



Confédération européenne des ONG  
d'urgence et de développement

## **Consultation on the Issues Paper "Towards an EU policy framework to assist developing countries addressing agriculture and food security challenges"**

### **- Contribution from the European Food Security Group (EFSG) of CONCORD -**

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The CONCORD EFSG is composed by up to 40 European civil society organisations (see the list page 9). This joint contribution complements the respective contributions that would have been addressed to DG Development by these organisations.

#### **General comments on the Issues Paper**

The EFSG welcomes the opportunity to contribute to this Issues Paper, which aims to elaborate an EU Policy Framework to assist developing countries addressing agriculture and food security challenges. Whilst there are concerns that this consultation process is taking place without sufficient time for detailed preparation and to allow enough time for consultation, notably with its Southern partners, the EFSG would like to raise the following remarks to the attention of the European Commission:

- 1) **The Issues Paper (IP) does not elaborate a clear vision of the EU on the issue of agriculture, development and food security.** It would be preferable to include a stronger positioning on a number of issues (how the EU sees agriculture in the future, how the different areas – agriculture, trade, climate, etc. – interact, what is the EU's responsibility vis-à-vis Southern partners, and what are the different roles of stakeholders?). The EU Policy Framework that will be elaborated from the Issues Paper should provide this vision and should give a better sense of the urgency of the issues at stake.

In particular, the EFSG calls upon the EU to make some well argued choices on several potentially controversial issues, e.g. support for small or large scale agriculture, support to trade liberalisation or trade regulation in order to promote food security, the responsibility of the current international policies in determining chronic food security, the EU stance on promoting agrofuels production or the role of European companies in the acquisition of farmlands in food-deficit countries, etc.

While developing this vision, the principles of the Paris Declaration and the Accra Agenda for Action on aid effectiveness should be referred to as guiding principles, as well as the principles of food sovereignty, the role of Southern farmers' organisations and the high make up of women farmers.

- 2) **A pro-poor focus that emphasises the need to target those most at risk, and a reference to taking a rights-based approach should be at the core of the proposed EU Policy Framework.** In general, the IP appears to be more state-level focused rather than people-centred. The IP should map and acknowledge the geographic location of the world's hungry in order to target its efforts (e.g. in some cases there may not be a need to increase production on a national/global scale, but rather to improve local production and locally adapted, decentralised solutions).

- 3) **Reference to several relevant processes are absent in the IP.** The findings in the IAASTD reports provides with recommendations on most of the questions raised in the IP. Considering that the EC has been a major supporter of the IAASTD exercise and that several EU governments approved it, this is the opportunity to thoroughly explore its findings and convert them into a programming/policy/research agenda for European food and farming policy and development assistance.

Advancing African Agriculture should be cited as an existing EU policy on which to build upon. A monitoring report by European Civil Society Organisations provides useful recommendations on this matter<sup>1</sup>.

The developments in recent years with regard to the understanding of food aid / food assistance –developments on the reform of the Food Aid Convention, new Humanitarian Assistance Policy – should also be taken into consideration in the context of this process in order to maximise synergies between humanitarian food assistance and longer term food security objectives.

- 4) **The issue of the lack of coherence of wider EU policies, particularly between EU development and trade policies must be addressed.** The IP remains vague on the means for achieving better coherence; the risk is that the damage done by EU trade policies to achieving food security will continue. PCD should be considered as one of the main thrusts in the EU Policy Framework. The EU should be able to adopt a food security policy framework which critically reviews the impact of its decisions in many different areas which affects the reality of world food insecurity.
- 5) **The Issues Paper's reference to the 'Whole of the Union' approach is a serious threat to the EU development policy.** CONCORD already expressed concerns on this approach when it was first referenced in May 2009<sup>2</sup>. By focusing on non-ODA sources, the 'Whole of the Union' represents a potentially major shift in EU development cooperation away from ODA towards one that would include a wider range of flows with questionable development impacts and delivered with non-development objectives in mind.

The reference to a "*Whole of the Union*" policy on agriculture and food security compared to the current European Community/EU Member States policy frameworks and compared to existing global/regional policy frameworks" is not clear and does not explain how this relates to the recent EC moves in 2009 to impose this approach in the context of the revised PCD agenda and ODA. CONCORD has argued that such an approach would not offer more coherent EU policies in favour of development but would rather threaten to weaken the PCD agenda.

- 6) **The issue of how to monitor, measure and evaluate the impact of the proposed EU Policy Framework should be dealt with. The question of its implementation also needs due attention.**
- 7) **The European Parliament and its' relevant bodies (DEVE and AGRI Committees) should be informed, consulted and have enough time to react to this process.**

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<sup>1</sup> [Monitoring report](#) by European Civil Society Organizations of the Commission's proposal for Advancing African Agriculture, November 2008.

<sup>2</sup> CONCORD [Briefing note](#) – PCD, whole of the Union approach and ODA+ (October 2009)

**Answers to the questions in the Issues Paper**

**1. Do you see other drivers that could justify the development of a EU policy on agriculture and food security and which could need to be addressed in the policy?**

One additional general argument to support the need for elaborating an EU Policy Framework to assist developing countries addressing agriculture and food security challenges is the fact that the EU has not thus far taken a clear position on the model of agriculture to be promoted (e.g. smallholder agroecological family-based farming, as argued for in the IAASTD report).

In this regard, the role of small-holder farmers must be emphasized, as hunger is most dominant in rural areas and among small farmers. Any efforts to assist developing countries to increase their agricultural production (on a national scale) will not solve the hunger crisis if those who are suffering from hunger do not share the benefits.

The increasing trends of environmentally-induced migration should also be referred to as a driver<sup>3</sup>. The EFSG emphasizes that the term "technologies" (see page 5 in the Issues Paper) should not be taken to comprise Genetically modified organisms.

**2. In your view, which are the main strengths and weaknesses of the current European Community/EU Member States action in the areas of agriculture and food security?**

The EFSG has in the past raised concerns about declining ODA for agriculture and rural development over the past decades. This trend is exacerbated by some EU Member States counting climate change adaptation and mitigation funds as ODA.

The lack of coherence between the duration of EU projects and project objectives and regulations has been highlighted in the context of the launch by the EU of the €1 billion Food Facility in 2008<sup>4</sup>. While the Facility was designed to enable the EU to react rapidly to the food crisis, its' main aims are to encourage producers to increase supply; to deal directly with the effects of volatile food prices on the local population; and to increase food production capacity and improve the way agriculture is managed in the long term. However, the funds are only available over a period of three years (2009-2011) and all of the funds have to be disbursed and spent by the end of 2011. It is therefore difficult to assess the long-term impact of the Facility, so the funds are more of an emergency response than a medium to long-term development aid as originally proposed by the EC.

**3. What advantages/disadvantages do you see in a "whole of the Union" policy on agriculture and food security compared to the current European Community/EU Member States policy frameworks and compared to existing global/regional policy frameworks?**

As stated in the general comments section in this document, in CONCORD's view the reference to the 'Whole of the Union' approach is a threat to ODA criteria and EU development policy. CONCORD already expressed concerns on this approach when it was first referenced in May 2009. By focusing on non-ODA sources, the 'Whole of the Union' represents a potentially major shift in EU development cooperation away from ODA towards one that would include a wider range of flows with questionable development impacts and delivered with non-development objectives in mind.

The reference to a "*Whole of the Union*" policy on agriculture and food security compared to the current European Community/EU Member States policy frameworks and compared to existing global/regional policy frameworks" does not explain how this relates to the recent EC moves in 2009 to impose this approach in the context of the revised PCD agenda and ODA. CONCORD has argued that such an approach would not offer more coherent EU policies in favour of development but would rather threaten to weaken the PCD agenda.

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<sup>3</sup> [Position paper of CONCORD](#) – "Climate change and development" (July 2009)

<sup>4</sup> European NGOs welcome the 1 billion € fund for farmers but ask for long term measures – [press release](#) (September 2008)

4. Which European policy/set of policies could the EU build upon in order to support regional integration responses to food production challenges in developing countries?

**5. Do you think that rights-based approaches to food security could be an added value in the redefinition of the EU approach to agriculture and food security? If so, please explain why and how these approaches could be operationalized.**

CONCORD welcomes the accent on a rights-based approach and to food sovereignty and the need to reflect on the added value of these concepts in the redefinition of the EU approach to assisting developing countries addressing agriculture and food security challenges. It will be important that the forthcoming Communication clear states by what interactive process this reflection will be carried out, in dialogue with the civil society stakeholders who have promoted these concepts.

The proposed EU Policy Framework should be in itself an instrument to fulfil the EU Member State's commitment to the right to food (see CESCR General comment 12, Fig.36: "...*State parties should recognize the essential role of international cooperation and comply with their commitment to take joint and separate action to achieve the full realization of the right to adequate food. In implementing this commitment, State parties should take steps to respect the enjoyment of the right to food in other countries, to protect the right, to facilitate access to food and to provide the necessary aid when required...*"). This has to be acknowledged in the Issues Paper.

A right to food approach is also a tool for empowerment, strengthen people to, on the one hand influence their governments to take concrete steps to improve food security and, on the other hand to empower people to take actions to improve their own life. It is the responsibility of the governments to create enabling environment.

Lastly, the proposed EU Policy Framework should be a reference to the Voluntary Guidelines to promote the Right to Food (FAO, 2004).

**6. Based on your experience which actions could be promoted in short, medium and long term to foster food supply, and which actions could be promoted at global, regional and national levels? In particular at regional level what do you think the role of agricultural policies/strategies should be and how best could the European Commission and EU Member States support them?**

The Issues Paper (see section 4. in the Issues Paper) should refer to increasing availability of food by promoting sustainable local smallholder food production. In general, the IP should clearly state that "national ownership" includes stakeholders as well as governments.

**7. What role do you see, if any, for the EU development policy to contribute to increased food production in developing countries and the availability of food (directly and/or indirectly)? And how could animal and plant health best be integrated in all pillars of food security policies and strategies?**

An EU Policy Framework should emphasize local, national and regional markets, not international markets (see section 4.1. in the Issues Paper). It should recognize that building regional markets requires supply management and protection against unfair competition.

When looking at agricultural production in developing countries, the list of challenges should include the need to overcome the current lack of appropriate support for smallholder food producers.

8. Which, in your views, are the main policy constraints and opportunities in developing domestic/regional trade markets in developing countries, in particular for south-south integration? Do you consider that the EU should play a role in such development and if so, which one?

9. How to address pastoralism in this context?

10. How could the dimensions of access to food be better integrated in European Commission / EU Member States assistance programmes?

11. Which could be the priority areas for action at national/regional and international level to improve physical access to food?

12. How can donors, and in particular the European Commission /EU Member States, address most effectively the social dimension of access to food?

13. How could the EU contribute to improving the governance of food markets in developing countries?

**14. In your view, what policies and approaches could be developed by donors in particular the European Commission /EU Member States to improve the prevention and management of malnutrition?**

Valid policies and approaches are mentioned in the recent publication by Save the Children, *Hungry for Change*<sup>5</sup>.

**15. How could nutritional components best be integrated in other pillars of food security policies and strategies?**

See the Executive Summary of the World Bank publication *From Agriculture to Nutrition*<sup>6</sup>, "*The key lessons learned from this body of evidence are that agricultural interventions are most likely to affect nutrition outcomes when they involve diverse and complementary processes and strategies that redirect the focus beyond agriculture for food production and toward broader consideration of livelihoods, women's empowerment, and optimal intrahousehold uses of resources. Successful projects are those that invest broadly in improving human capital, sustain and increase the livelihood assets of the poor, and focus on gender equality.*"

16. How could the EU better target chronic malnutrition? How could the European Commission better address the vicious cycle linking malnutrition to ill health and impaired individual growth and loss in productivity?

17. How could a smoother shift from nutrition in emergency situations to post-crisis and development situations be ensured?

18. How could a multisectoral response to nutrition be operationalized at national and international level? Which could be in your view the main challenges to such operationalization?

**19. How could the impacts of crises be mitigated at national and household levels?**

The EC should coordinate with the other institutional stakeholders to develop national strategies which harmonize policy frameworks for adaptation, disaster risk reduction, humanitarian assistance and development. These strategies should include ways to reduce risks and address the underlying causes of vulnerability in order to strengthen resilience and to prevent food crises in the future.

The EC should ensure that development planning and food security assessments incorporate climate risk information, and that analyses of vulnerabilities and capacities are collated for all sectors and made available and widely accessible at regional, national, sub-national and local levels. These analyses should be used to build long term resilience, taking into account seasonal cycles of hunger.

Thirdly, the EC should strengthen local adaptive capacity with financial and technical support to develop long-term sustainable adaptation solutions by building on existing local approaches/community based strategies.

20. Do you think that specific instruments could be developed to prevent the volatility of food prices? If so, which could be in your view the most effective for that purpose?

**21. What policies and instruments could be put in place, by who (donors, beneficiaries?) and at which level (international, regional, national?) to prevent and mitigate food crisis?**

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<sup>5</sup> Report [Hungry for Change](#), Save the children, 2009.

<sup>6</sup> Report [From Agriculture to Nutrition](#), pathways, synergies and outcomes, World Bank, 2007.

The food price crisis that erupted at the beginning of 2008 has required policy change, especially in the field of agriculture, based on the human right to food as well as short term and long term efforts in terms of aid governance.

This crisis was not the result of a sudden emergency, but rather the outcome of cumulative effects of long term trends and more recent factors, and while it is difficult to assess which factors contribute the most to the crisis, it is clear that the crisis is the result of failures of past policies related to the international food governance that have weakened people's ability to exercise their right to food.

The EFSG policy paper (developed in October 2008)<sup>7</sup> provides a critical outlook on the international responses that were underway at that time and sets out the main short, medium and long term policy responses necessary to tackle the crisis.

In particular, the final part of the document details the policy responses that were immediately needed at the time the crisis erupted. The EFSG has listed recommendations covering three main areas:

- Measures relating to trade and agriculture policies that address some of the structural causes of the crisis;
- Increase capacity of smallholder agriculture;
- Expand social protection and safety nets to support people that are worst hit from the food crisis.

Other actions to take to prevent global, national and localised food crises in the future:

- Risk reduction and climate change adaptation measures should be integrated into the EC's Country Strategy Papers and national poverty reduction plans, sectoral plans (agriculture, water, environment, health) and strategies (food security) as high political priorities with sufficient budgets and indicators. CSPs should be based on ways to reduce risks of future food crises and tackle the political and social drivers behind people's vulnerability.
- The EU should move forward on the implementation plan of its DRR strategy, developing guidelines and tools for EC staff, including measures to prevent slow onset food crises.
- The EC should ensure better coordination between the agendas, actors and existing policies on food security, food assistance, DRR, climate change adaptation, social protection, natural resource management, water resource management and poverty reduction across the EU institutions, other donors, the UN, Government Ministries, civil society, and the private sector e.g. by building the capacity of inter-ministerial committees, national platforms on Disaster Risk Reduction or Food Security Task Forces, which can bring together a range of development and humanitarian actors to prepare for food crises.

**22. Do you think regionally or globally managed food stocks – physical or virtual – would be a useful alternative for national level stocks? How could such supra-national food stocks be managed?**

Cf.: above-referenced policy paper (EFSG recommendations in the policy paper include the establishment of appropriate buffer stocks to prevent too much price volatility, integration of local and regional agricultural supply and food demand and improving the fluidity of intra-regional markets). However food buffers should be managed and controlled as locally as possible (subsidiarity principle, cf. answer to question 26).

23. Do you think that other areas of intervention could/should be included?

**24. Based on your experience how would you see a reformed international governance system? Which reform options that are currently under discussion do you think could be the most appropriate and viable and why? Which alternative options would you propose?**

The EU should state clearly that it will support the effective implementation of the reform of the FAO Committee on Food Security (CFS). The Issues Paper should recognize that the CFS reform foresees strengthened links between food security action plans and policy forums at national, regional and

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<sup>7</sup> [The Food Price Crisis: What needs to be done?](#) (October 2008)

global level and quality participation by civil society, particularly organizations representing small food producers and poor urban consumers (cf. Section 5 in the Issues Paper).

The CONCORD EFSG emphasizes that the Comprehensive Framework of Action (see section 2.1. on ongoing initiatives in the Issues Paper) is a technical document and not a political document adopted by UN member governments. The Global Partnership on Agriculture, Food Security and Nutrition (GPAFS) should be acknowledged as a platform for all relevant stakeholders.

In fact, the nature and the governance of the GPAFS is not clear at this juncture, and the CONCORD EFSG stresses that the EU should commit itself to the reformed CFS as a democratic, inclusive global policy forum.

**25. Do you agree that a “whole of the EU” approach could enhance the effectiveness of the EU actions to address current developing countries' challenges in agriculture production and food security?**

The reference to the ‘Whole of the Union’ approach is regarded as serious threat to the ODA criteria and EU development policy. CONCORD reacted to this approach<sup>8</sup> when it was first referenced in May 2009, and reaffirms that this approach, by focusing on non-ODA sources, represents a potentially major shift in EU development cooperation away from ODA towards one that would include a wider range of flows with questionable development impacts and delivered with non-development objectives in mind.

**26. Which could be in your view the main features of a national or regional agriculture and food security strategy? In application of the principle of subsidiarity which could be the respective areas of competence of national policies/strategies vs. regional ones?**

Food security and agriculture must be prioritized in national poverty reduction strategies and budgets to strengthen resilience, with commitments to intensify efforts to reach MDG 1 by 2015 e.g. African governments committed to allocate at least 10% of national budgetary resources for agricultural and rural development by 2008, under the Maputo Declaration of 2003 and the Comprehensive Africa Agriculture Development Programme (CAADP), but only 8 countries have achieved this.

Comprehensive and country led national food security strategies (guided by the Comprehensive Framework for Action), across Ministries should ensure the 4 pillars (as part of wider poverty reduction and climate change adaptation strategies). The focus should be on women small-scale farmers, landless laborers and pastoralists in rural areas.

Inter-ministerial task forces and national food security councils or platforms in the partner countries should be strengthened to improve coordination across sectors.

National strategies should tackle the structural causes of people’s vulnerability and improve access to resources, markets and governance. They should build just and equitable social, economic and political structures, processes and practices as people’s vulnerability at the local level can often be linked back to political and social drivers such as poor governance, lack of entitlements, poor access to services, inequality, gender issues, greed and prejudice.<sup>9</sup>

**27. What would you consider to be the key policy issues to be addressed for the successful transition between emergency interventions and long term food security objectives?**

The EU’s policy on food security and ECHO’s humanitarian food assistance policy should be consistent with the EU’s Communication on DRR and the EU Humanitarian Aid Consensus e.g. they should include DRR, building of livelihoods and resilience to future shocks, and tackling the causes of vulnerability, especially in chronically food insecure contexts (not just emergency response).

The EC should identify and outwork long term mechanisms and funding instruments for linking and ensuring a successful transition between DG ECHO relief and emergency projects, DIP-ECHO DRR

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<sup>8</sup> CONCORD [Briefing note](#) – PCD, whole of the Union approach and ODA+ (October 2009)

<sup>9</sup> report *Beyond Any Drought*, June 2007, Sahel Working Group

pilot projects, the Food Security Thematic Programme, and DG DEV and RELEX development projects in which DRR has been mainstreamed.

28. Which common principles could be set out to coordinate emergency and development actions? How could positive synergies be established between short-medium and long term responses?

29. What are the main challenges to promoting food security in fragile states, and how could the EU best position itself to work in such contexts?

30. How could synergies and complementarities and division of labour between the European Commission, the EU Member States and the UN agencies be improved? How could synergies with private foundations be improved?

**31. How could synergies amongst different EC/EU policies with an impact of food security (notably trade, energy, agriculture, humanitarian, nutrition etc) be increased?**

Commitments taken on policy coherence for development must be reflected in EU policies by improving coordination between EC Directorates-General and services, and the UN agencies, to ensure that food security is integrated rather than a fragmented approach with regard to adaptation to climate change, agricultural policies, access to sustainable energy, water resource management, trade and migration, humanitarian work, development and trade.

CONCORD's report on Policy Coherence for Development (October 2009) contains a chapter on agriculture which analyses the most damaging EU policies on sustainable agriculture and food security in developing countries (see the chapter on agriculture<sup>10</sup>).

CONCORD's main recommendation is that, for the EU to support a world food system that better serves the poor and hungry, supports the development of viable local economies and is in line with the climate change challenge, the EC must improve its internal coherence by stepping up the coordination of its internal organisation, staff, policies and programmes on food security, agriculture, climate change, DRR, social welfare, nutrition, environment, the management of natural resources, emergencies, development, trade and energy, e.g. through joint programming and synergy between funding instruments and analyses, inter-service task forces, developing guidelines and tools, while the mid-term review of CSPs should be used as an opportunity to improve the coherence of policies at field level.

The concerns of CONCORD with regard to EU trade and energy policies are also expressed in a policy non-paper<sup>11</sup>.

32. How could synergies between existing financial instruments be maximized and how should budget support be best used to support food security objectives?

33. What lessons can you share from your work within the area of food security that could be useful for the implementation of the proposed EU policy?

34. How could in country coordination be improved in line with the principles of the L'Aquila Declaration?

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<sup>10</sup> [CONCORD report](#) – Spotlight on Policy Coherence for development (October 2009)

<sup>11</sup> [Background paper](#) for the Concord Food Aid, Trade and Agriculture Forum "Trade, Agricultural and Rural Development agenda: overview, challenge and prospects for Concord (March 2008)



**The CONCORD EFSG is composed by the following organisations:**

Associazione di Cooperazione Rurale in Africa e America Latina (Italy)	Hungarian Interchurch Aid (Hungary) / APRODEV
Action against Hunger (UK)	ICCO (the Netherlands)
ActionAid International	Oxfam Sol (Belgium)
CARE International	Oxfam UK
Caritas Europa	Plan International
Cercle (Luxembourg)	Plataforma Portuguesa das ONGD (Portugal)
CIDSE	Practical Action (UK)
Collectif Sécurité Alimentaire (Belgium)	Reggio Terzomondo
Concern Worldwide	Save the Children UK
Crocevia (Italy)	SLOGA (Slovenia)
EEPA	Slovakia-Southern Africa Society / MRVO (Slovakia)
EU-Cord (Christian Organisation in Relief and Development)	SOS Sahel
FIDA International	Tearfund
FoodFirst Information and Action Network (FIAN)	Terra Nuova (Italy)
Global Verantwortung (Austria)	UK Food Group (UK)
Glopolis (Czech Republic)	Vredeseilanden (Belgium)
GRET / Coordination Sud (France)	Welt Hunger Hilfe (Germany)
HelpAge	Welthaus (Austria)
	WEMOS (the Netherlands)
	World Vision