

CFS Principles for Responsible Investment in Agriculture and Food Systems - First Draft Proposal of the “Coalition Contre la Faim” (CCF) for a CSM position in the perspective of the negotiation in May 2014 (25.04.2014)¹

Through the Civil Society Mechanism (CSM), the Civil Society Organizations (CSOs) thank the Committee on World Food Security (CFS) for the First Draft of the Principles for Responsible Investment in Agriculture and Food Systems (hereafter “the Principles”). We acknowledge some improvements compared to the Zero Draft, in particular with regard to the structure of the Principles, their anchoring in relevant human rights instruments, a better recognition of the importance and key roles of small-scale producers with regard to food security and the realization of the right to adequate food, and a better distinction of the respective roles and responsibilities of the different actors. However, the First Draft remains far behind our expectations as expressed during the consultations conducted at the global and regional levels. It remains much too vague and general, failing to formulate sufficient concrete recommendations in terms of specific actions to be carried out by the different actors, thus failing to provide adequate guidance for making investments truly more sustainable. Based on CSOs assessment of the First Draft, this document aims to present the CSM priorities in the perspective of the May negotiation.

(1) Strengthening the anchoring of the Principles in relevant human rights instruments

Although CSOs welcome the better anchoring of the First Draft in relevant human rights instruments compared with the Zero Draft, important instruments are still missing and need to be added. These include especially: the International Convention on the Elimination of all forms of Racial Discrimination (ICERD), the International Covenant on Economic, Social, and Cultural Rights (ICESCR, particularly art. 6-8, 11, 12), the International Covenant on Civil and Political Rights (ICCPR, particularly art. 6), the Convention on the Elimination of all forms of Discrimination against Women (CEDAW, particularly art. 14), the ILO Convention no. 169 on Indigenous and Tribal Peoples (particularly art. 13-16), and the International Treaty on Plant Genetic Resources for Food and Agriculture (ITPGR). Moreover, there should be reference to those instruments whenever necessary in the rest of the document. Given its importance and relevance with regard to sustainable agriculture, the First Draft should also include a reference to the International Assessment of Agricultural Knowledge, Science and Technology (IAASTD).

⇒ Specific changes should include among others:

- Adding references to the above mentioned references (including the IAASTD) in current paragraph 21;
- Adding specific reference to the right to food in the Principle 1 (on which the other Principles are based) ;
- Including specific reference to the ITPGR in the Principle 7 (“Respect for cultural heritage and traditional knowledge”; paragraph 30).

¹ At the global level, the Civil Society Mechanism (CSM) still needs to further develop its positions and proposals on the First Draft of the rai principles, and prepare for the negotiation in May. The following position of the CCF (« Coalition Contre la Faim », coalition of Belgian NGOs) represents an input, among others, in this regard. It is based on previous positions adopted by the CSM through global and regional consultations conducted since May 2012, including for participating to the negotiation on the Terms of Reference of the CFS rai process adopted in October 2012.

(2) Improving the normative nature of the Principles

The First Draft still looks like a definition of what ‘responsible investments’ are, while the language should be more normative, indicating what all investments are expected to do or not to do. More precisely, instead of defining ‘responsible investments’, the Principles should recommend what all ‘investments’ (in general) should achieve (and avoid) for securing the progressive realization of the Right to Food with regard to the different sustainability criteria. Then, the section devoted to roles and responsibilities should include both what the respective actors should do and should not do in this regard.

Specific changes should include among others:

- Instead of consisting in definitions of “responsible investments” (starting by “*Responsible investments in agriculture and food systems*”, the 10 principles should consist in recommendations of what all investments should do and/or avoid doing (starting by “*All investments in agriculture and food systems should*”);
- The normative language should be harmonized throughout the document (using “should” more systematically, e.g. rather than “*are encouraged to*” in some paragraphs).

(3) Contributing to a secure and adequate access to land and other natural resources

The CSM welcomes the inclusion of a specific Principle devoted to the respect of tenure of land, fisheries, forests and water (Principle 5), and in that context the reference to the application of the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT). However, rather than just referring to the VGGT, the Principles, as it was agreed in the VGGT negotiations, should go much further and seek to fill their gaps, in particular by including:

- a clear condemnation of land and other natural resources grabbing practices and relevant recommendations for preventing them (notably as a complement to section 12 of the VGGT), including notably a commitment by companies to a zero tolerance policy on land and other natural resources grabbing in their whole value chains through their buying practices or their investment portfolio. A zero tolerance policy should be adopted also by all governments and international organizations;
- relevant recommendations for investing in redistributive agrarian reforms to address historic dispossession of land and other natural resources, unjust and discriminatory tenure patterns, and land concentration to which landless people, women, indigenous peoples, pastoralists, ethnic groups or fishers have and are being subjected to;
- relevant recommendations for acknowledging and protecting the natural commons².

Specific changes should include among others:

- In principle 5 (“Respect tenure of land, fisheries, forests and water”), paragraph 28:
 - Adding the need to protect, or at least not undermining, the common (after the recognition and respect of all legitimate tenure rights, and of common property);

² The ‘natural commons’ comprise farm/crop lands, wetlands, forests, wood-lots, open pasture, grazing and range-lands, hill and mountain slopes, streams and rivers, ponds, lakes and other fresh water bodies, fishing grounds, seas and oceans, coastlines, minerals, terrestrial and aquatic biodiversity. See for example See FIAN International. (2011). *Civil Society Organizations’ Proposals for the FAO Guidelines on Responsible Governance of Land and Natural Resources Tenure*. Available <
<http://www.foodsovereignty.org/Portals/0/documenti%20sito/Home/News/CSO%20proposals%20FAO%20land%20Guidelines%20EN.pdf>>

- Adding (through a sub-point iii) a reference to the adoption of complementary safeguards to avoid any form of land, water or other natural resources grabbing
- Under Roles and Responsibilities of States, adding the following sentence at the end of current paragraph 37: “*Both home States and host States have roles to play in ensuring that land investments do not contribute to abuses of human rights and legitimate tenure rights*” (inspired by paragraph 3.2 of the VGGT).
- Under Roles and Responsibilities of States, including in current paragraph 41 the following recommendation: “*States should implement a zero tolerance policy on land grabbing, notably by implementing the Voluntary Guidelines on Responsible Tenure Governance*”;
- Under Roles and Responsibilities of Private Sector Enterprises, a new, additional paragraph (for example after current paragraph 49) should be added, with appropriate language, to call upon large private enterprises to commit to and implement a “*zero tolerance policy on land, water and other natural resources grabbing*” (CSOs will work on a proposal for the wording of such additional paragraph).

(4) Respecting farmers’ rights to seeds

Despite their crucial importance for food sovereignty, food security and the realization of the right to food, and sustainable agricultural approaches, the First Draft barely address the issue of farmers’ rights to seeds (see the Principle 7 – “Respect for cultural heritage and traditional knowledge”). In line with the recommendations adopted at CFS 40 on “investing in smallholder agriculture for food security and nutrition” (consistent with the outcome of the fifth session of the Governing Body of the International Treaty on Plant Genetic Resources for Food and Agriculture –ITPGR- in September 2013), the Principles should call upon all actors to respect and States to protect the rights of small-scale producers to access, breed, produce, conserve, purchase, exchange, sell and use the seeds they need, including local, indigenous and modern varieties. In the same line, the reference to the commercialization of cultural heritage should be removed.

Specific changes should include among others:

- Putting the language related to farmers’ and breeders’ rights to seeds in consistence with the internationally agreed language of the ITPGR, notably in the Principle 7 (affirming explicitly “*farmers and breeders rights to access, breed, produce, conserve, purchase, exchange, sell and use the seeds they need, including local, indigenous and modern varieties*”);
- In terms of Roles, Responsibilities and Application, include specific language calling upon States and the Private Sector to respect their obligations with regard to farmers and breeders’ rights to seeds, here again in consistent with the internationally agreed language of the ITPGR (e.g. in paragraph 41 for States, and paragraph 52 for the Private Sector);
- Deleting the reference to the « *commercialization of cultural heritage* » in Principle 7 (paragraph 30).

(5) Strengthening local food systems

Despite the crucial importance of local food systems for achieving food security and meeting sustainability challenges (e.g. with regard to food availability, accessibility and adequacy, or climate change mitigation), the First Draft does not mention even once the need to strengthen them, including only a very weak reference to the possibility for States to consider local procurement (paragraph 44, in the section “Roles, Responsibilities, and Application”). On the contrary, the Principles should call upon States to support local food systems, both by prioritizing support to domestic food systems over international markets and protecting small-scale producers from cheap food imports undermining their

outlets on domestic markets, and by supporting the development of ‘short circuits’ (including through public procurement schemes) that reduce the distance between consumers and producers, such as producer-consumer networks, collective producer shops, farmers markets, box schemes and other alternative agri-food networks.

Specific changes should include among others:

- Include reference to the idea of “prioritizing local food systems” in Principle 1 (“Contribute to food security and nutrition”) (through an additional sub-point in the principle; see our proposal of a new, additional sub-point iv, hereafter in the point 7 of this note – “Improving the conditions in which small-scale producers connect to markets”);
- Calling upon States to strengthen local food systems in the section on Roles, Responsibilities of, and Application by States. E.g.: in current paragraph 41, after the 1st sentence, the following sentence could be included in this regard: “*This includes specific measures to strengthen local food systems, including by supporting the development of ‘short-circuits’ that reduce the distance between consumers and producers, such as producer-consumer networks, collective producer shops, farmers markets, box schemes and other alternative agri-food networks.*”;
- Strengthening the language related to local procurement in current paragraph 44 => Replacing “*may want to consider procuring locally*” by “*should increase local procurement aimed to support small scale food producers*”.

(6) Supporting the scaling-up of agroecological approaches

An extensive body of evidence demonstrates how efficient scaling-up of agroecological approaches³ can contribute to make agricultural and food systems truly more sustainable and farming systems more resilient to economic or ecological shocks, and the notion benefits from an increasing international recognition. The CFS Global Strategic Framework (GSF) recognizes as well the proven positive impacts that agro-ecology has. Yet, as underlined among others by UNCTAD in its Trade and Environment Review 2013 report (entitled *Wake up before it is too late. Make agriculture truly sustainable now for food security in a changing climate*⁴), reinvestments efforts in agriculture still prioritize the expansion of “somewhat-less-polluting” industrial agriculture, rather than supporting a real shift towards more sustainable agricultural systems. In that context, the Principles should contribute to make a difference by calling upon States and other relevant actors to prioritize the scaling-up of agroecological approaches in agricultural development. While the First Draft already includes one reference to agroecological approaches (see Principle 6), this remains much too weak and should be significantly strengthened, especially in terms specific actions expected from the different actors, e.g. through ad hoc agricultural research programmes, agricultural and trade policies, and support to farmers organizations and networks.

³ In terms of farming systems, “agroecology”/“agroecological approaches” can be defined as a holistic transition process aiming to make agriculture economically, ecologically and socially more sustainable by realizing to further degree ‘agroecological principles’ (theorized by the agroecological science as the key conditions on which agricultural sustainability depends), through multiple context-specific combinations of strategies and practices that are designed, applied and managed primarily by farmers through bottom-up dissemination and innovation processes, building on traditional knowledge and know-how while combining it with the best available agroecological science. Realizing agroecological principles consists primarily in mimicking natural processes, thus creating beneficial biological interactions and synergies among the components of the agroecosystem, instead of relying on external inputs.

⁴ Available <http://unctad.org/en/PublicationsLibrary/ditcted2012d3_en.pdf>

Specific changes should include among others:

- Strengthening the language of the Principle 6 (“Conserve natural resources and contribute to climate change adaptation and mitigation”), both to strengthen the reference to agroecological approaches and sustainable agriculture, and the need to avoid negative environmental externalities. Changes could include for example the following:
 - Adding “*and the depletion of natural resources*” at the end of current sub-point i;
 - Adding “as well as promoting the sustainable use and regeneration of natural resources through agroecological approaches” at the end of current sub-point ii;
 - Replacing, in current sub-point iii, “*such as through agroecological approaches, to foster sustainable intensification*” by “*through farmer-led bottom-up innovation and dissemination processes and agroecological transitions processes*”.
- Include relevant specific recommendations under States’ Roles and Responsibilities, to call upon States to take positive actions to contribute to sustainable agriculture, including and especially through the scaling-up of agroecological approaches. In particular, a new paragraph (between current paragraphs 36 and 37) could be added, with the following language: “*States should adopt specific measures for scaling-up agroecological approaches, including through: an increased support to farmers’ organizations’ and farmer-to-farmer networks’ activities for spreading agroecological farming; agricultural policies that provide public incentives to encourage good practices (such as the diversification of agricultural production), and disincentives to discourage practices that induce non-sustainable externalities; the prioritization of agroecological approaches in agricultural research, extension services and education; public procurement schemes that support agroecological production; sanitary, phytosanitary and quality standards better adapted to the specific constraints of small-scale producers and agroecological production.*”;
- Include relevant specific recommendations with regard to the Roles and Responsibilities of non-States actors, including the Private Sector and research organizations, universities, and extension organizations. Among others, in current paragraph 54, research organizations, universities, and extension organizations should be called to “*increase research activities on agroecological innovations, such as improving the productivity of local varieties through growing practices, land use and soil fertility management and building on farmers’ agroecological knowledge, know-how and innovations*”.

(7) Improving the conditions in which small-scale producers connect to markets

As underlined by the High Level Panel of Experts on Food Security and Nutrition (HLPE), small-scale producers are not “isolated” from markets: they are fully part of different markets but their position in these markets is weak⁵. Rather than putting primarily the emphasis on “improving their access to markets”, the Principles should include consistent recommendations for improving the conditions in which they connect to the various markets, at local, national, regional or international level. This implies notably specific measures for preventing excessive price volatility including through ad hoc food reserves (instead of putting first the emphasis on developing safety nets to better protect them against that volatility), for rebalancing power relations along the value chains through collective marketing systems and ad hoc supply management tools, or for better adapting sanitary, phytosanitary and quality standards to the specific constraints of small-scale producers.

Moreover, with regard to “access to markets”, it is of utmost important to avoid promoting the forced integration of small-scale producers into global and other value chains. In consistence with the recommendations adopted at CFS 40 on “investing in smallholder agriculture for food security and

⁵ HLPE. (2013). *Investing in smallholder agriculture for food security*, Rome.

nutrition”⁶, the Principles should instead affirm the right of small-scale producers to choose the value chains to which they want to participate, thus recognizing their right to autonomy. It should also be made clear that small-scale producers cannot be reduced to small-scale entrepreneurs, recognizing small-scale farming as a way of living and recognizing the multifunctionality and heterogeneity of agriculture.

Specific changes should include among others:

- Strengthening the language of Principle 1 in this regard, including by adding a new sub-point (between current sub-points iii and iv) with the following language: “*Improving the conditions in which small-scale producers access markets at all levels, while prioritizing local food systems and respecting farmers’ right to access the value chains of their choice*”;
- In current paragraph 36, States should be also called to « adopt adequate measures to prevent excessive food prices volatility, such as developing public stocks”;
- See our proposal above of an additional, specific paragraph on scaling-up agroecological approaches with regard to States’ Roles and Responsibilities (point 6 of this note). See in particular the last part of that proposal: “*sanitary, phytosanitary and quality standards better adapted to the specific constraints of small-scale producers and agroecological production*”;
- Adding language to call upon States to “*take action to rebalance unequal power relationships among different stakeholders*” in current paragraph 42;
- Adding specific language in paragraph 51 for small-scale family farming first and foremost as a way of living, as well as the multifunctionality and heterogeneity of agriculture.

(8) Regulating contract farming and PPPs

Ensuring the delivery of public goods and services (such as infrastructure, energy, etc.) is the responsibility of States. CSOs welcome therefore the consideration of public-private partnership (PPPs) as an option in case States do not have the adequate resources to provide all these necessary goods (instead than promoting per se the model of PPPs). However, while experience from the ground demonstrates how crucial regulating PPPs, as well as contract farming, is for preventing violations of the right to food, other human rights and environmental degradations, the First Draft does not include any recommendation in this regard. This represents a big gap. On the contrary, the Principles must formulate concrete safeguards to avoid such negative impacts and how those models of investments should be implemented. This is integrally linked to the roles, responsibilities and human rights obligations of States as regulator of investments.

Specific changes should include among others:

- In current paragraph 40, the following language could be added: “*Where public-private partnerships are developed, States should ensure that they: respond to the needs and promote and respect the rights of small scale food producers’; are based on models of investments that have the highest potential to respect, promote and fulfil the progressive realization of the right to food and respect and promote small scale food producers rights; recognize and mitigate risks for small scale producers, including with regard to climate change*”;
- In current paragraph 41, the sentence “States should ensure transparent and efficient market operations to prevent uncompetitive practices and abuse of power” could be replaced and completed by the following one: “*States should ensure transparent and efficient market measures to prevent*

⁶ See the report of the 40th Session of the CFS (October 2013), available <<http://www.fao.org/docrep/meeting/029/mi744e.pdf>>

unfair practices and abuse of power, including in the context of contract farming arrangements e.g. through collective marketing schemes and supply management.”;

- The language of current paragraph 42 should be adapted with the following changes in the last sentence (proposed changes in bold): “*States should foster fair and inclusive business models and **fair and inclusive** private public partnerships in order to promote sustainable and inclusive development, in line with the Principles, **while taking action to rebalance unequal power relationships among different stakeholders**”.*

(9) Tackling gender inequalities and empowering women

CSOs welcome the inclusion of a specific Principle (Principle 3 – “Foster gender equality and women’s empowerment”) devoted to gender equality and women’s empowerment. However, the First Draft still fails to address adequately the need to empower women and tackle gender injustices they are subjected to. Indeed, it does not include any concrete recommendation of actions in terms of the roles and responsibilities of the different actors to achieve that objective, such as calling upon States to guarantee equal employment rights to women (including equal pay) or to commit to a zero tolerance on sexual harassment. The final version of the Principles must fill this gap.

Specific changes should include among others:

- Strengthening accordingly current language of the Principle 3 (paragraph 26), including by adding at the beginning of current sub-point ii “*Taking fully into account differentiated impacts on women and men,*” adding at the end of the same sub-point “*and prioritizing women in benefits sharing*”, as well as by adding at the end of sub-point iv “*and empower women to claim their rights*”;
- See our proposal above (under point 1 of this note) to include a reference to the Convention on the Elimination of all forms of Discrimination against Women (CEDAW, particularly art. 14);
- In paragraph 38, include a specific sub-point, as a new one (between current sub-points ii and iii) with the following language: “*Assessing the capacity of existing policies, laws, and regulations to tackle gender inequality and empower women, including for claiming their rights*”;
- Including specific recommendations for calling-upon States to guarantee decent working conditions to women, including equal pay, and to prevent sexual harassment (see hereafter our proposal of an additional paragraph ; point 9 of this note).

(10) Improving policy coherence

The Principles call upon States to improve “*coherence and consistency among policies, laws and regulations in the range of areas related to agricultural and food systems*” (see paragraph 38).

Improving policy coherence is indeed very much needed. However, although the First Draft links among others such need to the ‘mainstreaming’ of the Principles, it lacks of clarity and consistence as to the key objectives of an improved policy coherence. Instead of promoting policy coherence in order “*to attract responsible private investment*”, it should promote it with the core objective of ensuring that all relevant policies having direct or indirect impacts on agricultural and food systems support and do not undermine food security, the right to food and other human rights, the livelihoods, incomes, development perspectives, and access to natural resources of small-scale producers, and contribute to eradicate poverty and to shift toward a more sustainable, resilient food system (including from a climate change perspective). This implies ad hoc governance mechanisms at national level. Policy coherence could notably be evaluated on the basis of the GSF.

Still in terms of policy coherence, the Principles should clearly prioritize food production as the primary purpose of agriculture (e.g. in the context of energy policies), while recognizing the multifunctionality and non-monetary exchanges of products and services values in agriculture.

Specific changes should include among others: language of current paragraph 38 should be adapted accordingly.

(11) *Guaranteeing decent working conditions to agricultural and food workers*

Wage workers form a large part of the total work force providing our food (approximately 40% in agriculture alone). Yet, the issue of working conditions in agricultural and food systems is barely addressed in the First Draft. Although the Principles underline in particular the need to respect ILO core labour standards and to foster decent work through improved working conditions (see the Principle 2 – “Contribute to sustainable and inclusive economic development”), the text remains too general in this regard, failing to mention key basic requirements in this matter, such as a fair minimum wage, minimum working age, fair working hours, safety measures, health insurance, holidays and other rights for workers in the agricultural and food sectors.

The Principles also fail to formulate concrete recommendations to the various actors in terms of specific actions required for ensuring decent working conditions, such as calling upon States to foster collective bargaining between employers and trade unions to fix decent working conditions both at national level and within individual enterprises, or calling upon retailers or processing companies to assume their responsibilities in terms of working conditions applied by their suppliers, including by adopting procurement practices (e.g. in terms of prices, procurement timelines...) that make possible decent working conditions along the whole value chain.

Specific changes should include among others:

- The language of Principle 2 (paragraph 25) should be adapted to mention explicitly relevant basic key requirements in terms of decent working conditions. This could be done for example by adding the following wording to the sub-point ii (added wording in bold): “*ii. Creating new employment opportunities, and fostering decent work by ensuring that a living wage is paid as a minimum as well as through fixing decent and improved working conditions at both enterprise and national level, ensure operational safety and health – including by respecting rules on minimum working age, fair working hours, safety measures, health insurance and holidays -, and/or training for career advancement*”;
- Including a new, additional paragraph (between current paragraphs 41 and 42), for calling-upon States to take positive actions for ensuring decent working conditions to agricultural and food chains along the value chains. Language of such additional paragraph could be as follows: “*States should adopt adequate measures for ensuring decent working conditions to agricultural and food workers along the value chains. Measures can include, for example; fostering collective bargaining between employers and trade unions to fix decent working conditions both at national level and within individual enterprises; regulating retailers and processing companies’ buying practices (e.g. in terms of prices, procurement timelines...) to ensure that these practices make possible decent working conditions along the value chains. States’ efforts should include measures to guarantee equal employment rights to women, including equal pay, and prevent sexual harassment*”.

(12) *Strengthening consultation and participation of the most vulnerable and marginalized*

One key requirement for ensuring that investments in agriculture and food truly contribute to food security and the realization of the right to food, and more broadly to sustainable development, is to democratize all relevant decision-making processes by strengthening the active participation of the most vulnerable and marginalized groups to decisions. Yet, the First Draft remains very weak in this regard. To fill this gap, CSOs recommend the following:

- The application of the principle of Free, Prior, and Informed Consent (FPIC) not only to indigenous peoples, but more broadly to all affected communities;
- The inclusion of specific recommendations of actions, by States and other relevant actors, for strengthening the active participation of the most vulnerable and marginalized groups to all relevant decisions-making processes.

Specific changes should include among others:

- The Principle 9 (paragraph 32) should be adapted to apply FPIC not only to indigenous peoples, but also to other affected communities. This could be done by adapting the language of sub-point iii as follows (changes in bold): “*iii. ~~Seeking~~ **Respecting** the rights of indigenous peoples to **F**ree, **P**rior, and **I**nformed Consent and apply this principle to ~~consent with regard to the rights of indigenous peoples~~ **all affected local communities;**”;*
- Language of current paragraph 38 should be adapted to include a specific emphasis on the need to increase the active participation of vulnerable and marginalized groups to relevant decision-making processes. This could be done by adding the following language to sub-point ii (additional text in bold): “*ii. Promoting the meaningful participation of representatives of all stakeholders in agricultural and food system investment policies and/or policy-making, **with specific efforts to increase the active participation of small-scale producers, agricultural and food workers, and other vulnerable and marginalized groups, especially women, at all levels;**”;*
- See our proposal for strengthening the language on multi-stakeholder platforms in current paragraph 39 (see hereafter in point 13 of this note);
- Calling-upon Private Sector Enterprises to adhere to the principle of FPIC for all affected communities. This could be done for example through a new paragraph aiming at calling-upon private enterprises to commit to and implement a “zero tolerance policy on land, water and other natural resources grabbing” (see our proposal in this regard under point 3 above of this note).

(13) Strengthening implementation, accountability and monitoring

The First Draft includes some elements dealing with the issues of the implementation, accountability and monitoring (see in particular the Principle 10 – “Review impacts and ensure accountability and transparency”-, paragraph 45 related to States roles and responsibilities in this regard, and paragraph 63 referring to the CFS as a possible forum to assess progress in the application of the Principles). Yet, language is weak and much too vague and should be significantly strengthened in the final version of the Principles. Key CSOs priorities in this regard are the following:

- All relevant national, regional or international policies, treaties or agreements having direct or indirect impacts on investments in agriculture and food (including bilateral or multilateral and regional investment treaties and trade agreements, and aid programs) should be put in coherence with the Principles. This should be made clear in the Principles, conditioning economic growth objectives to the realization of human rights and sustainable development;
- CSOs should be involved in the implementation, monitoring and evaluation of the Principles at all stages. This should be done through the establishment or strengthening of inclusive multi-stakeholders platforms⁷.
- The CFS should be recognized as the lead platform to share lessons learned and take stock on the implementation of the Principles. Every year, the CFS should assess relevant policies and

⁷ States should be encouraged to conduct separate consultations where needed with representatives of vulnerable and marginalized groups for better allowing them to express their concerns, free from any pressure of more powerful actors and with the required level of confidentiality.

practices of X countries, Y international/regional organizations and Z private sector companies (or sectors) in the light of the provisions of the rai Principles and make recommendations on how policies and practices can be improved;

- The Principles should recommend the establishment of country-led monitoring and accountability mechanisms, with the support of bilateral and multilateral agencies, to monitor the application of the Principles at national level. These mechanisms should apply the five principles set out in paragraphs 92 and 93 of the GSF, namely: (a) they should be human-rights based, with particular reference to the progressive realization of the right to adequate food; (b) they should make it possible for decision-makers to be accountable; (c) they should be participatory and include assessments that involve all stakeholders and beneficiaries, including the most vulnerable; (d) they should be simple, yet comprehensive, accurate, timely and understandable to all, with indicators disaggregated by sex, age, region, etc., that capture impact, process and expected outcomes; (e) they should not duplicate existing systems, but rather build upon and strengthen national statistical and analytical capacities⁸.

Specific changes should include among others:

- Adapting language of current paragraph 37 as follows (end of paragraph; proposed changes in bold): “for instance through investment treaties, **trade agreements** or contracts. ~~At the same time, States should not apply the Principles to promote protectionist interests or in a way which imposes their own policies on other nations~~”;
- Strengthening the language on multi-stakeholder platforms in current paragraph 39 as follows (suggested changes in bold): “39. States ~~are encouraged to~~ **should** establish **inclusive** multi-stakeholder platforms and frameworks at local, national and regional levels to formulate national strategies for applying the Principles. **Where necessary, States should also conduct separate meetings with representatives from the most marginalized and vulnerable groups, for better allowing them to express their concerns, free from any pressure of more powerful actors and with the required level of confidentiality**”;
- Under Roles and Responsibilities of intergovernmental organizations, current language of paragraph 46 should be strengthened, including and for example by adding the following wording at the end of the paragraph (proposed changes in bold): “*Inter-governmental organizations ~~can also serve~~ **should phase out the existing work on PRAI and support the CFS role** as a forum for sharing of experiences related to responsible agricultural investment and implementation of the CFS Principles outlined herein. **FAO and Ifad, together with other multilateral and bilateral agencies, should set up a mechanism to provide coordinated support to countries that require international cooperation to implement the rai principles, including the development of country led monitoring and evaluation mechanisms based on the guidance agreed in the Global Strategic Framework.**”;*
- Under the section on “Shared roles”, language of current paragraph 63 should be significantly strengthened, notably for recommending the annual assessment, by the CFS, of progresses achieved in X countries, Y international/regional organizations and Z private sector companies (or sectors), as proposed above.

⁸ See the GSF as adopted in October 2012. Available <<http://www.fao.org/docrep/meeting/026/ME498E.pdf>>