General comments:

The CSIPM reconfirms its appreciation and the relevance of the policy convergence process “Reducing Inequalities for food security and nutrition”. Reducing inequalities for food security and nutrition is a central concern of the CSIPM’s constituencies as a prerequisite for inclusive, participatory, equitable, healthy, and sustainable food systems. As the largest international space of civil society organizations working to eradicate food insecurity and malnutrition, the CSIPM prioritizes the organizations and movements of people most affected by food insecurity and malnutrition, including those in conflict and war zones like Gaza, Sudan, Yemen, Haiti, and Congo.

The CSIPM explicitly welcomed the scope of the process as well as the extensive analysis provided by the HLPE. Especially, among others, the deep analysis of systemic drivers of discrimination and power imbalances that lead to inequalities affecting food security and nutrition outcomes. Unfortunately, the Zero Draft of the CFS Policy Recommendations on Reducing Inequalities for Food Security and Nutrition does not reflect this envisaged level of ambition.

The draft doesn’t show the connection between power structures and inequalities. It lacks the understanding that addressing inequalities would require an effective confrontation with power structures as an essential prerequisite for substantial change. Sustainable change requires understanding and addressing the systemic drivers and root causes of inequity in context. Understanding inequity and inequality involves recognizing who is marginalized from food and nutrition opportunities, as well as clearly identifying both how and why (race, caste, age, gender, disability, indigeneity, ethnicity).

Another central deficit is that contrary to the centrality of gender inequalities for the workstream as stated in the MYPOW document, gender inequalities are only mentioned marginally, and for the first and only time under rec. 31. This clearly contradicts the objectives of the process formulated at the beginning, and at the same time represents a central omission. We’d rather call for a mainstreamed gender transformative perspective throughout the whole document.

The HLPE report made a consistent and important effort to adopt an intersectional perspective as a prerequisite for the reduction of inequalities. For the CSIPM, an intersectional lens for the analysis of inequalities remains of central importance, as was also demonstrated at the side event at CFS 51. This side event was well-attended, and included the participation of governments from the Global South who underlined the importance and practical application of this framework.

However, the draft now completely lacks a coherent framing / framework which connects the different issues addressed. The recommendations rather read as titles or phrases than specified recommendations that provide actual guidance. We recommend applying a much more specific,
action-oriented language that provides guidance for Member States and all other stakeholders willing to tackle inequalities in food systems.

Contrary to what is stated in the rationale, we do not see any consistent application of a human rights perspective and the associated internationally agreed human rights language. An example of this is the need to make the distinction between duty bearers and rights holders. The entire document should be reviewed and revised to include this aspect.

From our perspective, policy recommendations aiming to reduce inequalities should be designed in such a progressive way that they make a substantial contribution to the 20th anniversary of the Voluntary Guidelines on the Right to Food – especially against the backdrop of growing social, political, and economic inequality worldwide, in countries of both the Global South and North, and the associated violations of the human right to food.

Against the backdrop of the increasingly large number of violent conflicts and wars worldwide, which are costing countless human lives and dramatically exacerbating hunger by weaponizing food, starving people and creating needless famine, it is absolutely inexplicable why neither the impact of wars and conflicts on inequality, nor the CFS Protracted Crisis Framework for Action (CFS-FFA) is reflected in the zero draft. We therefore ask to add a paragraph on recommendations to reduce inequalities for food security and nutrition by applying the FFA. The CFS has previously agreed that protracted crises require special attention, and that appropriate responses for these contexts differ from those required in short-term crisis or non-crisis development contexts. For a meaningful impact on reducing inequalities, the policy recommendations must promote the application of the CFS-FFA. It needs to be emphasized that the underlying causes of protracted crises such as conflict, occupation, terrorism, man-made and natural disasters, natural resource pressures, climate change, inequalities, prevalence of poverty, and governance factors need to be addressed. Unimpeded, safe, and rapid access to affected communities must be guaranteed in order to provide humanitarian food and livelihoods assistance in all situations of conflict, occupation, terrorism, or man-made and natural disasters.

The CSIPM is convinced that even if fully implemented, the draft policy recommendations would not tackle inequalities in any significant way. These draft recommendations cannot possibly be the basis for the negotiations, and require a fundamental revision based on the following summary. They must go beyond the confirmation of the status quo and make positive policy recommendations.

The following is an overview of the results of the collective CSIPM analysis according to the current structure, with a focus on the identification of gaps. Filling these gaps to carry out a meaningful policy convergence process that meets the requirement of reducing currently manifested inequalities and going beyond a confirmation of the status quo is the declared aim of the CSIPM.

RATIONALE

For the Rational section, it is essential to lay out a consistent framing containing the above-mentioned elements. Without a strong and clear framing, the document risks becoming a random list of single actions, which may all be important, but do not constitute a coherent whole. We strongly recommend building on the conceptual framework outlined and presented in the HLPE
report. It describes how inequalities in FSN outcomes are best reduced by addressing inequalities in food systems and in other related systems. Sustainable change requires understanding and addressing the systemic drivers and root causes of inequity in context. Understanding inequity and inequality involves recognizing who is marginalized from food and nutrition opportunities, as well as clearly identifying both how and why.

We especially recommend using the framework of understanding the way in which inequity is **intersectional** (inequalities interact and compound each other), **intergenerational** (inequities are passed on over time), and **interterritorial** (inequities are spatially and geopolitically determined). The framework presented by the HLPE report for addressing inequality and inequity very much reflects the CSIPM’s core values and principles and should be applied in the report. Accordingly, actions must work through processes of **recognition** (acknowledging the specifics and history of inequity in each context), **representation** (ensuring that marginalized groups are genuinely empowered to have agency over the choice of actions to address inequity), and **redistribution** (ensuring that resources and opportunities are allocated fairly and that costs do not fall on those with less political and economic power but rather are supported in a just and equitable manner). Actions to address inequalities in FSN outcomes and the inequities that underpin them should work through human rights and justice principles and consider the range of different knowledge and evidence available in framing issues and actions.

As presented above, a **transformative gender equality perspective** should be clearly introduced in the beginning and laid out throughout the document instead of being left out or confined to a small section. It is essential that the rationale refers to all constituencies, including peasants, of the CSIPM. In terms of clear language, we advocate speaking of marginalized groups and naming them explicitly. Very practically, it is necessary to use capital letters for Indigenous Peoples, and make sure they are mentioned distinctively from “local communities”. This is also applicable to the various forms of discrimination, for example based on race, caste, ethnicity, gender, age, and disability.

A clear naming of grievances, such as the violation of the right to food, is also necessary as a problem statement – instead of using vague, unclear language such as “reducing people's life chances” or “lost opportunities”. This language does not represent the real struggles of peoples around the world but rather upholds the persistence of existing inequalities. Instead,

It is to be welcomed that the draft already recognizes and points to corporate and wealth concentration in the beginning, since it is one of the primary causes of inequities. But for a comprehensive problem statement, the recognition of growing poverty in many countries, in the Global North and South, and the lack of governmental action to reduce these inequalities, e.g. through social programmes and political regulation, needs to be acknowledged. We also miss the ambition of reducing inequalities within and between countries that has been applied in earlier documents of the process.

The rationale section is also missing the reference to the 6 pillars of food security of the HLPE, which add agency and sustainability, and the key reference to the right to food. It equally misses the reference to human rights obligations as well as obligations regarding climate and biodiversity and previous CFS products on gender, youth, agroecology, responsible investments, and governance of
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- It is important to not only claim access but also control over resources such as land, seeds etc. The understanding must go beyond ownership to address full consideration of access and control particularly for women and Indigenous Peoples. Challenges regarding land ownership such as land tenure, unequal distribution of land, gender disparities, power imbalances as a driver for unequal land distribution need to be tackled (Rec.1).

- Reference to trade, investment and debt governance, subsidies related to food security and nutrition being mentioned for the first-time in a CFS product would be of great value for the outcome of the process. We would very much appreciate the CFS in their communication and proposals of policy recommendations to make it clear towards member states that there’s a difference between CFS taking decisions on issues on which other international spaces are the mandated decision-making spaces (e.g. debt relief, trade etc....) and CFS providing input on the implications of these issues regarding food security and nutrition which can then be taken into account in decision-making in other spaces.

- Furthermore, it is essential to address the influence of neoliberalism and market driven approaches which exacerbate inequalities across class, caste, and countries. We urge the CFS to support policies that reduce market concentration and financialization in the food sector and instead promote local food systems and redistributive policies that help overcome indebtedness and the establishment of fair and equal trading systems.

- We welcome the mention of agroecological and other innovative approaches but the location (under innovations into value chains) is not sufficient. Rather, the potential of agroecology for reducing inequalities (as presented in the HLPE) should be highlighted in the policy recommendation.

- Use intersectionality as a guiding principle to engage with inequalities, marginalized groups and power relations in a complex way.

- Social and Solidarity economy helps by ensuring decent work and also by helping people to move from informal to formal work and supports social justice. Over 30 States/regions already have legislation. In terms of ways of supporting food justice it is a very significant lever, from providing school dinners to children to inclusive employment and collective wealth and community economic development and supporting territorial markets, direct food chains from producers to consumers etc. (Rec. 6).

- It is important to develop specific proposals pertaining to Climate Change and Biodiversity Loss particularly in reference to those most at risk in not having their right to food met. Specifically, inequalities related to gender, persons with disabilities, Small Island Developing States (SIDS) and other regions in the Global South like Africa. Promote financial responses like Loss and Damage, build on the inclusive policies in FAO Global Roadmap for Achieving SDG2 without Breaching the 1.5c Threshold, and the COP28 Declaration on Sustainable Agriculture, Resilient Food Systems, and Climate Action.