



CIDSE-CARITAS EUROPA-APRODEV COMMENTARY ON THE COMMISSION COMMUNICATION 'AN EU POLICY FRAMEWORK TO ASSIST DEVELOPING COUNTRIES IN ADDRESSING FOOD SECURITY CHALLENGES'

APRODEV, CIDSE and Caritas Europe welcome the Communication, 'An EU policy framework to assist developing countries in addressing food security challenges', issued by the Commission on 31st March 2010. We value the consultative process that preceded the Communication which provided opportunities for civil society to provide our views, concerns and proposals, and recommend such consultation processes be replicated within national policy development processes where these do not already exist.

We are encouraged to note that many of the concerns raised by civil society during the Commission consultation have been addressed in the Communication and we recommend that the Council embrace the important policy innovations it contains. A new EU policy framework should guide both Commission and Member State food security policies, and provide clear guidance to increase policy coherence for development with adjacent EU policy areas, especially trade, fisheries, agriculture and climate. On this note we wish to highlight the need to avoid inconsistencies within a new EU policy framework, to establish credible mechanisms for monitoring implementation of all instruments relevant to this framework, and to ensure coherence of other policy areas with the development agenda it sets out.

STRENGTHS OF THE COMMUNICATION

We welcome the emphasis on strengthening EU leadership within the global food security agenda, and contributing to a recalibration of international efforts to achieve MDG 1. We also welcome a vision more focused on **food security challenges** rather than only on agricultural production and growth.

We support the Commission's clear political choice to propose **the Right to Food as a cornerstone of a new EU policy framework**. We believe that empowering women and smallholder farmers, micro-entrepreneurs and marginalised groups to participate in the design, implementation and monitoring of national policies will have positive implications for the effectiveness of EU support.

We therefore also fully endorse the recommendation **to concentrate EU assistance on enhancing the incomes of smallholder farmers (especially women)** to enable sustainable small-scale food chains to increase empowerment, self-reliance, resilience, food availability, and environmental management. Evidence shows that investment in the smallholder sector in developing countries yields the best returns in term of poverty reduction and growth.

The Communication rightly recognizes **the multifunctional nature of agriculture**, as promoted by the landmark International Assessment of Agricultural Knowledge, Science and Technology for Development (IAASTD), and takes into account the need to **create enabling conditions for sustainable small-scale food production, processing and trade**, such as secure and adequate access to land, water, credit, and markets. In particular we welcome recognition of the need to prioritise intensification approaches that are sustainable and ecologically efficient.

We endorse the recommendation to **support more demand-driven research in the public domain, focusing on the needs of smallholder farmers**, and relying on a mix of traditional knowledge and modern technologies in strategies to support adaptation of smallholder farmers to climate change.

We welcome the resolve to **integrate the nutritional dimension in agriculture programmes**, by means of supporting diversification of smallholder agriculture and promoting the production of micronutrient-rich food.

We agree that **the EU should support national and regional integration on food security** within and amongst developing countries with the aim of preventing and mitigating food crises.

Finally, we endorse **EU support for the UN Committee on World Food Security (CFS)** as the central political body to enhance international food security governance.

AREAS FOR FURTHER STRENGTHENING

Smallholder farmers and value chains

The Communication places sustainable smallholder food production in a value chain context which is to be welcomed as an important strategy to raise incomes and improve food security. A pre-requisite for this is **securing access of smallholders to the means of production** (land, water, affordable agricultural inputs, labour, financial services and credit) as well as **processing and marketing opportunities, and access to local and cross-border markets**. This said, promoting the integration of smallholder food producers into local, national and even international value chains should never come at the expense of their own food security. The EU can and should play a role in creating the right conditions for a more equitable and sustainable smallholder integration into agricultural value chains and markets. This would involve **support to the strengthening of smallholder capacity to organise and to enhance their bargaining power vis-à-vis other value chains actors**, who presently hold disproportionate bargaining power over smallholder producers. Making available financial and technical support to smallholder producer organisations should therefore be included as part of the EU strategy, additional to ensuring their participation in policy formulation and implementation processes.

Access to natural resources

There is a particular need for securing and enforcing access to natural resources such as land and water for small-holder farmers, rural micro-entrepreneurs and pastoralist communities. For pastoralists, regional policy harmonisation allowing (cross-border) livestock mobility is important.

Land tenure by smallholder farmers is being threatened by large-scale land acquisitions driven amongst others by foreign agricultural investments, without prior and informed consent by the local communities, and without adequate benefit sharing. The EC communication fails to include agrarian reform as a key policy to address the unequal and insecure access of smallholders to land, which remains a root cause of poverty. In the context of absence or stagnation of redistributive land policies at the national level, **our networks consider national and international regulation on land acquisition to be urgently required.**

Support to developing country governments, for example in protection of civilians against human rights abuses, access to justice for victims of human rights violations by companies, or in the implementation of African Land Policy Guidelines, should be complemented by the monitoring of investment behaviour of European private actors, who should be held accountable to respect human rights. Companies should have a reporting obligation as regards their adherence to corporate social responsibility (CSR) and adherence to CSR criteria should be mandatory for companies applying for subsidies at EU and national European government levels.

Gender

The Communication recognises the important role played by women in overcoming food security challenges in developing countries, but stops short of a real analysis of this role and the measures needed to harness the potential of women as agents. Knowledge of traditional technologies and biological diversity is largely held by women in developing countries; this knowledge must be recognised and protected if development and sustainability goals are to be met. This will include protecting women's intellectual property rights relating to the knowledge of indigenous plant varieties and cultivation, and addressing barriers which restrict women's access to training, education and agricultural technologies. This is crucial, inter-alia, in order to improve their ability to cope with climate change induced stresses.

Food security and humanitarian assistance

The European Commission Communications on food security and on humanitarian food assistance are complementary and should be considered together as some points are more integrated in one or the other Communication. For instance, whereas the Communication on food security does not mention that food insecurity is one of the push factors of **forced migration and internal displacement**, this point figures in the second communication on food assistance.

COHERENCE AND CONSISTENCY

Policy Coherence for Development must be more than consistency in pursuit of EU domestic interests

The lack of analysis of structural and root causes of hunger and food insecurity in the Communication, and, related to that, the lack of assessment of the differentiated benefits and harms of international trade and EU Common Agricultural Policies on food security is a missed opportunity. If such an analysis had been included, the impact of broader EU policies would have been identified.

While price volatility is discussed, the fact that CAP and EU import restrictions are creating stability for EU farmers, but transferring instability to the outside world, is not acknowledged. The only trade measures that are highlighted are export restrictions on basic food. We point out in this respect that the responsibility of a country with acute food insecurity to not contribute to global price volatility must be balanced against its sovereign right and responsibility to prioritise food supply to its own population. We strongly support that future reforms of the CAP and EU Fisheries Policy take global food security objectives into account.

On trade, the Communication is ambivalent and weak in assessing the impact of international trade on food systems and food markets. While we appreciate the acknowledgement of policy space and encouragement of use of existing policy flexibility, **there is a need to increase the policy space for developing countries exposed to economic, financial and food crisis**, and this should be acknowledged and supported. We agree that trade can make a contribution to increase availability of food. However, increased standardisation and harmonisation of rules to date has tended to serve exporters to EU markets. Sustainable agricultural food chains should empower smallholders to sell, serve and trade on local and regional markets without being pushed out by highly subsidized imports.

While we welcome the encouragement to increase EU support to the integration of regional food security and agricultural policies, the Communication fails to recognise the fact that European Partnership Agreements (EPAs) have undermined the emergence of regional food markets. **Credible and effective support to regional integration will require reconsideration of the EPAs approach**, with priority given to pacing and sequencing of regional markets before pushing for market opening with the EU.

In order to reach the maximum impact on poverty and hunger, the EU food security policy framework needs to address the linkages between all European policies that affect directly and indirectly the situation of poverty and hunger in developing countries, namely the Common Agriculture Policy, trade, development, migration, climate change, disaster preparedness etc. The worthy ambitions of a new policy framework will be severely undermined if the implications are only for development cooperation.

A new EU food security policy framework should furthermore be consistent with the development objectives it sets. Whilst the Communication advocates that EU assistance prioritise intensification approaches that are sustainable and ecologically efficient, respecting the diverse functions of agriculture and drawing on traditional knowledge, it is not clear what kinds of *new technologies* are to be supported within this. The EU should prioritise options that have proven to work; the IAASTD stressed that **food security in countries around the world will be best served by seeking a diversity of pathways depending, in part, on history and context**. The IAASTD deserves greater recognition and could provide expert input to ensure consistency and coherence by analysis of agricultural sectors in developing countries in greater detail to identify best approaches to implement new multifunctionality paradigms.

We recommend that the EU use the Advancing of African Agriculture framework in its food security funding guidelines, which is coherent with the new approaches proposed in this Communication.

GAPS

Additional resources to achieve objectives

Our networks believe that effective European action for food security requires putting aside adequate financial resources to support agricultural and rural development, especially in Africa. Whereas the EU €1 billion Food Facility has been an important funding instrument, especially for short- and medium term responses to the food price crisis, the overall financial support for this important sector is falling short of what is urgently needed. In addition to the Dutch (€2 billion) and European Commission (€3 billion) support to the l'Aquila initiative over 2010-2012, the majority of EU Member States have yet to step up agricultural and rural development funding. Whilst the African nations have committed themselves, in 2003 in Maputo, to set aside 10% of their annual budgets for this purpose, we call on the EU and all member states to make at least an equivalent commitment to agriculture and rural development in their Official Development Assistance (ODA), whose share within overall ODA spending has fallen from 17% in 1980 to around 5% today.

Monitoring and Evaluation

The Communication lacks clear proposals on how the framework should be implemented by the Commission and Member States, and on possibilities for holding the EU to account. To be effective, the **implementation of a new policy framework must be regularly monitored and reviewed**, and should include impacts of other policy areas on the implementation of the objectives.