



biowatch
SOUTH AFRICA

biodiversity | food sovereignty | agroecology | social justice

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**Comments from Biowatch South Africa
on the Concept note on food systems transformation and the National
Food System Coordinating Committee**

Apologies for the delay in sending these comments. We have been reflecting in Biowatch on the enormity of the challenge of transforming the food system and the absolute necessity. We agree that “the country needs to build a resilient, just, inclusive and sustainable food system to ensure economic growth, social cohesion, reduce poverty, end hunger and improve food security for all.” But to build this is a monumental task, one that requires great political will and resources to pursue this when there are such divergent views on what this should encompass. We hope that DALRRD will be given the necessary support and resources to do this.

We have made some general comments and then comments on the concept note and the Terms of Reference.

Wishing you and the team great strength in taking the transformation of the food system forward; critical in the face of increasing hunger, malnutrition and extreme climate events in our country.

Kind regards

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Board Members: Prof. Loretta Feris, Dr David Fig, Prof. Mvu Ngcoya, Mr David Ntseng (chairperson),
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General comments

Given that many South Africans are failing to realise their constitutional right to food, a broad analysis of the structural, social, and ecological challenges that contribute to food insecurity and malnutrition in South Africa is needed. We are concerned that the framing of the Concept Note and the Terms of Reference (ToRs) for the proposed National Food System Coordinating Committee (NFSCC) shows a bias to that part of the food system dominated by large-scale commercial production and value chains as the main route to supply food and solve food system issues. It is this very system that underpins our current crisis, whether it be food insecurity and malnutrition or the contribution to climate change and biodiversity loss. Although corporate concentration and control in the South African food system is foregrounded, a deeper analysis of the failings of the industrial approach in the food system is lacking in the framing. It should be noted that this framing also shaped the hastily convened food system dialogues towards South Africa's national pathway as part of the UN FSS, thereby limiting the analysis of intersecting systemic problems in our food system and needed strategic actions.

Comments on Concept Note for food systems transformation for the country

2. Background

Biowatch notes that the concept and definition of 'food security' is evolving in international policy as international understanding of the realisation of the Right to food evolves. The definition of food security in the Concept note does not include the dimensions of social access (definition from the FAO's 2001 *State of Food Insecurity* report) and should be updated to: *'Food security exists when all people, at all times, have physical, **social** and economic access to sufficient, safe and nutritious food which meets their dietary needs and food preferences for an active and healthy life.'* The Social dimensions of access are crucial in terms of both ensuring that no parts of the population are excluded from food production and access but also in providing the solidarity and support that ensures access to food for many outside of the formal sector.

It is important that all 6 pillars underpinning food security are included, but these need to be fully defined as per the FAO documents and processes, including through the CFS in which this Department participates. These full definitions provide scope to include issues that currently hinder the achievement of food and nutrition security in South Africa.

So, for example, the bold text below indicates the abbreviated definition of the pillars in the concept note followed by discussion on critical aspects that are omitted by not providing the most current full definitions:

- **Access: "Refers to the affordability of food products in consideration of the preferences of individuals and households or the overall community."** This leaves out physical access to food, which may be determined by one's gender, agency, location etc.

- **Utilization:** *“Corresponds to the availability of food that is both safe and enough to meet the physiological requirements of each individual.”* While we agree that food safety is important to include, especially in relation to the chemical residues on our food, it is not clear why the fundamental aspect of nutrition has been left out. Growing malnutrition including undernutrition in pregnancy, stunting, obesity and consequent non-communicable diseases and impairment of individual development are of critical concern.
- **Stability:** *“Represents the ability of individuals, households, or their communities to secure food for current and future consumption.”* This dimension emphasises consistency of availability, access and utilisation in spite of disruptions due to weather, political instability, and economic factors such as job insecurity, food price fluctuations etc. In other words, being especially responsive to shocks.
- **Agency:** *“Denotes the capability to make individual or collective decisions about what food to produce, how it is produced, and what food to consume.”* The ability to have agency extends beyond knowledge (capability) to social and structural impediments and the power relations in society. For example, we can’t make healthy food choices if highly processed corporate foods are the only affordable option or if we are mothers who travel long distances to work while also living with energy and water insecurity and therefore cannot wash, cook or store fresh produce. Agency should also include the ability to actively participate in shaping policy.
- **Sustainability:** *“Encompasses the ability of food systems to sustain food security without compromising the needs of the future generation.”* It is important to emphasise the aspects that make up sustainability into the long-term include the protection of ecosystems and their functioning into the future in their complex interaction with social and economic systems.

3. The state of South Africa’s food system

As already mentioned, the opening paragraph is framed entirely within the industrialised food system. The language of food value chains and food supply chains excludes many vital aspects of the food system, such as informal systems, harvesting of foods from the environment, cultural aspects in the production and utilisation of food etc.

It is also not clear why the particular food system issues have been singled out, as important as they are (corporate concentration, food waste and nutrition) and other issues excluded. Of the issues highlighted some of the information is out of date and it would be useful to have the statistics referenced. There is no analysis of why these challenges exist and persist, and the underlying structural causes, globally and in the South African context. For example, the section on food waste provides general statistics without grounding the problem in the South African context. Inadequate nutrition is framed as a problem of personal choice and urbanisation.

Some of the aspects missing in the contextual description include the fundamental issues around access to land and water and the impact of extractive industries on available resources, non-farmed food from fishing etc, the impact of the unfolding energy crisis, the current focus on commodity value chains for global markets, the health impacts of the current system outside of nutrition issues, and the scale and importance of the informal parts of the food system.

4. Conclusion

The conclusion jumps to the UN FSS as the way forward in terms of the strategic actions in SA's national pathway and the overall summit action areas. The UN FSS was greatly criticised in relation to process, accountability and corporate capture. Its therefore ironic that the outcomes of this process are emphasised when the "food system in South Africa was found to be corporatised and economically concentrated".

The Concept note should also detail what government has done thus far, and the learnings from and impediments to the realisation of the targets in the Food & Nutrition Security plan of 2018 – 2023.

Comments on the Draft Terms of Reference for the National Food System Coordinating Committee (NFSCC)

General comments

➤ Power imbalances

The ToRs give no indication how power imbalances between the different stakeholders will be addressed, for example:

- how will representation be balanced across sectors – in representative numbers or in weighting of viewpoints etc,
- will there be any resources to enable participation of CSOs, small producers, informal workers etc who don't have the resources to attend, or even participate without loss of income. Also of concern are decisions being made by a simple majority and the quorum not being required for a second meeting – while one can understand that the work shouldn't be held up, if there is insufficient support to enable participation (including transport, data, airtime, accessible platforms for meeting, etc) this could lead to decisions being made by well-resourced actors who are able to be present when others aren't.

How will the process ensure that the representatives for each sector are mandated and reporting back to their sector. The informal and small-scale sector don't have the resources to mobilise and consult others, but their voices are critical. Will resources be provided to support communication between each representative and their sector? This is especially true where sectors have no organised structure or there are many small representative structures distributed across the country.

➤ **NFSCC and FNS**

Is this proposed National Food System Coordinating Committee (NFSCC) replacing the concept of the multisectoral Food and Nutrition Security (FNS) Council proposed in the Food & Nutrition Security Plan of 2018 – 2023?

➤ **MSP?**

Is a new Committee necessary if the already existing National Multi-stakeholder Platform (MSP) on Inclusive Land Governance and Agrarian Transformation could be expanded to look at the food system as well, as it was already starting to do. If a new structure is preferable can insights from the MSP on procedural issues and content be brought into this NFSCC.

➤ **Sufficient authority?**

Given the intended scope of the work of the committee, which would have ramifications on multiples levels of the food system and across Departments, will the proposed positioning of this Committee within DALRRD have sufficient authority? The multisectoral Food and Nutrition Security (FNS) Council proposed in the Food & Nutrition Security Plan of 2018 – 2023 was located in the Office of the Deputy President. This would enable coordination across departments, whereas DALRRD is now being handed the difficult task of coaxing other departments to participate in these efforts.

1. Introduction

The realisation of the Right to adequate food and nutrition should be included in the introduction and purpose of the Committee.

4. Composition of the Committee

What is the intended size of the Committee? If there are too many representatives it may become difficult to participate effectively, however, there does need to be broad and balanced representation.

How many seats will be allocated per sector to ensure balanced representation?

The current proposed composition leaves out:

- formal and informal labour
- non-farming food producers and harvesters including fishers
- the private sector label has a connotation that doesn't easily include informal traders and entrepreneurs
- consumers

6. Roles and responsibilities of the Committee

The chairperson's role is to approve the Projects and Budgets proposed by the Committee but the development of these is not explicitly mentioned in the role of the Committee.

The following responsibilities are beyond the control of a Committee as these require changes to the social and economic structures in our society including access to land and water, and need rephrasing:

- Responsible for the design and implementation of the food system in the country.
- Responsible for ensuring the implementation of the food system that is just, equitable, inclusive and sustainable.

Given the complexity of food system interactions and the links to the global economic and geopolitical processes it is simplistic and unrealistic to give the NFSCC the objective of redesigning and implementing a new food system. It might be more useful to develop some outcomes towards which the Committee can work.

7. Meetings of the Committee

The ToRs provide no detail on the procedure for calling meetings and the notice periods that may be required. Government has been notorious for calling meetings with insufficient notice and changes to meetings at the last minute. All of these will detract from meaningful participation of civil society, small producers and traders, which may not be able to respond flexibly and will find themselves left out of the decisions that are made in their absence.

8. Quorum – see above concerns

9. Monitoring & evaluation

This provides for monitoring of members participation and adherence to deadlines. How will this take place and what will be done if the monitoring finds poor participation and attendance or carrying out of tasks?

The Committee itself cannot be held accountable for food system change but can advise and support government departments which have the authority and power to create the policy environment that encourages or prohibits actions to enable the change that is needed.

10. Risks and mitigation

There is an error in the 2nd line of the table – should say meeting not monitoring.