to empowerment, equality and real transformations.

Sex, gender, sexual orientation and gender identities are crucial reasons for discrimination, having direct impacts on the right to food and nutrition of LGBTI+ communities. According to the UN Independent Expert on protection against violence and discrimination based on Sexual Orientation and Gender Identity, LGBT persons have been strongly impacted in their human rights during the COVID-19 pandemic¹.

Over the past years, the UN has become increasingly concerned² with the prevalence of discrimination on grounds of sexual orientation and gender identity, and with the broad range of human rights violations they face³.

Researches have shown that the social, cultural and structural discriminations suffered by LGBTI people lead them to higher rates of poverty compared to their heterosexual counterparts. And that specially LGBTI+ youth, who face rejection from their families are at higher risk of homelessness and mental instability. The Guidelines need to address the impact of such discriminations and violences to the right to food of the LGBTI+ communities.

In rural areas LGBTI+ people face often challenging realities of non-acceptance, expulsion from the community or a life of sexual clandestinity, harassment and violations. Many of them leave rural areas still very young. The Guidelines need to name and make visible LGBTI+ small-scale food producers, who are also contributing to food security and nutrition, while often facing multiple forms of discrimination in the current food system.

¹ <https://www.ohchr.org/Documents/Issues/SexualOrientation/ImpactCOVID19LGBTpersons.pdf>

² <https://www.ohchr.org/EN/Issues/LGBTI/Pages/UNResolutions.aspx>

³ <https://www.ohchr.org/Documents/Issues/Discrimination/LGBT/BackgroundNoteHumanRightsViolationsagai nstIntersexPeople.pdf>

Also other intersectional LGBTI minorities – due to age, disabilities, race/ethnicity, migration status and other characteristics – are the often target of even bigger discriminatory behaviors. The Guidelines need to address intersectional discriminations faced by LGBTI people.

Addressing the vulnerability faced by LGBTI people in the frame of the current Guidelines is key to advance with gender equality, to end hunger and ensure food security and nutrition for all.

For all these reasons, we request that one core principle is added to the Guidelines: the recognition and inclusion of gender diversity. The Guidelines needs to fully embrace gender diversity within rural and urban areas in its scope, promoting non-discriminatory policies on sexual orientation and gender identity.

From a Latin American and Caribbean regional perspective

The document does not have an inclusive language, at least in the official Spanish translations. Part of the gender perspective and arguments believe that what is not named does not exist and that language cannot be neutral because it transforms realities and therefore has the potential to achieve equality.

The history of Latin America and the Caribbean has been marked by colonization processes which are some of the causes of patriarchy and other forms of subordination and oppression, among them racism, therefore, the document should incorporate these discriminations, particularly towards racialized women.

Because of this assumption, the document addresses ethnic peoples as minorities. In Latin America and the Caribbean, ethnic peoples are not minorities, they are the majority, they are the ones who make up the peoples, who sustain the family, peasants and community's economy and who paradoxically suffer the greatest inequalities.

All ethnic groups and diversities should be incorporated in the document: indigenous, Afro, Racialized people, Palenqueras.

From a European and Central Asian regional perspective

The general lack or even the nonexistence of data collection regarding malnutrition and hunger faced by LGBTI people in Europe and Central Asia represents enormous challenges to meaningfully address inequalities faced by individuals based on their sexual orientation and gender identity in our region. The Guidelines need to promote more research in that area.

From a North African and Near East regional perspective:

We are currently in a system which discriminates against women. Nevertheless, Palestine has signed a convention to eliminate all violence and discrimination against women. Women take part in the labour force; they seize economic opportunities. However, women suffer from a lack of plans and projects which can provide them with economic opportunities and work. This affects women's participation in the country's productivity. There are many contradictions at the level of the country's laws and it should also be noted that women that work in colonies suffer from discrimination and oppression. Income is very low, and women work in informal ways and must work around the blockades. These women are faced with many difficulties and find it very challenging to work within Palestine; they require work permits and sometimes they have to work from 12 to 14 hours per day. They confront violence, discrimination and harassment that is due to the Zionist occupation that is perpetuated by the Zionist army. Women's illnesses do not receive basic health services. They suffer from persecution and murder.

Women that work suffer from a lack of opportunities compared with men. They suffer from economic and social oppression. They must also ensure that they provide the livelihoods for their families and children.

Since the 1980s, Iraq has ratified laws on gender equality, but in practice no specific measures have been put on the ground for women. Specifically, since 2003 and the occupation, women have suffered violence and discrimination. They are marginalized directly. We have parliamentary women or heads of party that they belong to, but there is not proper representation of women.

Moreover, rural women in Iraq are needed to produce and provide food. Through civil society organisations, there have been attempts to provide training for rural women, but there are severe challenges, particularly in terms of mobility. Travelling to the south of the country is almost impossible, as weapons and groups of armed men are blocking the paths. Moreover, the region is very patriarchal. Attempts to provide training face armed people on the ground saying that women should not be taking part in trainings with men. A lot of awareness is being raised by civil society organisations, but they face a lot of pressure, including from the Iraqi government, which has done nothing to date to help women. A law on domestic violence, for instance, has not been adopted by the government and still is on hold in parliament.

From a North American regional perspective:

Discrimination against Indigenous women, LGBTIQ, black and coloured persons needs to be separately addressed in the document as they are the most disproportionately impacted.

On the current unsustainable model

It has been shown that the current global food system builds on and perpetuates gender based discrimination and the violation of women's rights, and rights of other gender identities including LGBTIQ people. By pushing a linear model, in which knowledge is produced outside the fields and in which the main objective is the production of raw materials and commodities for external markets, it does not respond to women, girls, LGBTIQ and in general smallholder farmers of the world. In order to achieve a fair and equal society where women and other genders can fully enjoy their rights, we must put at the centre the alternative model of consumption and production that ensure women's rights and rights of LGBTIQ people, recognize their central role and that it is founded on agroecology and the food sovereignty paradigm.

In order to have real impact and make progress in achieving the right to food and nutrition the document should clearly state that current food systems are unsustainable and the food produced within them is not healthy. There is a big focus on "cultural contexts and norms" as responsible for gender injustices, but there needs to be recognition of responsibilities of the current neoliberal, colonial and patriarchal economic model. There needs to be greater recognition of more resilient and equitable food systems including Agroecological approaches that have proved to be sustainable, equitable and healthy are not mentioned enough, while they provide pathways that not only ensure healthy and sustainable diets, but they also address structural causes of inequalities, particularly from a gender perspective. The document seems to suggest that the achievement of gender equality, women and girls' empowerment and rights are linked to women's integration in the current dominant food production and consumption model rather than linked to a radical transformation of food systems and the subsequent tackling of power imbalances and inequalities.

It is important to recognize that hunger is not linked to women's inefficiency as food producers, but to structural causes of gender inequality. The change that women foster on a daily basis is not aimed at simply achieving equality in an unequal economical, ecological, political and cultural way of production but to achieve a systemic change. The draft fails to present the way in which women, girls, LGBTI persons and Indigenous peoples are bearers of alternatives, knowledge, and solutions to tackle the intersecting crisis we are facing globally. In this sense, the document fails to recognize that women are looking for alternatives to the dominant model because they are exploited by neoliberal policies in general and particularly in the context of food and agriculture.

To address the root causes of food insecurity and malnutrition we need to acknowledge that they are interlinked with patriarchy, colonialism and expanding industrial agricultural initiated with the Green Revolution policies in the 1960. With the onslaught of the neoliberal model, further exploitative and

oppressive manifestations are unfolding such as the land grabbing of natural resources and women's bodies, the devastating impact of big infrastructure projects, privatization, trade liberalization and deregulation.

From an Asia-Pacific perspective

There is an assumption that integration in the current dominant food production and consumption model would correct the gendered imbalances, while in reality modern food production systems are dependent on high tech, large scale corporate, export oriented production and not necessarily geared towards small scale systems that guarantee household food security. Transformative approach requires control of the food production system at that level where women bear the responsibility for household food needs. If not careful we may end up with instrumentalisation of women and other disempowered peoples and communities and not empowerment.

More specifically, the neoliberal policies of Australia and other high-income countries of Asia-Pacific, including deregulation, privatization and trade liberalization, which undermine the transformation to food and agriculture systems based on agroecology, food sovereignty and the decommodification of land, food and labour. We don't want gender equality, and women and girl's empowerment in the current system that fundamentally undermines us, we want systemic change.

The root causes of food insecurity and malnutrition include colonial capitalism, the continued extraction of resources primarily in the Global South, and exploitation of Indigenous Peoples and farmers and workers of the Global South. The wealth of high-income countries, such as Australia, are a result of commodity-driven food and agriculture systems and extractive industries. However, this so-called 'wealth' is predicated upon a long history of dispossession of First Nations Peoples from lands and waters, of which sovereignty was never ceded, and slavery, including through blackbirding of South Pacific Islanders to be the workers on sugar plantations in northern Australia. Neoliberal policies of deregulation and privatization allow the continued expansion of industrial agriculture, evidenced in oppressive manifestations including land grabbing, construction of big infrastructure projects and failure to protect women's and workers' rights. To this day, female food and agricultural workers experience sexual harassment, poor working conditions, inadequate pay, and are separated from their families due to worker visa programs promoted under the guise of providing economic prosperity. The Covid-19 pandemic has challenged the free trade ideology, as global supply chains have been fractured. However, those practicing agroecology centred on local food production, short supply chains and a great degree of self-sufficiency have weathered this storm, which provides an alternative, now and in the future. Trade liberalization continues to expose economies and individuals to price shocks and 'commodity-induced poverty traps', and without addressing the impacts of free trade and international investment agreements within this policy product, the hope of achieving gender equality and women and girls' empowerment will not be realised.

To advance gender equality and women and girls empowerment, we require voluntary guidelines and subsequent public policy that serve public objectives, not privatization of public good; enable repatriation of lands and waters to Indigenous Peoples; incentivize and promote the production, distribution and marketing of food by Indigenous Peoples, small-scale food producers, especially women and youth. This is based on the necessity to guarantee basic rights such as the right to land, territories, seeds and food, to advance agroecology and achieve food sovereignty.

From a North African and Near Eastern regional perspective:

In the current regional context, rural communities suffer greater gender based discrimination. Agroecology needs to be recognized as part of the struggle to achieve healthy diets based on a real biological diversity and allowing women to reach their full potential in terms of traditional knowhow and the protection of local crops. In this sense, part 3 needs to emphasize agroecology; it should be presented as a priority to ensure that the contribution of women to food security is recognized and the full potential of women allows them to preserve their heritage and their authenticity as well.

On the other hand, when we talk about food security, we need to talk about chemicals that have become a great hindrance in the local agricultural practices within the region. It is important to see statistics on the effects of pesticides on women, how much they impact the health of women and of citizens in general. However, particular attention needs to be paid to the health of women working in agriculture as they often resort to the use of these chemicals without any real preventive measures. Among these chemicals there are often pesticides which are banned elsewhere. Some chemicals are still widespread in this region's countries as these bans reach our countries quite delayed.

It is also very important to approach agriculture in its different forms and in its diverse ways. The document currently defines agriculture as a unilateral form of agriculture which is the sedentary form of agriculture. When we are specifically talking about this region (Lebanon, Syria, Palestine, Iraq, Iran, Jordan, etc), nomadic forms of agriculture are the basics of how agriculture works. However, they have continuously been attacked and weakened by neoliberal policies or by the generic conceptions of modernization and modernity.

The document should approach agriculture to its diversity by respecting and proposing to acknowledge the different ways of agriculture, including the nomadic and Bedouin. Inherently, it should recognize the different activities and actions within agriculture, not only planting crops and the plants themselves but also animal grazing, plant grazing, foraging, and different forms of agropastoral food production.

As a result, we will be talking not only about the different agricultures but also the different cultures, arts and ways of life that are connected to these diverse ways of agriculture.

What is also happening in the region is that governments are pushing more and more to privatize the agricultural sector, which is an actual abandonment of the State to its responsibilities for the agriculture sector. Food sovereignty, environmental protection, food health, accessibility and availability to food on the one hand, and lives and security, specifically of female farmers and peasants on the other should be the building blocks of this document. It is impossible to build a productive, equitable and diversified agricultural sector in the absence of the State, and in consequence without local, regional and global agriculture policies that favour, or are biased towards women farmers and peasants which make food production, availability and accessibility a priority.

Privatization and free market, opening large markets to corporations is the magic recipe to destroy local agriculture and livelihoods of female farmers. The governments need to take responsibility for agricultural policies and reduce the dominance of the corporate discourses and neoliberal policies. An example is making farmers vulnerable to credits. In the region, or even the entire Global South, the credits have proven to be incredibly destructive for farmers (India and Egypt for instance).

The document should therefore mention food production and accessibility as a right and not as a commodity.

From a North American perspective:

In the region, we see diet related diseases and a chemical dependent industrial agriculture system that needs to be addressed as degrading soil, polluting water, pushing people away from land and actually eliminating farmers, poisoning our food and bodies with pesticides, and contributing to climate change. These problems impact severely on women and LGBTIQ+ people.

In this sense, the Zero draft does a great many things: but it does not address structural injustices. It still works within the framework of adapting to and gaining equality in an already unjust food system. Over the past year and a half, the COVID 19 pandemic has revealed painful truths about the fragility of the corporatised food sector in the U.S. In response, US administration has made some important investments and policy directives on local food systems and family-scale food providers, decentralizing food supply chains and the agricultural processing sector, strengthening competitiveness and anti-trust standards, and promoting racial equity in the U.S. food system. But we are disappointed that

these are not being reflected in U.S. government positions in multilateral policy spaces. More importantly, much work remains to be done to truly transform our food systems.

Some national programs in many countries already have initiatives to advance equality in an unjust system. For example, in the US women farmers are included as part of the category called “Emerging farmers.” This is an attempt to address the gender specific concerns they face as they are not traditionally recognized as farmers. In fact, this is also the approach we have in programs such as the “Feed the Future” that we already heard about from the USDA administrator.

However, women and members of LGBTI+ community who may benefit from these programs, continue to face other structural injustices that are part and parcel of national and global food and agriculture systems.

Through these consultations, the CFS process on voluntary guidelines must be intended to be transformative. It should aim to further advance gender equality, empowerment of women and girls, and to do so by upholding their rights and addressing the structural injustices women in farming communities and food worker communities face as they participate in food and agricultural systems that are heavily stacked against them.

Less than a month ago, in advance of World Food Day, more than 65 United States-based farmers, food and trade justice advocates delivered a letter to the Biden administration urging the U.S. government to fundamentally reorient its approach to global policy development on food and agriculture issues. This recent letter focused on a few select points is extremely relevant for this workstream. It was a civil society effort in the United States that identified some of the priorities of US civil society as key to transforming our food systems.

On war, conflict and occupation areas

We know now that conflict areas are increasing because of the world situation. There are many conflict areas now where the women and children are. And nutrition and food would be very much lacking for those women and children.

The situation of women in protracted crisis and occupation needs to be strengthened. They are in situations which affect women’s access to food in different ways, including through violence, lack of access to water and land and extreme conditions under which women work.

The document does not mention the impacts of economic sanctions, tied aid, and international coercive measures on the overall social-economic situation and the realisation of human rights in targeted countries. There is plenty of evidence to show that such measures, especially in countries and areas facing war, conflicts and occupation cause particular hardships and rights violations of women and girls. Food and essential goods become instrumentalised as weapons – complete violation of the UDR.

From a North African and Near Eastern regional perspective:

In Palestine, persecution persists due to the occupation. All activities risk arrest, especially from students and political activists. On October 22nd, the Ministry of War of Israel stated that 6 activists women from Save the Children and other bodies were considered as terrorist organizations. These organizations however work for the benefit of Palestine people. Palestine women face this kind of risks every day. The Guidelines should contemplate on how we can protect them.

On migrants

From a European regional perspective

Migration is a big situation in Europe, where thousands of migrants come in by boat or different ways, many die along the way, they are in camps...Therefore, it should be an issue of concern about nutrition and food security.

CORE PRINCIPLES AND OBJECTIVES

We welcome the Core Principles in the new Zero Draft, also agree with the Objectives for overcoming gender discrimination and ensuring women's empowerment and equal status, and with use of transformative approaches to achieve the Objectives. However, could be strengthened by identification of empowerment measures e.g. social protection funds to be given to the woman of the household, state land allocation to the female head in the household, recognition of women as head of household with rights and benefits (which is often not done), etc.

The Declaration of the Rights of Peasants and Other People Living and Working in Rural Areas (UNDROP) should be included in the normative framework, as it highlights the importance of peasant women and provides the legal basis for recognizing Food Sovereignty, which is also recognized in Recommendation 34 of the CEDAW.

The document maintains the word "empowerment", a term that, according to the CSM group's vision document (2018), could imply a downward relationship in which women are conceived as recipients of education, training and external interventions. On the contrary, there is a need to support self-determination, autonomy and decision-making power in all aspects of our lives, including the food we produce and consume.

Transformative approaches must go beyond androcentric looks, as the document only refers to the involvement of men and boys, we believe this is important, but should not be restricted to it, therefore we consider adding:

- The feminist perspective as an epistemological field of knowledge and as a political bet.
- The regenerative approach beyond adaptation and mitigation. The document states that these guidelines will contribute to "adaptation to climate change and mitigation of its effects", it is considered that the guidelines should aim at a transformative approach.
- The gender issue should not be addressed from family-centered approaches focused on improving the situation of women as the way to improve the family and to focus on what actions should be done in breastfeeding and pregnancy, but rather to think holistically and integrally beyond the reproductive role of women as mothers. Thinking about nutrition from the whole life cycle will lead to better health and autonomy.
- There is a vision that puts efficiency and productivism above women's autonomy and women's wellbeing. Of course, there is a desire for greater access to resources for women, but not above their labor rights, among others, and well-being. It is known that the problem of hunger is not because women aren't more efficient but because of inequality in the equitable distribution of resources and food, the concentration of wealth in the hands of a few.
- The document emphasizes the role of the private sector, clarifying its importance in targeting affordable and accessible healthy diets in sustainable food systems. However, it does not take into account the role of companies that must be regulated. Industry cannot be part of the discussion table on what kind of policies to implement and how to implement them. It is the industry that should be regulated and not the one who proposes its own regulation.
- The precautionary principle and the free, prior and informed consent (FPIC) of the people should be included.

From a North African and Near Eastern regional perspective:

When we come to the challenges, we need to ask ourselves why are things not happening?

First, we need to understand that the basis of the guidelines tackles Human Rights, particularly the Right to Food. However, in this region of the world, there are only a few articles in the respective constitutions which tackle these issues. There are only 2 constitutions where the RtF is explicitly mentioned. In this sense, these Voluntary Guidelines would need to make it clear that in order to apply the VGs it would be a condition to already have in place their basis, meaning the RtF in the human rights framework, if not it is going to be almost next to impossible to address the existing challenges. On the other hand, it needs to be clear that we cannot separate the RtF from food sovereignty. Food sovereignty is a political situation, and a very important issue in the region. Food sovereignty has to

do with women, particularly when it comes to food production. But also the application of food sovereignty gives a strong support to women in the region
Both of the issues mentioned above are related to each other.

PART 3

All sections from part 3 of the Guidelines have complex synergies and interplay: interventions in one section will certainly have impacts on other sections.

Section 3.1 Women's participation, voice and leadership in policy and decision-making at all levels

From a Latin American and Caribbean Regional Perspective

The participation of diverse women and girls is also truncated by socio-political violence, especially in countries of the global south where women leaders who defend the commons (water, forests and land), fundamental elements that are the source and basis of food, are being threatened, criminalized, tortured and murdered. The socio-political violence against women defenders of the human right to water, the environment and land, which is highly related, is again not taken into account. Colombia and Mexico occupy the first and second place respectively according to the Global Witness 2020 report. This situation is not included in the participation section 3.1. or in the violence against women section 3.2.

There is a relapse into the idea that women are and should be better administrators of resources so that they can better feed the members of the household. It lacks addressing the fact that the State, the community and other people in the household are to be responsible for the equitable distribution of food and the resources for it.

The document also naturalizes the fact that women tend to eat better, falling into mother-wife approaches, however, this should also be of collective care, likewise, women alone should not be held responsible for this situation given that they have fewer and fewer options to eat better, since there is an increasing supply of ultra-processed food products that affect women's health.

From an African Regional perspective

The document is too general and should be more specific on the aspect of daily participation of women. For example within rural communities and along the food systems.

Women need to be recognized in the public sphere with robust policies.

Recognition of collective women's leadership in communities is also crucial, especially since the pandemic where many women step up to feed rural and urban communities, showing that women's leadership is not an individual issue but a collective exercise.

More political training is needed so women can effectively engage in political and decision making processes. Also the involvement of young women as political actors in decision-making processes, is of paramount importance, as they produce and market food with their family and their role is key.

From an Asian-Pacific Regional Perspective

The lack of participation by LGBTI persons needs to be recognised and referred to in this section. The CSM had previously proposed the inclusion of an additional paragraph to this effect:

"LGBTI people's participation in decision making spaces is almost invisible. Sexual orientation and gender identities are often seen as an issue of the private sphere. However, considering the structural discriminations, violences and invisibility LGBTI people face, their individual and collective empowerment and active participation in policy making spaces must be addressed. Only so, they can speak up, self-contributing to transformative processes towards gender equality."

The policy areas for discussion should include structural and systemic measures and processes that enable women's participation in decision-making processes, for example publicly provided child-care, school meals, toilet facilities, safety and security for women and children, etc. Surveys and

consultations about social-economic programmes must consciously insist on speaking to women in families, not only the “heads of households.” Special attention also needs to be given to supporting participation of women in low-income women-headed households, as they carry enormous social-economic burdens

Specific case studies or real-life examples of how women's organisations can be strengthened, or cases of discrimination or gender-based violence, might need to be included in order to strengthen the section. We would suggest using examples of practices that have led to empowerment of women, transpersons, disabled and other gendered categories. Policy discourse has to be geared towards measures that can structurally empower women to address the current embedded power imbalance. Important examples are creating spaces like ensuring mothers representation in school committees, women's representation on reserved seats and quotas in local government, all government community services to have focal person for receiving violence and abuse complaints. During COVID-19, it has been shown that where there were women's social networks or whether they would go to an institution, there was less gender based domestic violence.

Missing in this section are measures for the following objectives:

- Full engagement and participation of women and their organizations in all dimensions of policy design for food security and nutrition.
- Strengthening of women's organizations and women's collective action.
- Application of positive discrimination measures, such as gender quotas

Another key aspect of leadership is methods of empowerment that include government land distribution and land titles for women so that women have the necessary confidence and decision-making space for leadership capacities.

Unless women's participation is formalized there is less likelihood of their being engaged in decision making inside the household. So a method could be that a particular percentage of women's participation must be made mandatory in public and private decision making spheres, institutions.

Education (secondary and high school) is an important element in enabling participation in organisation and mobilisation of women for collective action and leadership development. Early age marriages need to be prevented for young women to participate in political activities.

The analysis should also discuss levels of leadership and political participation other than household and global levels.

From the North African and Near East Regional Perspective

In terms of participation, 3 concepts are missing which are important:

- We don't want to talk only about leadership, we also want to talk about representation. It needs to be included
- The question of narrative is fundamental: “I need my narrative to be represented and voiced”
- Within participation there needs to be visibility; the women need to be visible.

Situation is very similar in all Arab countries. Although there is a quota in parliament, women never actually make it. The problem exists at a much earlier stage, in the education system (across all levels not only schools, also community, higher level). This point is relevant for the RtF. There is a need to engrain it in people's minds: education is important as women don't actually believe they can do it. Most of the women who are speaking in the region are a minority.

From a North American regional perspective

The women's organisations and collective action language is good because it is in movement building that the dominant structures are challenged. But, the binary language should change. Supporting movements and organisations allows grassroots leadership, development.

We need to shift away from the notion that it is kind to include women around the table, participation needs to become an important structural piece. Women's participation is part of their rights and agency. Governments' policies need to demand structural parity in the organisations and projects they are funding as a way to actually accord women in policy their rights, and not just as "at your pleasure". This will guarantee that women become decision makers in a sector where they overwhelmingly contribute to, in terms of food security and well being at household and community levels.

In this sense, it is important to acknowledge that language on participation will be fraught if the governance and policy making spaces in which women seek to participate maintain and uphold patriarchal and colonial socio economic structures (largely seen across North America). The effective participation will only happen if these structures are challenged at their core. We need to shift away from language of participation, as it would mean that women and LGBTIQ+ would want to participate in these patriarchal structures, especially in agriculture policies in the region. What we need to see is food system transformation towards food sovereignty underpinned by Human Rights and not hyper capitalist market based policies. Participation will not be enough to solve the challenges and problems we are facing around the world. It is about respecting human rights, which are women's rights, their right to self-determination over their bodies, over their communities. In turn, it becomes an issue of respecting international standards, including UNDROP and UNDRIP.

On paragraph 36: when we ask women to take leadership roles, we need to recognize that they then become targets of violence from their male counterparts or corporations. When women decide to speak out and become protagonists of their own rights, they are often speaking against something that is happening in their communities. This puts them at risk of violence and murder, and becomes a chilling effect for other women to step forward. The paragraph should be strengthened to address these issues.

Experience from Indigenous Peoples' voice:

"Indigenous women in the communities are key pillars of food sovereignty and they often face political violence and an exclusion in decision making. We might say that in the US, this doesn't happen, but it actually does. We could see it happening in Standing Rock when we - Indigenous People and allies, women included - being the backbone of the movement, were defined as terrorists for standing up for what is most important for food: water. We were criminalized and shot at for standing up for our basic rights, including our right to water and our right to food. This is about forming our food system collectively, respecting the rights of Indigenous Peoples as well and the standards that are given."

Section 3.2. Elimination of violence and discrimination against women for improved food security and nutrition

Violence against women, children and LGBTIQ is one of the worst things that can happen to anyone. And yet, violence happens every day. Especially with COVID-19 and its imposed lockdowns, domestic violence has increased tremendously. LGBTIQ persons often suffer unspeakable violence because of their gender preference.

There are many other forms of violence against women, children and LGBTIQ other than sexual violence. Poverty is violence. Lack of food and proper nutrition is violence. Life in areas of conflict is ongoing violence. Having to flee one's country because of war is violence.

Women, children and LGBTIQ suffer daily violence. They are the producers of life and food and yet they suffer the most violence. Yet they learn to live with it. They bear the pain and try to move on. But it is not enough that they continue to exist. The system has to change to eliminate violence against women, children and LGBTIQ persons.

Achieving gender equality and empowerment can be achieved when patriarchy, feudalism and neoliberal policies are done away with. In this sense, documents like Guidelines on Gender Equality and Women's and Girl's Empowerment in the context of Food Security and Nutrition can become an important document to analyze the causes of violence against women, children and LGBTIQ. Such a document can start to pave the way towards the elimination of violence against women, children and LGBTIQ.

We recognise that this section has been given greater prominence in the Zero Draft, as we had suggested in our previous Comments, given its extreme importance in guaranteeing women's rights, including the right to food. We also welcome the recognition of the climate crisis as included among the factors exacerbating the underlying gender inequality, vulnerabilities, and the risks of many forms of sexual and gender-based violence. We wish, however, to reiterate the following points:

- In connection to the climate crisis, rising violence against women environmental rights defenders must be recognised;
- Violence and discrimination against LGBTI people should also be recognised and referred to in this section. The CSM had also previously proposed an additional paragraph for inclusion in this section, to wit:
"Discrimination and the different forms of violence faced by LGBTI people in rural areas often lead them to the migration to urban areas, frequently in very young age. Instead of finding a welcoming environment, several of them are confronted with other forms of violence and discriminations, feeding the anonymous poverty of urban areas";
- UN Security Council Resolution 1325 on Women, Peace and Security should be referenced in this section.

From a Latin American and Caribbean regional perspective

The document focuses on sexual violence. It should broaden the range of violence. Economic and patrimonial violence has a lot to do with the problem of hunger, since it is women who have less land and are more economically dependent. The issue of violence should be broadened to include other types of violence from a human rights perspective.

In the policy areas of this violence component, the focus is on men and boys as the solution. The issue of violence in the context of human right to food and even Food Security cannot be reduced to this type of solution. States must rethink policies of substantive equality where there is evidence of the diverse forms of violence exercised, for example, against rural women. In the lack of access to food by armed actors and even the absence of food policies without a gender or resource approach, as well as regulating the consumption of ultra-processed foods that do so much damage to women and girls due to obesity and overweight as well as the change to corporate diets since the government encourages the consumption of these rather than real and real food that encouraged women's economic and health.

The issue of land should be fundamental, since there is evidence of patrimonial and institutional violence, and without land many women cannot access their own food and production.

From an Asia-Pacific regional perspective:

The policy areas for discussion should include institutional support for women and girls who face and/or at risk of violence and abuse, for instance safe houses, help-lines, counseling, economic means to leave unsafe places, etc. They should also recognise the discrimination and violence that women face because of gender identities and social status, including caste, religion, economic class, race, status as divorcees or widows, ownership of land, among others. Along the same lines, they should address discrimination, exploitation, and gender-based violence arising from different causes including wars, conflicts, occupations, and humanitarian disasters separately.

Household, State and systemic violence prevents women from participating.

From a North American regional perspective:

Environmental violence is violence on women. People should not have to choose what they eat because of starvation. Often the more chemicals the food has, the cheaper it is; people have no choice but to ingest chemicals that have been put into people's bodies. The Persistent organic pollutants (POPs) and pesticides are chemicals that impact women and which are passed to future generations. Not only women are polluted but also babies. This is violence not only against women but also against children. When we see how heavily North America and some UN agencies are influenced by the pesticides and chemical industry, we are concerned as this is not the solution for food, this is a false solution. In this sense, we need to include environmental and reproductive rights into this document.

Section 3.3. Access to education, capacity building, training, knowledge and information services

We are concerned about the fact that "3.3.4 Access to appropriate ICT-based, digital and innovative technologies" is given a whole sub-section, without any equivalent reference to agroecology.

The section 3.3.3. financial services would be better placed under section 3.4 on Economic Empowerment. However, when it comes to paragraph 65, the document should also be clear about the negative impacts of financial sources and the implications of debt. Family indebtedness is an important issue that also needs to be recognized. The document should promote public sources of financing for women.

From a North African and Near Eastern Regional Perspective

On paragraphs 63, 64 and 65: transportation is a serious and important part of the problem (whether it is from lack of service or because of tradition) on why women do not have access to extension services and markets, and on why they are not able to move between their work and their house. The CSM suggests to add the following paragraph to address this issue:

"To guarantee access to resources and markets by ensuring that women have access to training and outreach services. This access can be quite limited for women, especially in rural areas due to cultural and practical reasons, extension services offered by men are unacceptable in such communities, women's presence outside their homes is often difficult, also women have limited access to mobility, given that men usually have more the only vehicles than women available and public transport is not woman friendly."

On knowledge: the section still acknowledges "knowledge" as a monolithic knowledge, which comes from institutions. Specifically in this context we need to recognize inherited knowledge, supported and grown specifically by women. This includes land identification, plant foraging, production of food, and saving and safeguarding the seeds. It is also about understanding and knowing our ecology. Women who have the knowhow are very sensitive, particularly when things are changing due to pollution, global warming, etc. They can know which plants are not growing any more, which plants are changing their time of blooming, etc. In this sense it is important to acknowledge and recognize non institutionalized and binocular women's created and inherited knowledge, starting from plants, animals, insects, seeds to ecology itself.

On credits (Section 3.3.3, paragraph 65): the document needs to recognize the negative effects of credits, specially on women workers and food producers. There is a huge amount of research (qualitative and quantitative) on the destructive and negative results of credits. In this sense, the whole paragraph on credits should be deleted, and instead talk about alternative forms of financial support, which already exist (such as in Egypt, comunal financial support, or other forms of cooperatives).

From a European and Central Asian regional perspective

We think it is quite right to address the issue of women's and girls' education in the gender guidelines. There is indeed a link between girls' schooling and food and nutrition strategies. However, we are concerned about the link that the document makes between literacy and the adoption of improved crop varieties and fertilisers in paragraphs 48 and 52, as if on the one hand the objective of education is the incorporation of producers into the industrial production model. And as if this in itself were a desired objective, when it is precisely the adoption of the technological package of the green revolution that is the first step towards the introduction of an unsustainable production model that sickens the population, generates inequalities and which, we insist, is built and sustained precisely on the basis of the gender inequality that these guidelines are intended to combat.

Instead, more emphasis should be placed on the value of the knowledge of women, LGBTIQ people and indigenous peoples that we also have in Europe, knowledge that is made invisible and devalued by the current model of food production when science shows us that it is essential in the construction of sustainable, healthy food systems that promote gender equality. We believe that the guidelines should reflect that the aim of education should be to enable women food producers to freely and critically express their agency and choice, to encourage peer learning, such as "Farmer to Farmer" methodologies and based on popular education methodologies. It would be important in this section to mention young people.

The need to increase the number of women agricultural extensionists, researchers and policy makers who can approach and better understand the situation of women and LGBTIQ people in rural areas, and thus contribute to reversing the phenomenon whereby extensionists, researchers and planners work primarily with and for men, seems to us to be very appropriate. However, extensionists need to be trained in alternative production models based on agroecology, which have been shown to contribute to reducing gender inequalities and empowering women and other gender identities. Empirical evidence shows how agroecology contributes to women's income generation, financial independence, creation of their own cultural identities independent of men's, self-esteem, knowledge sharing, community building, health (of people and ecosystems), biodiversity conservation, and leadership opportunities within agroecological networks. If researchers, extension workers and policy makers are not trained in these alternative models, they become mere transmission belts for an unsustainable and patriarchal model and reduce the opportunities for women and other gender identities to build their own alternatives that promote true gender equality.

We are concerned about the role given to ICTs, and in particular to digitalisation. On the one hand, their very placement in the document, putting them on the same level as structural actions, such as social protection, and before gender-based violence. Technologies associated with digitalisation are often linked to the advance of large corporations that see farmers as clients, generating top-down technologies, with an absolute absence of participatory spaces and actions and, of course, designing technologies that do not respond to the needs of women and other gender identities, as the document itself highlights, nor respect their rights, and that generate dependence on powerful actors, deepening the industrial model that is at the root of the problem of inequality. While acknowledging that ICTs can indeed play an important role in agri-food systems, the document's approach is biased in favour of the industrial and patriarchal model. It is necessary to generate an alternative ICT model at the service of producers, co-designed within the framework of communities, that responds to the needs of producers, and that considers them as agents, not clients. There are successful initiatives in our region of which we can provide examples.

From a North American regional perspective:

On section 3.3.1: Language in the document needs to ensure that all forms of education and training are emphasized. Policy areas do not need to only emphasize higher education and vocational areas in agriculture but also alternative agriculture education that passes on traditional knowledge, Indigenous Peoples' knowledge and agroecological practices. Too many private and public universities are funded by agribusiness corporations which frame as silver bullet the agritech and chemical solutions and are

unable to provide holistic farmer to farmer knowledge to pass down through generations. Support for education and training cannot only aim to increase productivity, marketing, the ability to manage pests and pathogens, but should also aim to system shocks and the effects of chemicals, climate change and mitigation strategies. We really need these Guidelines to push for equitable and participatory farmers' science and partnerships, such as farmer to farmer field schools, participatory plant breeding, animal health clinics to respond more appropriately to the challenges that women and LGBTIQ people are facing in the farms. A push for States to invest in providing training and information at the farm and community levels from extension services, and not from the corporate players that have a financial stake in delivering education and training.

Section 3.4 Women's economic empowerment in the context of sustainable food systems

From a Latin American and Caribbean regional perspective

This section does not allude to any issue related to sexual division of food labor. In particular paragraph 76 presents a value chain or productive economy of exchange value and not of use which is instead proposed by the economies of social reproduction that evidences the economies of care and life. The latter can be a transformative and innovative approach where feminist economic theories have put forward several important theoretical and practical postulates.

There is a specific need to address the marginal earnings of women in the commercial food processes, and to recognize the drive towards an economy of competition, leaving aside sustainable and ecologically sustainable economic alternatives, as well as community, ethnic and local alternatives that can help agroecological diversity and a fair economy for women and the planet.

It is necessary to have a holistic vision of the human right to food and adequate nutrition and to highlight the various economic aspects that trace women's autonomy around food. It is important to propose an analysis as a process based on access to seeds, barter and the bank of native seeds that support and sustain the maintenance of biological diversity, the customary forms of women's exchange of seeds and agricultural products. Moreover, one cannot speak of women's empowerment without the right to land. In this sense, the role of colonialism as the root of dispossession and inequalities needs to be recognized. In addition, the patriarchal and paternalistic system qualifies over gender, ethnicity and race, which needs to be underlined to have systemic visions for the understanding of colonization in the region.

From an African regional perspective

We are generally pleased with inclusion of section 3.4 on Women's economic empowerment in the context of sustainable food systems. However, although the section acknowledges that marginalization of women regarding economic opportunities is rooted in legal inequality together with discriminatory institutional frameworks, social norms, and cultural practices, it falls short of mentioning the neoliberal world order as another reason for women's economic dis-empowerment. In the current neoliberal world order which puts profits over people and planet, creating unsustainable levels of consumption and production, degrading the environment, 90% of the world's population are impoverished and the remaining 10% self-entitled, controlling, elite, male dominated multi-national corporations have capture resources including innovation, exacerbating women's impoverishment, with severely limited endowments such as assets and power, limited agency and socially excluded. To ensure women's economic empowerment, the governance of food systems should be anchored in human rights. Food systems cannot continue to be reshaped to serve private profits, nor can they be reshaped to focus on productivity alone.

Furthermore, there are missing elements such as transforming gender power relations in access to, control of and decision making regarding productive resources, and disproportionate unpaid care workload borne by women. Male economic production in a factory for instance is impossible without women's uncompensation. As such, the guidelines policy areas for discussion should;

- Underscore the important contribution of unpaid care work to the national economy and recommend national budgetary allocations for its recognition, redistribution and reduction instead of an inexplicit ‘public investments in welfare, social protection, provision of child and elder care services, rural infrastructure’
- Instead of a generalized “investment in household technologies” highlight how targeted investment in drudgery saving appropriate technologies that are designed with the input of women and are under their control. Alternative energy like solar lighting for instance could step up women’s safety in the workplace, clean water and energy efficient cooking devices could alleviate the drudgery of domestic labor and free billions of women in the private sphere to engage in income generating activities that would improve their bargaining power in the household.
- Recommend adoption of a new metric, as a measure of economic progress instead of the gender blind GDP that only measures flows of income, economic well-being of people, which can lead to misleading indicators about how well-off women and men are and entail wrong policy decisions.

From an Asia-Pacific regional perspective:

As mentioned above, section 3.3.3 on Financial Services should be brought into this section.

The problem analysis of this section should include the social-economic impacts of industrial agriculture, intensive agriculture, land, water and territorial grabbing on women. In particular, the social-economic impacts of Free trade and investment agreements, and financialisation on women should be underpinned.

We are concerned about how the section seems to be oriented towards making women entrepreneurs and integrating them into corporate and global markets. We would therefore request that the policy areas are re-directed towards structural and legal support:

- For territorial markets along with cooperatives and societally embedded markets
- To fight back against land grabbing
- To address negative impacts of Free Trade Agreements and financialization

3.5 Access to and control over natural and productive resources

From a European and Central Asian regional perspective

Access to and control over natural and productive resources is one of the priorities for the region. In this sense, some aspects need to be strengthened in this section.

Access to natural resources and other means of production is a matter of Human Rights, as captured in Article 17 of the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas. States shall protect these rights. We can not speak about protection and promotion of human rights in the context of food security and nutrition, without naming the industrial agriculture model as the main driver of landgrabbing, soil degradation and human rights violations in the rural context, to which women and other minority genders are most vulnerable.

There should be references to the actual barriers to women’s land ownership through customary practices and more recent practices such as land grabbing from widows. The following UNDROP reference should be mentioned: *“States shall take appropriate measures to remove and prohibit all forms of discrimination relating to the right to land, including those resulting from change of marital status, lack of legal capacity or lack of access to economic resources.”*

The very binarial gender approach mentioned throughout our comments is also notable in this section. Paragraphs 87 and 88 are perfect examples of it. They reinforce the oppressive sexual division of labour and make at the same time other gender minorities invisible.

Another challenge faced by LGBTI persons are the enormous barriers, which same gender couples encounter to access the land, since in the majority of countries laws and policies don’t foresee this

kind of engagement/partnership as an option. These Guidelines should review this patriarchal approach in order to advance.

Paragraphs 87 and 88 also undermine women's knowledge, while it must rather be acknowledged, protected and supported by the Guidelines. The Guidelines also must critically address the risks of knowledge privatization and capture by private interests, because what vibrant food systems need is knowledge for public interests.

Regarding the policy areas for discussion we suggest following aspects:

- Add an area to shift the perspective on food production to include food systems, providing strong support for women's role and value in food production systems, including recognition of their traditional knowledge, appreciation of small scale food producers and family farmers, improving direct access to consumers to the benefit of small food producers and sustainable use of resources.
- Should also include the reference to LGBTI persons, because land tenure rights are often not guaranteed to them.

From an African regional perspective

Access and control over natural and productive resources is very important. A gap is existing in terms of intersectionality of natural resources towards the realization of other rights. In the Kenyan context where women are denied right to land and they move to the urban areas, often the only affordable accommodation are informal settlements. Therefore the right to land and the right to housing are strictly linked. Access to natural resources and right to health are also linked. We need to look into intersectionality and the linkage with other rights in this section.

From an Asia-Pacific regional perspective

We recognise that this section articulates in a more straightforward manner the "unsecured" land tenure and access by women, and the inequitable distribution and persistent barriers to women's land rights. We also welcome the recognition of women as custodians of knowledge of local seeds and plants and their specialized knowledge in land, water, fisheries, and forestry management and in responding to climate change effectively and sustainably. Further, we welcome the recognition of agroecological approaches and their holistic approach and emphasis on equity, acknowledging its rightful place in the discourse around the sustainability of agriculture and food systems.

We wish to stress, however, that it should be recognised that the current dominant industrial model of agriculture is a major driver of land grabs and resource degradation, depriving women of their rights to land and resources. In general, the analysis on environmental and economic impacts of industrial agriculture is lacking. Explicit reference should be made to actual barriers to women's land ownership, through customary practices and more recent practices such as land grabbing from widows.

The recognition of women's knowledge should also include reference to the need to protect and support such knowledge, particularly against the risk of privatisation and capture of this knowledge to serve private interests instead of the common good.

Land tenure rights of LGBTI persons also need to be addressed in this section.

In the policy areas for discussion, we reiterate our suggestion to include an area to shift the perspective on food production to include food systems and agency, as defined by the HLPE's Global narrative towards 2030. This would provide strong support for women's role and value in food production systems, including recognition of their traditional knowledge, appreciation of small scale food producers and family farmers, improving direct access to consumers to the benefit of small food producers and sustainable use of resources.

We also propose the inclusion of public and institutional support for agroecology and territorial governance systems with women at the centre, and public policies to prevent the contamination, degradation and destruction of land, forests, water sources/bodies, marine areas and territories. Preventing land and resource grabs by corporations and other actors should also be addressed.

The policy areas for discussion should also include public and institutional support for women to have equal rights and access as men to productive resources without any kind of discrimination.

From a North African and Near Eastern regional perspective:

The situation of occupation in Palestine is hindering the use of natural resources. In fact, the land has been grabbed and it has been used as military territory. Colonies have been created. Women's work has become very difficult in Palestine, and this is due to the application of the grabbing of resources such as water and land. Women suffer from Zionist violations and Palestinian women suffer from the blockade in Gaza due to Zionist military operations. This can be reflected in the levels of unemployment among women and young people (rates can reach 70%).

From a North American regional perspective:

An example from the Canadian context: Decades ago the Farmers Union fought very hard in the Canadian context to get women who were on family farms to get equal access and get their names in the titles of land. They were largely successful. A research carried out in a local area on land property, there were a lot of pieces of land titled to women in the municipal map of this area. In the last decade, we have seen that more and more land is being bought up by corporate players and financiers. Today, if looking at the same map there are a lot of numbered companies rather than women's names on it. The land grabbing that is happening elsewhere in the world is also happening in North America. The financialization of this land is driven by corporate and financial interests that are not owned or controlled by women. This is where women are fundamentally excluded and are not the main players.

What also happens is that when this land is owned by larger concerns and the higher management in the area this leads to a lot more intensive management of land in terms of monocultures. If we are talking about biodiversity, women's knowledge and long-term sustainability, all of these trendlines of land ownership are moving in the wrong direction. If we want to be serious about control over natural resources, we need to fundamentally challenge some of the parameters and structure of capitalisation of the land. If we do not acknowledge this, the language around training and technology for women is in some ways peripheral.

3.6. Access to labour markets and decent work

From a North African and Near Eastern regional perspective

It is important to distinguish between the labour market and decent work, because the latter has specificities according to ILO. Decent work needs to be highlighted, it is a UN notion within ILO text. If the notion of decent work doesn't appear clearly in the document then we will be failing to attach due importance to this concept. Countries need to know that decent work does not exist in the region's countries for the majority of agriculture labour. The agriculture sector is mainly made up of informal labour. The sector is not well structured, meaning that workers lack insurance (health, work, pensions etc.) and there are inequalities when it comes to remunerations or supporting women's rights. The sector itself is marginalized. We need to stress this, women bear the load of it because either they are not remunerated or for the women that work in the agricultural sector are less remunerated than men that work in the same sector. If the document does not dedicate a specific section to decent work, it undermines the notion of decent work. There is an intersection between labour markets and decent work: we need to guarantee a policy strategy and direction for our governments to ensure that women have access to markets but also to decent work. We are well aware that the region's countries are very conservative, these are developing countries and countries where women work and men earn

the money, or rather the men are paid. Tunisia has afforded credit and aid with a view to improving living conditions, however women are not in a position to benefit from this. The document should recognize that women's work is invisible when it comes to the nations' GDP. Women's work does not even show up in GDP calculations.

The agriculture sector needs to be formalized like the service sector or the industrial sector. It is important to recognize how in our region the agricultural sector is informalized, how land is distributed. It is important to talk about the so-called "green economy" and the spread of transnational companies, especially in this sector. They have an interest by attempting to impose their own organization. It is important to recognize decent work for people working in agriculture and women working in agriculture, regardless of how organized the sector is. Looking at this situation in Tunisia, Morocco and Egypt: monthly we have cases of women that get killed as they are being transported in the tractors or back of the trucks to the agricultural lands. Here it is important for the governments to be responsible for what is happening. When we talk about decent working conditions we talk about decent shelter, social protection and all this relates to food security. It is not about simply a transnational company coming and putting its hands on thousands and millions of hectares to farm these lands. Covid 19 pandemic has shown that women were the most affected.

In Tunisia in the first 6 months of full lockdown, women were the ones that continued working, so their contribution was fundamental and they have had a great contribution to the transformation of food products. The Green Economy as perceived by transnational companies is entirely inadequate because it is also a region that suffers from great water scarcity, which has become even worse due to climate change. So when these companies want to dig big wells in order to invest and cultivate the lands without taking into account the local specificities, it doesn't work and it actually becomes a greater hindrance to food security.

It is important that national strategies take into account the real needs of the local populations and how really States are partitioned and how land ownerships are divided. We are still speaking about the poorest categories of the population, categories that have been the most harshly hit by the COVID-19 pandemic.

From an Asia-Pacific regional perspective

The analysis is absent on workplace safety and security, including toilets, rest-spaces, protection against discrimination, sexual harassment and violence, etc. It is also missing the labour of girls (under 18), who take on paid work and are especially vulnerable to abuse, exploitation and sexual assault.

If the analysis recognizes that "*Agriculture is one of the most hazardous occupations given exposure to agrochemicals, machines and equipment and livestock care...*" then the remedy in terms of policy areas for this is not social protection alone, but prevention of such hazardous conditions to exist. Transformation away from chemically intensive, industrial agriculture, and industrial food processing are very important.

From a North American regional perspective

When we address the insecure workforce in North America, we need to speak about migrant workers who provide a massive amount of labour to protect Canada's food security. In 2017, one in five workers in Canada's food production was a foreign worker, yet their labour rights are not being met: lower wages, poor living conditions and no pathways to permanent residency. These are a Human Rights issue, which needs to be also analyzed through a gender lens because migrant women represent 5 to 18% of this labour force across agriculture. The sacrifices they make to ensure this low paid food production work need to be recognized and their rights need to be protected. We need to push for migrants and undocumented people to have the same rights as other residents. Food systems would collapse if it were not for migrant workers. Article 14 of UNDROP language is useful in this sense, and should be enshrined in the food systems and agriculture policies.

The Guidelines should therefore be much bolder: we need to challenge the economic and political power structures that have allowed these working conditions to exist before we can make any real change. Too many seasonal and migrant workers are invisible to the general public as they receive insufficient pay, have poor working conditions and little access to health care, they may not have legal status, and they suffer from violence. Whether a woman or an LGBTI person is a farmworker or as a worker in food transformation facilities or in slaughterhouses, raising their living wages and working conditions to their male counterparts is important but it is not enough. All of this labour, whether it is men, women, whoever, is being exploited by the neoliberal framed system, which is not working for the labourers. We need to point out the growing number of migrant workers. Agricultural policies, international trade agreements and even political sanctions have cursed Indigenous Peoples, peasants, and family farmers off the land and out of their communities to become migrant labourers. With climate change we expect millions of people across this planet who will be moving to find more work. These issues need to be addressed through the CFS in this kind of document. This is an opportunity to strengthen the CFS and create a groundbreaking document that puts in place a Human Rights framework and challenges the current political and economical power structures.

For this, we need to first ground the Guidelines in ILO conventions. This is important because in workplaces, violations continue to be rampant in factory floors despite having a treaty recognizing the right of all to have a workspace free from violence and harassment, including gender based violence and harassment. As a next step, language needs to move beyond what is already agreed in other UN documents.

There was a study undertaken in Canada on women's work in the farm and the enormous amount of invisible work that women do. Making it visible and counting the work hours were in fact a step forward. Data collection is important if one is discounted or uncounted, but it cannot only stay at that. Data does not actually change the power balances, unless the next step is taken and that work is not only recognized but also remunerated. In a more corporatized food system, less and less productive work in farms and food production is actually being remunerated adequately and corporate profits are growing exponentially. In this sense, when we speak about remuneration and recognition of the labour force, we need to speak about power imbalances in the food system and address that.

3.7 Recognition, reduction and redistribution of unpaid care and domestic work

On paragraph 111, It is not clear when talking about labor saving.

From a European and Central Asian regional perspective:

We welcome this section and also the recognition in the guidelines of increased burden of care due to covid-pandemic due to the sexual and gender based division of labour, which falls disproportionately on women and girls.

However, it will be useful to make clear the link between unpaid care work burden and the patriarchal system. The highly uneven division of unpaid care work is not a given in human societies, patriarchal structures are a root cause of it.

Despite care work being necessary to our society and to nutritional security, the patriarchal system on which our economy is based, and the assigned gender roles it in turn, places on women and girls most of the responsibility for unrecognized, and hence not paid nor compensated, care work - denying the need for redistribution between genders, nor between households and States' institutions.

That is why states must guarantee public services and universal social protection, strong health and care systems, including childcare, nursery schools, schools and leisure spaces for children; to transform the unjust distribution of unpaid care work.

On policy areas:

- 113.1: In addition to distribution between genders we need distribution between households and the state.

- 113.3: We welcome the focus on 'public investments in welfare, social protection, provision of child and elder care services, rural infrastructure', but the element on reducing the unpaid care work with "household technologies" might be misplaced and should not be at the expense of gender transformational approaches tackling root cause of gender based discrimination. Social protection should be considered as a tool to transform relations between genders, and thus to redistribute unpaid care work. [transformative social protection]

Finally we could also introduce the notion of intersectionality in this section 3.7 on unpaid care work: the burden of unpaid care work also intersects with/ is multiplied by other forms of discriminations: households most affected by the adverse impacts (for example impacts on food insecurity and nutrition) of unpaid care work are the poorest households, in need of greater economic justice through redistribution of wealth.

From a North African and Near Eastern regional perspective

Considering the different cultural contexts and economic level across regions it might be interesting to see how the issue of care has been tackled in other regions, such as Latin America or Asia (not Europe because it is a different context). For example on paternity leave, paid maternity leave. It is fundamental to give appreciation to what women do: giving it a name, giving it a context, giving it recognition. We need support from the governments and UN bodies for Civil Society and grassroots organizations to push for this agenda.

Domestic chores and care tasks which fall to women are a sort of a traditional chore to women, something they might consider as normal or a duty. However, it is not considered as a formal job, it is not even factored into the GDP. It is essential that the Guidelines reflect the fact that the decent work and the work at large that women undertake need to be taken into account. Most of this work is done according to societal norms and cultural habits, and as a perception about women's role often seen as a necessary responsibility for women. The situation needs to be better assessed.

The State has failed to assign the right value to this kind of work: nurseries, care for elderly and disabled people, all that falls into women. The State needs to take on a renewed role. All these tasks which fall to women, all these responsibilities they become an obligation, this is why we say that it should fall as a responsibility for the State, by assigning a value to the work that is carried by the women: childcare is essential for instance, it is just as costly. The State needs to bear some responsibility for this, they should follow what is stated by international agreements to attach some value to the work women undertake by recognizing that work as work and not as an obligatory task that needs to fall into women.

Women's work burden is increasing because they are asked to guarantee the right to work outside of the home, however they still face the need to ensure domestic chores. In rural areas, they need to work the land and at the end of the day they still need to undertake domestic chores. This means that women's tasks and burdens are exacerbated because they have to face both these responsibilities. Women undertake these chores because of customs and culture. They fall on women almost immediately after they are born, and they inherit this generation after generation. We need to clarify that domestic chores shouldn't be inherited. It needs to be distinct.

In rural areas, women are exploited because they cannot transport what they produce, so they are paid a lower price than they need to be paid. In Palestine they have no choice rather than to overcome these hurdles. In Jerusalem they need to go into go betweens, so that they do not have to go through military stops or checks which put their lives at risk. Israeli army sometimes carries out operations to destroy the local farmers' harvest. This adds on to an already difficult situation. Women do not only

face customs and traditions, but also an occupation which prevents them from surviving from what they produce.

The Guidelines should not dismiss the governments and States' responsibilities of the agriculture sector. Responsibility of local governments is to not submit under the pressure of trade liberalization. The guidelines need to be biased towards women food producers, who are at the center of food security.

3.8 Women and men's ability to make strategic choices for healthy diets and good nutrition

From an Asia-Pacific regional perspective

The analysis misses systemic causes of poor nutrition and unhealthy diets: availability and accessibility of healthy, nutritious foods. These causes are not only because of gender norms, but equally and perhaps more so because of increasing domination of unhealthy, ultra-processed, chemically contaminated foods from industrial agri-food systems, as well expired, spoiled foods from malfunctioning public distribution systems.

The policy areas need to address:

- Public regulation that mandates food labelling (processed and unprocessed)
- Nutrition education must emphasize local sources of nutrients
- Public interventions to ensure sufficient availability of affordable healthy, nutritious food

3.9 Social Protection and Food and Nutrition Assistance

Human rights are especially important in the design of social protection programmes and measures and all issues of the Guidelines. A quote by the SR on Extreme Poverty and Human Rights is pertinent here: *"This means defining social protection neither as an emergency response to a situation of crisis, nor as charity – but rather as a set of permanent entitlements prescribed by domestic legislation, defining individuals as rights-holders, and guaranteeing them access to independent claims mechanisms if they are denied the benefits for which they qualify. Both the mobilization of domestic resources and international solidarity should be placed in the service of this objective."*

IMPLEMENTATION AND MONITORING

Human rights dimensions must be included in Implementation and Monitoring: genuine empowerment and equality are not possible without building agency, capacity and self-determination that are embedded in the human rights framework. This part should include a proposal for indicators based on the follow-up processes of international regulations on women's human rights.

Participatory approaches and multi-actor spaces are crucial for implementation and monitoring. But we caution that multi-stakeholder platforms should have strong regulations and safeguards against conflict of interest, in order to address power imbalances affecting the voices and experiences of those most marginalized. The document should include a proposal for an architecture on the substantive participation of women in decision-making at the international level but also in the States that allows women to participate in the social control of public management in the entire policy process (formulation, implementation and evaluation) that allows the voice of women in their diversity, rural women, peasant women, women's community organizations, NGOs that work on the issue to be part of the policy decisions of the States, this allows the inclusion of the guidelines to be integrated at all subnational levels.

It must also be made clear that the different actors involved in the process do not have the same responsibilities with regard to the development, implementation, and monitoring of public policies needed for the achievement of gender equality, women and girls' rights and empowerment.

While all actors are important, within the framework of these Guidelines and that of the Committee on World Food Security, the responsibility of States as guarantors of rights as well as citizens as subjects of rights must be placed in a relevant position and be differentiated from what it means to be a mere "stakeholder".