



**bio**watch  
SOUTH AFRICA biodiversity | food sovereignty | agroecology | social justice

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**Attention:**

Mr Makala Jeffrey Ngaka

By email: [JeffreyN@daff.gov.za](mailto:JeffreyN@daff.gov.za)

cc: [Secretariat.CPDS@daff.gov.za](mailto:Secretariat.CPDS@daff.gov.za)

Department of Department of Agriculture, Forestry and Fisheries

**Biowatch South Africa Comments  
on the National Policy on Comprehensive Producer Development Support: Draft 5 ver. 3**

Thank you for the opportunity to comment on the National Policy on Comprehensive Producer Development Support: Draft 5 ver. 3, dated 30 May 2018.

Our submission follows below and consists of:

1. Introduction to Biowatch South Africa
2. Comments on the National Policy on Comprehensive Producer Development Support

Yours sincerely

A handwritten signature in black ink that reads 'Rose Williams'.

Rose Williams  
Director

Trust No. IT 4212/99

## **1. Biowatch South Africa**

Biowatch is a non-governmental organisation established in 1999, which strives for social and environmental justice within the context of food sovereignty. Biowatch works to challenge unsustainable agricultural practices and to advocate for agroecology as an ecologically viable alternative that safeguards people and land. This includes supporting smallholder farmers; working with civil society to create joint understanding and action; and constructively engaging with government in implementing policies and practices that promote, facilitate and actively support agroecology and farmers' rights. We have a long track record of working on policy issues concerning agriculture, biodiversity and indigenous knowledge systems. We have worked directly with smallholder farmers for 15 years providing training and support for diverse, agroecological production.

## **2. Comments on the National Policy on Comprehensive Producer Development Support: Draft 5 ver. 3**

### **General comments**

Biowatch SA welcomes government initiatives to provide support to smallholder production, with differentiated categories of support, with the majority of funds allocated to those most in need. We are also encouraged by the commitment to address the impact of climate change by transitioning producers to environmentally-friendly production processes with a lower carbon footprint. However, we have some serious concerns with some of the measures in the draft policy as these undermine this commitment.

We are very concerned with the value-chain approach linked to priority commodities (soybeans, maize, wheat, cotton and sorghum) that dominates throughout this policy. Although this approach may partially alleviate food insecurity by providing rural communities with more income to buy food, it does not fundamentally address problems in the current food system that lead to poor nutrition and exacerbate climate change. We note the current food systems' devastating contribution to climate change.<sup>1</sup>

What the country needs is production of diverse, nutritious, fresh, culturally appropriate and toxin free foods that are distributed directly to local communities through local markets. This will also avoid a large proportion of the current food systems' climate impact by avoiding long distance transport, accompanying refrigeration, packaging and unnecessary processing with unhealthy food additives and preservatives.

From our own experience in working with farmers, smallholders should be supported in diversifying production using agroecological farming methods. This allows for greater productivity in an 'polyculture' of diverse grains, legumes, vegetables, fruits and livestock to providing a diverse and nutritious diet throughout the year. Soil fertility is maintained by using on farm biomass and pest incidence is reduced through soil health and mixed cropping. Farmers maintain their own seed stock of locally adapted, climate hardy and nutritious crops – these traditional crops also contribute to maintaining local food and ritual culture. Such diverse agroecological systems enable smallholders to

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<sup>1</sup> GRAIN calculates that when all impacts are considered from farm to plate to landfill, the industrial food system is the greatest cause of anthropogenic climate change, accounting for around half of all emissions. This includes: land use change and deforestation (15-18%); on farm emissions (11-15%); processing, transport, packing and retail emissions (15-20%); and waste emissions (2-4%).

avoid the cost of inputs; providing not only food, but also medicines and other products. Importantly, this agroecological approach with healthy soil covered in mulch or crops sequesters carbon in the soil and stores water. Carbon emissions are also prevented by minimising soil disturbance and avoiding synthetic fertiliser.

An agroecological approach to production for local markets also provides opportunities for the development of small and micro-enterprises in supplying agroecological inputs such as compost, farmer varieties of seeds, seedlings, natural pest control formulations; small-scale food processing and milling; and producing and maintaining appropriate technologies.

We are also concerned with the policy's reference to 'conservation agriculture' and 'climate smart' agriculture as the means to more environmentally friendly and climate resilient production. While these include some ecological production methods they also promote GMOs, herbicides and synthetic fertilisers as part of the production package. While particular practices of conservation and climate smart agriculture may be useful in transitioning commercial farmers to more environmentally friendly production, household and smallholder producers shouldn't be forced into using these corporate supplied and patented inputs as part of government support packages. Instead they should be supported through skills-rich government extension to transition away from industrial inputs in favour of agroecological systems which ensure healthy soils and communities, and debt-free production.

We also note the necessity to create many, many jobs in South Africa. Large-scale, commercial agriculture has seen a long period of job-shedding, as these enterprises capitalised, mechanised and consolidated to compete in global markets. **This historical record should inform government policy.** We shouldn't be pushing smallholders into this arena. International evidence shows that small-holder production is on average at least 1.5 times greater than that of large-scale producers. Small farms also contribute more to the local economy in terms of permanent jobs and per capita income, and provide greater independence for producers.

Our detailed comments are informed by these concerns.

## **Detailed comments on the policy document**

### **7. Categories of producers**

Biowatch supports the approach that the most vulnerable households should receive the most state support to become self-sufficient and food secure producers.

The policy needs more clarity on:

Own contribution – will this include the smallholders own labour, and other in-kind contributions or does this mean a monetary contribution? We support that the smallholder's contribution of their own labour and other in-kind contributions are acknowledged, although this may be difficult to quantify.

Where will self-organised household producer groups and co-operatives fall in the categories – it is not clear if a group that may want to jointly access equipment for processing (for example, a small-scale milling machine) would still fall in the category of household producers. Our concern is that many of these groups may collectively earn under R50 000 a year – would these still be categorised as household producers with 10% own contribution or would they be categorised as smallholder producers with the far greater and less manageable own contribution of 35%?

## 7.2 Support requirements

### Implements

Implements for household and smallholder producers should be beyond basic production tools to facilitating efficiencies at a local level that assist in delivering nutritious, fresh and minimally processed foods into the local community – for example: micro-milling machines for meal and stock feed, food processing equipment, non-fuel water pumping equipment (e.g. ram pumps, treadle pumps etc), small-scale solar, small-scale transport such as motor-assisted bicycles and tuk-tuks etc.

How will the support for buildings, fencing and rain-water harvesting be provided? Biowatch recommends provision of funds so that the producer can choose to procure their own in-community contractor or use their own labour. The quality of delivery from contractors through government procurement (for example, the base for water tanks) has often been poor and the beneficiaries don't take adequate ownership of maintaining the asset, especially where the product that was delivered is of a poor standard.

### Extension and advisory services

Biowatch is concerned that this policy appears to go back on previous commitments to expand and skill the extension service for agrarian transformation and rural development to now be exclusively focused on supporting commodity production for value chains and leaving support for household producers to CBOs and NGOs. While we agree that NGOs have a key role to play, especially in sharing more sustainable production approaches, the number of household producers in the country is over 2 million. It is government's job to support these producers.

We are also very concerned that a "commodity-based extension approach" is further entrenching a business as usual, dominated by corporate and multinational interests in the entire value chain, which to date has created a global hunger and nutrition crisis, left farmers indebted and dependent, lead to the consolidation of enterprises and land holdings, and lead to polluted land and water, and the climate crisis.

This leads to several questions:

Does the Department envisage allocating funding support to NGOs to increase capacity for this work?  
How will the quality of extension support be assessed?

Or does the Department envisage that NGOs assisting smallholder producers would need to work together with the extension service, in which case there may be a mismatch in approaches to the kind of support given.

Could NGOs rather assist in helping to train an expanded extension service in skills in agroecological production, community facilitation, and a more holistic approach to development so that government extension can deliver an appropriate and holistic extension to producers?

Point 7.3.4 also requires household producers to report through the extension service – how will this take place if extension is not directly supporting this sector of producers.

### Marketing support

Government should be more proactive in establishing and supporting local area markets for household and smallholder producers, even if this is merely the allocation of a safe and sanitary space

for the sale of surplus production. The fostering of accessible local markets is an essential but neglected aspect of ensuring food and nutrition security by supporting producers to market quality produce at affordable prices, while earning the producer a better income than if they sold to long value chains where the middle-men extract the profit.

Biowatch supports the creation of markets for smallholder and medium scale producers in the government buying system. However, if the emphasis as stated in this policy is on priority commodities, the food entering the government procurement process will not deliver needed dietary diversity and nutrition to schools and other recipients of the food.

We are also concerned that the category of medium-scale commercial producer is actually quite a large producer, in comparison to most smallholder farmers who would operate on the lower end of the smallholder spectrum. There is a danger that it will be easier to procure from the larger suppliers, as there will be less administration and logistical challenges, and thus the medium scale producers will end up dominating this market. To ensure that government procurement really does foster the market for smallholder production perhaps 20% should be allocated to smallholders and only 10% to medium-scale producers who have greater capacity to access formal markets.

Brazil's "Fome Zero" (zero hunger) programme provides an example for government procurement, where not only did the state buy 30% of its produce for school feeding schemes and food banks from family farmers supplying diverse produce, but also paid a premium of an additional 30% for agroecological/organic produce to encourage farmers to shift to more sustainable, healthy farming practices. The state also provided appropriate extension and subsidies to support this shift.

## **8. Comprehensive electronic producer register**

While we acknowledge the need to register all producers who receive assistance to prevent duplication of grants and for monitoring and evaluation, this system should not be onerous for household producers, who may be excluded due to literacy levels or who may work in remote locations and be unable to access offices.

## **9. Policy Intervention measures**

### **9.1.2 Access to markets**

Marketing, as already mentioned, should first focus on supplying local markets with food, before seeking to compete globally. Government can do more to facilitate the establishment of vibrant local markets in terms of providing infrastructure in accessible local trading areas; looking to Participatory Guarantee Systems (PGS) between producers and consumers instead of resource intensive and costly certification standards (point ii), and appropriate technologies for food preservation and processing at the level of farmer projects/cooperatives and even households.

### **9.1.4 Access to water resources**

(iii) This should include support in repatriating and bulking local varieties of crops that are already resilient and hardy, as well as the reintroduction and breeding of traditional livestock breeds.

(iv) These technologies should as far as possible have a long life-span (for example concrete instead of plastic water tanks), avoid the need for fossil fuels (for example, ram or treadle pumps), be possible

to maintain with locally available and accessible parts, and include a training program in their maintenance as part of delivery.

#### **9.1.6 Mainstreaming of youth, women, farm dwellers and persons with disabilities**

Youth should be a separate focus to women, as involving and interesting youth in agriculture requires a different strategy.

In the household/ smallholder farming sectors the majority of producers are women (in our experience around 90%). If 90% of the funds are allocated to household and smallholder farmers, then at least 80% of total funds should be allocated to vulnerable groups. (90% of 90%)

#### **9.2.1 Technical and advisory services**

As noted above, re-skilling in the extension service must go beyond the commodity production focus to enable the extension service to adequately and holistically support smallholder producers in a range of crops and more ecological production methods.

#### **9.2.3 Agro-climatic solutions**

(iii) Crops and animals must include traditional and indigenous crops and livestock. The national gene bank and the state research institutions should play a greater role in supporting producers in repatriating these crop varieties and breeds, and not the private plant/animal breeding sectors which have different criteria for development to that of farmers.

(iv) It is not clear why only commercialised indigenous products are a focus, as there are many hardy and climate-adapted indigenous foods with the potential to provide healthy foods to consumers.

(v) Agroforestry is one of many production systems that could be used to increase the productivity of farmers, but is not suitable in all areas and ecosystems. A diversity of production systems should be explored to ensure that farmers are supported in producing in a way that is most appropriate to their climate, ecology, culture and economic circumstance.

#### **9.2.4 Provision of infrastructure including mechanisation**

Although this policy is looking to the Black Industrialist Programme as a key partner, the equipment and mechanisation provided to farmers should also look at appropriate small-scale, labour-saving devices that can be used by individual farmers or small cooperatives without needing additional inputs like diesel. Sourcing of designs for such equipment (in countries like India that have a large smallholder sector) for manufacturing in South Africa, could be a valuable technology transfer.

Technologies should go beyond 'climate smart' mechanisation and look more widely at those that will support local agroecological production.

### **9.3 Promote sustainable management and utilisation of natural resources**

#### **9.3.1 Investment in research and programme for natural resource management**

As motivated above, agroecological production practices should be implemented, and not just the narrow range of climate smart practices.

Indigenous products and knowledge systems should be supported in their entirety and not only those that are commercialised.

Climate change vulnerability analysis should be applied generally, and not just focus on efficiencies in commodities.

(iii) How will conservation practices be defined for qualification of the additional subsidy? Conservation practices should exclude the use of GMOs, herbicides and synthetic fertilisers which are proven to harm the health of ecosystems and people.

As noted above, a focus on prioritised commodities is also counter to the intent of this subsidy for better natural resource management.

#### **12.4 Funding mechanism for producer support and development**

##### **i) Blended funding instrument**

We are concerned that this 'blended funding instrument' seems to imply that the government grant under the CPDS will be provided via a 'loan' agreement, presumably through a financial institution. Provision of the government grant shouldn't be conditional of a loan if a producer doesn't wish to enter into debt. Also, by coupling the grant with a loan, the producer can come under enormous pressure from financial institutions to develop business plans and agree to a larger debt for inputs that are not necessary to their enterprise.