



Comments on the Zero draft of the CFS VOLUNTARY GUIDELINES ON GENDER EQUALITY AND WOMEN'S AND GIRLS' EMPOWERMENT in the context of food security and nutrition

Gender in Aquaculture and Fisheries Section of the Asian Fisheries Society (GAFS)

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General Comments

The Gender in Aquaculture and Fisheries Section of the Asian Fisheries Society appreciates the opportunity to provide feedback on the Zero Draft CFS Voluntary Guidelines and welcomes that such a gender equality Guideline is being developed. The Zero Draft is already developing as a very valuable document. To help in producing the next draft, we offer the following responses to the four questions. Our responses are mainly focused on fisheries and aquaculture value chains but we also make some broader points.

- ***Does the Zero Draft appropriately capture the main challenges and barriers that hinder progress in achieving gender equality and the full realization of women's and girls' rights in the context of food security and nutrition? If not, what do you think is missing or should be adjusted?***

1.1 The Background and Rationale, while adequate in what it covers, this section does not recognise that women and girls are often adversely impacted by changes in the food systems, and that they have no role or representation in decisions affecting these changes. We agree that empowering women, systematic mainstreaming, increasing production and efficiency, investing in women and girls, addressing discrimination and violence against women are all important. However, no attention is given to the political economy of food systems. When food systems are transformed to become more strongly market-focused systems, or attuned to exporting or into the many forms of modern, commoditised food systems, many women are inadvertently, or sometimes deliberately, negatively affected. The upscaling of operations rarely advantages women, and often the reverse, e.g. see Kruijssen et al., (2018)¹ on aquaculture value chains. Industrial commoditised value chains employ many millions of women (and men) in new modes of working, often having displaced many others who worked in earlier value chains, perhaps in other locations. Commoditisation often shifts ownership and control more or even totally towards men (Schumacher, 2014)².

1.2 Objective of the Guidelines are mainly procedural and process oriented. They would benefit from a more uplifting goal on actual outcomes that the processes will help achieve.

¹ Kruijssen, F., McDougall, C.L. and van Asseldonk, I.J., 2018. Gender and aquaculture value chains: A review of key issues and implications for research. *Aquaculture*, 493, pp.328-337.

² Schumacher, K.P., 2014. Gender relations in global agri-food value chains—a review. *DIE ERDE—Journal of the Geographical Society of Berlin*, 145(3), pp.127-134.

1.3 Nature of the voluntary guidelines and their intended users. Under 16(e), we recommend adding “professional societies”. Our own organisation is a professional society group devoted to gender equality in aquaculture and fisheries. We have a global membership, and for 30 years, including our less formal earlier years, have been conducting conferences, publishing research, maintaining a rich website and very active social media campaign (<https://www.genderaquafish.org/>, <https://www.facebook.com/AFS-Gender-in-Aquaculture-and-Fisheries-181176555231544/>, @Genderaquafish on Twitter).

- ***Does Part 2 of the Zero Draft satisfactorily reflect the core principles which should underpin the Guidelines? If not, how do you propose to improve these principles?***

Part 2: 17. We suggest adding: Voluntary Guidelines for Securing Sustainable Small-scale Fisheries in the Context of Food Security and Poverty Eradication (SSF Guidelines). These Guidelines contain references to gender equality, and are the first fisheries international instrument to do so. We would also suggest naming some ILO instruments such as C.100 and c.111.

21. Gender Transformative Approach. Should this also refer to gender minorities rather than taking a purely binary approach?

19.-29. We would suggest reordering these principles somewhat to bring up much higher in the list the issues of budgeting (29), data (25) and diagnostics (23). At present, they are lost down near the tail of the list, yet they are essential early stepping stones to achieving anything.

- ***Do the nine sections of Part 3 of the Zero Draft comprehensively cover the policy areas to be addressed to achieve gender equality and the full realization of women’s and girls’ rights in the context of food security and nutrition? If not, what do you think is missing?***

37. Policy Areas for Discussion. This section does not adequately cover having women represented and part of decision-making when high level political economy decisions are made that will greatly affect their existing businesses and opportunities. For example, in West Africa, women fish processors are now politically active because they are losing access to fish when governments make key political decisions to allow foreign fishing vessels catch and send the fish to value chains other than the domestic ones on which they rely. In making the political decisions on who has access to the fish, governments have not been taking the women’s business, labour, food and food security dependence into account, and the women are not consulted in decision-making.

For further guidance, the drafters may wish to also use materials from the 2014 HLPE CFS study on fisheries and food security, as this also contained advice on gender, which we reproduce here:

pp. 96-7, HLPE (2014)³

States should

7a) Ensure that their aquaculture and fisheries policies and interventions do not create negative impacts on women and encourage gender equality.

7b) Enshrine gender equity in all fisheries rights systems, including licensing and access rights. The definitions of fishing must cover all forms of harvest including the forms typically practised by women and small-scale operators, such as inshore and inland harvesting of invertebrates by hand and the use of very small-scale gear.

The **FAO Committee on Fisheries (COFI)** should

³ HLPE, 2014. Sustainable fisheries and aquaculture for food security and nutrition. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome 2014.

7c) Develop policy guidance on gender equality and economic contributions, e.g. technical guidelines on gender in aquaculture and fisheries within the Code of Conduct on Responsible Fisheries.

The **CFS** should

7d) Urge international and national fish sector organizations to fully address the gender dimension of the fishery and aquaculture sectors in their policies and actions to overcome the unintended gender blindness of present approaches.

Development assistance programmes should

7e) Be gender-aware and give priority to gendered projects.

3.5 Access to and Control Over natural and Productive Resources.

In 95, access to fishing areas and fisheries resources are not covered, but only aquaculture is mentioned. Just as for agriculture, the technologies used are designed without due consideration of and engagement with women in co-design. We suggest rewording 95 as:

95. Problem statement: *Women have less access to agricultural, fisheries, livestock, forestry and water inputs, improved technology, and mechanized tools.*

We suggest adding a new point after 97, as follows:

“XX. Women and men often fish in different aquatic ecosystems, catching different species. Women’s fishing is more likely to be for subsistence and household food security. As this fishing is usually not recognised formally, women’s and also men’s access to fishing areas and their resources may be tenuous. Governments at all levels should formally acknowledge and protect the rights to such resources, and work with the communities to maintain healthy aquatic resource systems.”

After the current 97, we suggest adding a topic that refers to value chain resources. The present topics are more limited to the land and primary resources, and not the derived resources in the value chains – such as local markets, market relationships and networks, food processing and trading space and customers and consumer. These are just as critical to many women as the primary resources.

3.6 Access to Labour Markets and Decent Work

101. This para should also refer to the stereotyping of women’s work, and the lack of representation in workplace decision-making, plus structural problems that can make it difficult for women to take paid work.

102. & 103. Are very focused on farm and agricultural labour, overlooking fisheries, aquaculture, forestry and water sectors.

106. Policy areas for discussion: this should also include that employers fully comply with legal labour requirements, e.g., for factory work, migrant workers, etc.

3.7 ...Unpaid and Care Work

108. The “many other activities” include increasing amounts of environmental stewardship work that is given, usually unpaid, to the women, such as planting and nurturing mangroves in coastal areas.

3.8 ...Nutrition

This section seems to put a lot on women’s shoulders rather than on the more integrated household where all members have responsibilities.

3.9 Social Protection

130. A particular problem for women in fisheries communities and work is that they lack formal work registration. This, plus their care duties, often mean that they are not on any government registers of those people eligible for assistance. Direct cash and other transfers to women and girls have been shown in numerous development programs and studies to be among the best ways of helping women and households. This should be included.

- ***Does Part 4 of the Zero Draft provide all the elements necessary for effective implementation and monitoring of the use and application of the Guidelines? If not, what do you propose to add or change?***

Can states be encouraged to use elements of the Guidelines in their reporting to the OHCHR Committee on the Elimination of Discrimination against Women? An expert group would need to develop a reporting framework for such a practice.

Additional Comments

- Wherever possible, the full list of sectors being referred to should be given. Often, agriculture is used as a shorthand.