

Compilation of CSM Observations on the 3rd draft of the CFS FFA

General Observations

1. Although the content is tighter, more readable / organized, less redundant there are unfavorable changes in the character of the document :

- i. **The document changed from a framework for action to a set of "principles" for action with no distribution of roles. This is made evident throughout the document:**
- Elimination of the action plan which was replaced by another section with a different title (Dissemination, Application and Learning) and a diluted content.
 - The *objective* and *purpose* (paragraphs 8, 9) where the term "CFS-FFA" changed to the word "principles" weakening the formulation from an action point to mere ideals.
 - The entire wording of new paragraph 10 under *purpose*
 - The heading 'Principles for Action' was reduced to 'The Principles.'
 - The old draft describes which stakeholders are responsible for which actions. The new draft does not. There is a problem in clarity and consistency.

Main recommendation: Bring back the action orientation through strengthening the action section and providing clear distribution of roles.

- ii. **The Human Right Based Approach has been degraded.** It is no longer consistent with the international discourse calling for tripartite alignment of humanitarian (short term), development (long term) and human rights (consistently both preventive and remedial) approaches. It omits the third pillar of the harmonized approach making the FFA a reactive instrument, with more focus on recovery and less focus on prevention.

This is shown by the:

- New order of principles where the IHL& HR framework moved from principle 1 to 4
- The change of the heading to "protection" from "comply with IHL &HR..." It is important to note that governments have three levels of obligation: to respect, protect and fulfill.¹

¹ It is important to note that governments have three aspects of obligation: to respect, protect and fulfill every right. To respect a right means refraining from interfering with the

- This principle is categorized as principle that is relevant to adapting to specific challenges of protracted crises situations, although it is an overarching principle, in addition its relevance to adapting to specific challenges, it addresses manifestations and surely contributes to resolving underlying causes.
- The lack of reference to the human rights based approach which is key to maintaining consistency with the objectives of the agenda.

Main Recommendation: Reset principle 4 on Protection as the first and overarching principle

iii. Narrowing the scope of the document

The document is now more focused on addressing food insecurity in protracted crisis, but this implies the risk that the scope of the document is reduced to food security interventions in situations of protracted crises. This tendency towards a too narrow scope should be avoided, considering that a holistic understanding of the causes of food insecurity in situations of protracted crisis is needed. It is clearly the mandate of the CFS to ensure coherence of policies and measures with direct and indirect impact on food security and nutrition in situation of protracted crisis. The Framework for Action should contribute to the coherence of these policies and measures, which includes, but goes beyond food security interventions in situations of protracted crisis.

2. Most negotiated text in blue has remained but much has been relocated changing the purpose of the text.

(e.g. Principle 1 and 4)

3. Main terms between brackets

Main concepts between brackets remained except occupation in new paragraph 4 (old paragraph 3).

Recommendation: Reinstate (occupation) in paragraph 4, maintain it in principle 4, and maintain (extraterritorial obligations) in the nature and scope.

4. Text in orange has been removed

Recommendation: Reinstate old (iii) principle 2 of the second draft.

enjoyment of the right. To protect a right means to prevent other parties from interfering with the enjoyment of rights. To fulfill a right means to take active steps to put in place, laws, policies, institutions and procedures, including the allocation of resources, to enable people to enjoy their rights.

Observations on Structure/Content

Introduction

- **In Stakeholders :**
 - Re-instate political , peacebuilding and peacekeeping missions
 - Re-instate parties involved in conflict in protracted crises situations
 - The chapeau of paragraph 15 restricts out stakeholders that impact food security and nutrition but not necessarily "improve it".

Recommendation: Adding few words to the text as follows:

"The intended users of the principles are all stakeholders **impacting or** with a role in improving food security and nutrition... "

- The definition of 'smallholders' in the annex need to incorporate the landless.

Principles:

- There are unnumbered sentences between the principle heading and the bullets that can be integrated back in to the heading (e.g. principles 1,2,4 ,5.etc)

Principle 1 Meet immediate humanitarian needs and build resilient livelihoods

- Strengthening local food systems should be a main element of this principle:
 - The phrase "and food systems" –should be added back in to the heading as in Draft 2
 - "strengthening local food production and markets, trade consumption" was dropped and should be reinstated
 - Possible ways to support local farming systems such as infrastructural development and recovery, access to inputs such as credit, seeds , energy, fodder and fertilizers as well as improving technologies and storage capacities should be incorporated
- Repatriation and return to place of origin as an option of durable solutions should be added back, where by the following bullet was introduced (iv) "understanding the effects of urbanization and protracted displacement and supporting sustainable adaptation and transformation of livelihoods"
- Reference to the "establishment of community, national and regional food reserves" and the importance of local procurement (local purchase from local farmers) should be re-instated.

Principle 2 *Focus on the nutrition needs of vulnerable and marginalized groups*

- More focus on food safety is needed.
- This principle needs to include a more holistic view on nutrition by including concepts such as care practices; universal and free access to community-based management of acute under nutrition as part of Universal Health Coverage;
- Reference should be done to ICN2 and the World Health Assembly nutrition targets.

Principle 3 *Reach affected populations*

- This principle should come after principle 4 in order
- Add text “Ensure unimpeded and safe access to provide or to facilitate affected communities access to humanitarian food and livelihoods assistance”
- A statement should be inserted on "food shouldn't be used as means of political and economic pressure.

Principle 4 *Ensure Protection*

- *Protection* as a heading is not sufficient. The title should incorporate "respect, protection, and fulfillment of IHL and HR"

Principle 5 **Ensure and support comprehensive evidence-based analyses**

- We must add "to inform policies and actions" to the end of bullet (vii).
- Add to (ii) ability of local markets to withstand shocks and support cash transfer programming in times of crises

Principle 6 *Strengthen participation and accountability*

- Add the word "and country ownership to the heading"
- Bullet (iii) of old principle 2 was dropped and should be added back for discussion "cooperation partners should coordinate and align support with national policies and actions for food security and nutrition as developed through country owned multistakeholder and multi sectoral platforms and processes"
- The explicit mention of "accountability to the local population" was removed.

Principle 7 *Promote effective financing*

- Cooperation partners should prioritize using local resources when implementing projects. This way the aid given will have much larger impact on the economy than the original spending.

- Reference should be made on avoiding aid coming in the form of loans and increasing indebtedness of countries.
- Include in the end of (i) “including through pooling funds that, in case of slow onset crisis, are automatically released according to changes in early warning indicators or triggers; “

Principle 8 *Contribute to peacebuilding*

- Reference to the do no harm framework/principle has been deleted and should be put back in the chapeau of this principle.
- It's essential to add reference to the Human Rights Based Approach in this principle.

Principle 9 *Manage natural hazard risks and use natural resources sustainably*

- The old heading of this principle (“*Manage scarce natural resources to ensure food security and nutrition of affected populations and to address underlying causes of protracted crises*”) clearly mentions the purpose of this principle. The new principle heading and content does not reflect the "prevention" element of this principle and rather uses the introductory statement "mitigate the effects of natural disasters and promote sustainable use of natural resource"
- Protection of land and water tenure has been degraded in this principle (there is no mention of VGTF, VGSSF)
- Inclusion of possible methods of enhancing resource conservation and efficiency through techniques such as water harvesting, deployment of renewable energy, setting up seed banks
- Including a reference on agroecology.

Principle 10 *Improve governance*

- Drop the word "competitive" in (iv).
- No need to single out "pastoralists" in (v).
- Add words in (ii) "avoiding to increase debt or reinforce dependency..."
Adding a reference to supporting "social solidarity systems" in (iii)

Dissemination, application and learning

- There is no distribution of roles.
- There is no mention of which UN bodies should be involved (UN specialized organizations, UN HR System, Special Procedures particularly the Special Rapporteur on the Right to Food/the HLTF on the Global Food Security Crises
- Monitoring is sidelined – we suggested adding a statement: "Governments and all relevant stakeholders commit to report about progress and limitations of the application of these principles to the CFS plenary session on a regular basis, within the context of the CFS monitoring mandate."

