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# Submission to the

# RDTL Ministry of Agriculture and Fisheries and

# **UN Food and Agriculture Organization**

## **From**

# La'o Hamutuk

# Regarding the

December 2013 Draft of the Timor Leste National Food and Nutrition Security Policy

**24 December 2013** 

#### Introduction

La'o Hamutuk, an active member of the Hasatil network for sustainable agriculture, is grateful for the invitation from the RDTL Ministry of Agriculture and Fisheries (MAF) and the UN Food and Agriculture Organization (FAO) to participate in this public consultation and to have the opportunity to share our perspectives during the drafting process of the Timor Leste National Food and Nutrition Security Policy. We wish that we had more time to analyze this draft, but hope that our comments will help to improve it.

#### I. General comments

## Adopt a human rights approach rather than a market approach.

We particularly appreciate the principles of respect and promotion of human rights, cultural values and food sovereignty set out in this draft, and agree that they must guide the implementation of the actions under this policy.

However, the strategies developed (especially the Strategy 1 designed to reach the Outcome 1 "Local nutritious food production increased and producers better linked to consumers") give priority to market principles and economic analysis instead of the principles mentioned above. For example, instead of designing "nutrition smart" subsidies, the draft mentions "market smart" subsidies (p.8). Instead of giving Timor-Leste Government an active social role towards its citizens, "government interventions will only be considered where the market is unable to provide effective supply services." (p.8). We believe that a market approach is not suitable to achieve social goals like the eradication of malnutrition. Improving people's health and nutrition is a public health issue that cannot be left to the private sector, whose aim is to make profit, or to the market, which links consumers and producers without any human rights considerations. Timor-Leste Government must ensure that the general goal of improving nutrition and local food production is pursued even if this is not economically profitable.

#### In the absence of reliable data, be cautious in formulating strategies.

As mentioned in this draft (pp.4, 19), there are data limitations on food and nutrition situation in Timor-Leste. Therefore, there is a risk to draw invalid conclusions and to formulate inappropriate policy actions and strategies based on beliefs or interests rather than facts. For example, increasing people's income will not significantly reduce malnutrition as evidence shows that "[...] even richer households, with less food access problems, experience relatively high levels of malnutrition" (p.4). Similarly, increasing staple food production and consumption will not reduce malnutrition if the main cause of malnutrition is a lack of protein, vitamins and minerals.

In order to base this policy on facts, comprehensive research and data collection should be undertaken.

#### **Economic growth is not a relevant indicator for this policy.**

Despite the global tendency to express social issues in economic terms, and to reduce development to economic growth, this policy should resist this bias. It must formulate a strategy to improve food and nutrition, Timorese people's health and well-being, whether it contributes or not to economic growth. Dubious statements like those in the Introduction ("Without food security there can be no sustainable economic development and without inclusive economic development national food security will not be attained." etc. p.1) should

be removed. In addition to the fact that the expressions "inclusive economic development" or "sustainable economic development" are regrettably overused and rarely coherently defined, food and nutrition issues are more related to cultural and social factors than to economic ones. For example, expensive nutritious food may be left for rituals while nutrient-poor food may be consumed for historical or political reasons.

#### > Recognize the negative impacts of a liberal trade regime on local production.

While the subsistence nature of agriculture in Timor-Leste explains low productivity and production levels, the "open and liberal trade policy regime" mentioned in this draft (p.2) is also a powerful disincentive for local production. Cheap imported food products undermine local food production and increasingly consumed industrial food contributes to malnutrition. In addition to promoting domestic production, this policy should set trade and fiscal measures to protect Timor-Leste's production from external competition.

# > Continuing to focus on self-sufficiency in staple food (especially rice) will not resolve malnutrition.

Despite the more than 10 years-old MAF-Seeds of Life research program aimed at increasing the productivity of staple food (rice, maize, sweet potatoes, cassava), no significant improvement has been made in terms of malnutrition in Timor-Leste. Therefore, instead of conducting expensive adaptive research, as suggested in Strategy 1.2, it would be more useful to focus on education (Outcome 5) and to give priority to the development of livestock, fisheries and horticulture to increase availability of highly nutritious food. These would help diversify people's diet and suppress of the rice-dependency at the origin of the so-called "hungry season".

## II. Other specific suggestions

#### • Strategy 1

- 1.1 Instead of "focusing on products for which Timor-Leste farmers have a comparative advantage", production should be focused on Timorese people needs according to their nutritious status.
- 1.2 No further investment should be made in adaptive research. A cost/benefit analysis of the current research programs should be carried out instead.
- 1.7 Instead of focusing on "improved varieties", or "locally adapted varieties" give priority to research and promotion of local (traditional, existing) varieties (by definition already adapted). Sustainable agriculture techniques like permaculture and agroecology should be disseminated among farmers.
- 1.12 Before developing micro-credit schemes, research should be conducted on savings behaviour, to avoid creating new problems related to indebtedness.

## • Strategy 2

Agriculture has a huge potential to create jobs, especially if Timor-Leste follows a sustainable agriculture model. One main objective should be to create incentives for the youth to work in the agriculture sector instead of coming to Dili.

#### • Strategy 3

Develop means to link the districts to each other, so that local production can circulate within the territory.

Imports products which are harmful for health, nutrition and Timor-Leste's environment should be banned.

#### • Strategy 4

4.6 National food feeding programs should use local production. In addition to benefit from fresh and nutritious food products, this would be a good way to support local economy.

#### • Strategy 5

Outcome and Strategy 5 should be given higher priority. If there is a lack of data and information regarding food production, there is no doubt concerning the almost inexistent knowledge on nutrition among a vast majority of the population.

The campaign on healthy food should be completed with information on the poor quality of most processed industrial food with high rates of sugar and fat.

Distributors (supermarkets, loja, etc.), hotels and restaurants should be encouraged to sell local products.

## • Strategy 6

6.4 Instead of introducing "cautiously" new crop varieties, identify existing varieties grown in the regions with extreme weather conditions, and promote crop diversification to mitigate risks.

Repair and maintenance of rural infrastructure are also an important factor of stability and resilience in food production.

## Conclusion

We thank the Ministry of Agriculture and Fisheries and the UN Food and Agriculture Organization for holding this consultation and hope that you will be able to further improve this draft. We look forward to continuing involvement in the process of developing Timor-Leste's legal framework to improve sustainable food production and nutrition.

Thank you.

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