

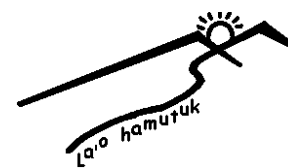
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Second Submission to the RDTL Ministry of Agriculture and Fisheries and UN Food and Agriculture Organization

From
La'o Hamutuk

Regarding the
29 April 2014 Draft of the Timor Leste National Food and
Nutrition Security Policy

30 April 2014

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Introduction

La'o Hamutuk, an active member of the Hasatil network for sustainable agriculture, is grateful for the invitation from the 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 hope that our comments will help to draft a policy that ensures the people of Timor-Leste enjoy good health and are able to live in a preserved natural environment. We also expect any draft policy based on human rights principles to put the livelihood and welfare of those responsible for food production in Timor-Leste at the centre of a food and nutrition security policy.

We acknowledge the numerous changes made in the draft Food and Nutrition Security Policy since La'o Hamutuk's first submission, many of which reflect our continuing concern that the policy is too market oriented at the expense of farmers and other food producers rights.

Amongst other things, we particularly appreciate the removal of concepts such as "market smart subsidies" and focusing on products which give a "comparative advantage". La'o Hamutuk continues its call for a proposed food sovereignty policy to focus on nutrition and livelihoods from a human rights based perspective, particularly the right to development and the right to food rather than solely focusing on market oriented ideologies.

La'o Hamutuk was disappointed to receive the most recent draft of the Policy on the 29th April, only 1 day before the final MAF/FAO workshop to validate the Policy. Despite this we were able to put together this document based on an analysis of the draft policy and consultation with a large range of stakeholders. The following comments reflect our remaining concern.

I. General comments

1) Adopt a Food Sovereignty Policy

Instead of developing a "Food and Nutrition Security Policy", the Government of Timor-Leste should develop a coherent "Food Sovereignty Policy" and acknowledge that food sovereignty is the only means to achieve genuine food security.

The crucial and strategic goal of achieving food sovereignty is already officially recognized as shown in the name of the Timor-Leste National Council on Food Security, Sovereignty and Nutrition (KONSSANTIL) and we now have the unique opportunity to translate this concept into a concrete set of objectives and strategies.

Food sovereignty, as a precondition for food security, aims at Timor-Leste's self-reliance, farmers and fishermen's empowerment, and w environmental protection. Through the adoption of a food sovereignty policy, the Timor-Leste Government will exercise its sovereign right to define and implement agriculture and food policies, and will at the same time respect, protect and fulfil a wide variety of rights, including the right to food, right to development, farmers' rights, people's economic, social and cultural rights, as well as combating malnutrition and preserving biodiversity. We expect any Policy to include these rights not only as a brief mention in a part about principles but also in practice through the development of human rights based targets, outcomes, indicators and strategies.

Considering Timor-Leste's specific characteristics, food sovereignty is not an option, it is a necessity. Indeed, Timor-Leste carries a huge food trade deficit financed by revenues from non-

renewable and soon to be depleted oil and gas resources, faces huge malnutrition rates and has fragile ecosystems. But it is also blessed with a large young workforce, fish bearing waters and a rich diversity of fruits, vegetables, roots and medicinal plants and herbs. By promoting local production of diverse organic food for local consumption, a food sovereignty policy has the potential to reduce food import dependency, eradicate malnutrition, improve living conditions in rural areas and develop productive economic sectors. By promoting sustainable agriculture practices, like agroecology or permaculture, a food sovereignty policy can contribute to preserve both the environment and people's health, and absorb a large part of the workforce. By contrast, the food security concept only focuses on permanent access to sufficient, safe and nutritious food, no matter where the food comes from, who produced it and disregarding the conditions under which it was grown.

2) Protect Timor-Leste's domestic production and support small producers

As mentioned in our first submission, cheap imported food products are a powerful disincentive for local production and prevent small farmers/producers from earning a decent living from their work, making this sector unattractive for young people. The Government must therefore put in place effective trade and fiscal protective safeguards to control imports in order to guarantee local farmers a fair price for their products and protect them against dumping. Fair prices must cover the costs of production and allow small farmers and producers to live with dignity. Food imports and aid should not impede food sovereignty. To increase income generated from food production and diversify economic activities, export of non-transformed agricultural resources should be banned.

In addition to protecting local production from external competition, Timor-Leste Government must guarantee small farmers and fishermen a fair access to food-producing resources, including access to land, water, local seeds, livestock breeds and wider agricultural biodiversity. Small farmers and fishermen must have their right to manage, use and control life-sustaining natural resources recognised by the State. Measures must also be taken to protect these resources: productive, arable lands must be protected from industrial activities and urban extension; watershed areas must be protected from deforestation; traditional seeds must be preserved and multiplied, etc.

Special attention should be given to support women, as they play a crucial role in family nutrition, farming, food preparation, culinary recipe transmission, management of family resources, etc. Increasing the number of young people interested in food production must also be a priority, using subsidies to help them start as ecological farmers, livestock breeders or fishermen.

More generally, Timor-Leste Government should develop health facilities, universities, transport and irrigation infrastructures in rural areas to avoid rural exodus.

3) Recognize the responsibility of the Timor-Leste Government to provide public services

In this draft policy, the role of the Government is often minimized at the benefit of the market and the private sector, considering government interventions only in case of market failure or to facilitate market linkages (p.3). As was previously stated, we believe that a market approach is not suitable to achieving 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 or social considerations. The 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.

The Government must play a leading role in delivering basic public services, including rural infrastructure, transport, health facilities and nutritional education. It must guarantee people's right to food and farmers' rights, especially access to productive resources.

Measures should also be taken to avoid future market and land concentration and sanctions must be defined in case of monopolistic, oligopolistic or speculative practices. The Government must also intervene when economic transactions violate the human rights mentioned above and adopt fiscal, trade and customs policies that protect the national food sector.

4) Explore the benefit of cooperatives as an alternative means of enhancing the private sector

This draft policy gives a disproportionate role to the private sector, promoting public-private partnerships, creating a private sector-friendly environment and even reinforcing farmers' dependency by deciding that "It is the private sector traders who ultimately will be the most important and sustainable link for farmers' access to input and output markets and market information" (p.3). Timor-Leste Government must ensure that private sector actors involved in the food sector give a fair price to farmers and do not unfairly compete with farmers or prevent them from diversifying and complexifying their activities. Government should also control the private sector so that no speculation or huge profits are made on food.

As an alternative to private companies, cooperatives should be promoted, as they are not only driven by economic profit but also promote social values such as solidarity, collective education and communities' empowerment. It is regrettable that cooperatives are only briefly mentioned twice in this draft policy, and only concerning marketing and credit provision activities. Helping farmers to organize themselves, reduce production cost and directly reach the consumers should be the priority of this policy.

II. Specific suggestions

We believe that it is of the utmost importance to include baselines for all targets and outputs in order that all stakeholders have a better understanding of the context in which the Policy was made.

Definitions

Many definitions of important terms are missing or incomplete and should be added, as for example:

Food sovereignty: Food sovereignty is the right of peoples, communities, and countries to define their own agricultural, labour, fishing, food and land policies, which are ecologically, socially, economically and culturally appropriate to their unique circumstances. It includes the true right to food and to produce food, which means that all people have the right to safe, nutritious and culturally appropriate food and to food producing resources (including land, water and local seeds) and the ability to sustain themselves and their societies. The food sovereignty framework is a means towards attaining food security.

Agroecology: Agroecology is the application of ecological concepts and principles to the design and management of sustainable agroecosystems. Agroecology is the discipline that provides the basic ecological principles for how to study, design and manage agroecosystems that are both productive and natural resource conserving, and that are also culturally sensitive, socially just and economically viable.

“Local” or “traditional” varieties: Refer to varieties not developed from materials from international research centers (which focus on high yielding or specific traits that reduce biodiversity and promote uniformity), like indigenous varieties or naturally adapted varieties.

Farmers’ rights: Farmers’ Rights consist of the customary rights of farmers to save, use, exchange and sell farm-saved seed and propagating material, their rights to be recognized, rewarded and supported for their contribution to the global pool of genetic resources as well as to the development of commercial varieties of plants, and to participate in decision making on issues related to crop genetic resource. Farmers’ rights also refer to farmers’ control over their seeds, land, knowledge and livelihoods.

Smallholder, small farmer/producer, etc.

Vision

Add: in a preserved natural environment

Mission

Add: The Government acknowledges...the critical role played by empowered farmers and healthy ecosystems in ensuring a healthy population

Principles

Add: Respecting and protecting farmers’ rights especially the right to access productive resources including land, seeds and water.

Policy Goal (p.15)

The goal of this policy should be food sovereignty. Add: food locally and organically produced by empowered farmers.

Key targets and Indicators

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. Priority should be given 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”.

Strategy 1

The words do not reflect a human rights based approach but a market based approach, whereas this policy should be based on the right to development and right to food. Farmers and fishermen, as the primary stakeholders in the area of food production, should be at the center of any discussion on increasing agricultural production and productivity.

A human rights based approach would also balance the macroeconomic perspective with microeconomics to make sure that economic development benefit people.

Market distortion should be removed only if it does not prevent people from enjoying their human rights. Efforts should be made to ensure that subsidies go to small farmers and other people whose lives will be directly improved.

Before encouraging farmers to produce for the market, they should be encouraged to diversify their production for their own food consumption (and their family's) to improve their health status.

Instead of giving priority to "locally-adapted varieties", give priority to the promotion of local (traditional, existing) varieties, by definition already adapted.

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.

1.3 Integrate agroecology and nutrition into extension programs. Ensure gender balance in the recruitment of extensionists and establish a participative mechanism to monitor the extensionists' activities and evaluate their work.

Strategy 2

2.4 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.

2.7 Make sure food aid does not impede food sovereignty.

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

Strategy 3

3.2 Promote biodegradable packaging and limit unnecessary waste.

3.6 Import products which are harmful for health and Timor-Leste's environment should be banned.

Strategy 4

4.3 Before developing micro-credit schemes, research should be conducted on savings behaviour, to avoid creating new problems related to indebtedness.

4.5 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 young professionals to work in the agriculture sector instead of going to Dili.

Strategy 5

5.6 Promote the use of natural and existing means to improve nutrition status, like regular moringa (marungi) consumption instead of industrial supplements.

5.7 To make consistent with the narrative add: Maintain and enhance school feeding programs *using local production and promoting school food garden.*

Strategy 6

Improve women access to productive resources including land, water and local seeds and empower them to plant gardens, raise livestock, and build water storage facilities.

Strategy 7

Add: disseminate information on the poor quality of most processed industrial food with high rates of sugar, fat and salt, including through public campaign in the local media and working with local artists (like Arte Moris)

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

Provide market vendors with the knowledge to advise consumers on healthy eating habits. Develop Timor-Leste national dietary guidelines based on local food products.

Strategy 8

8.6 Information on food and nutrition should be diffused on a regular basis to the public, and not only based on the demand.

Indicators

As we mentioned above, a baseline should be provided to be able to measure the real progress achieved and differentiate between the continuation of current trends as a result of ongoing interventions and the impact that comes about as a result of the additional value of this policy. Many indicators are too general to allow for the attribution of results achieved through the implementation of this policy. We would strongly recommend that more specific structural, procedural and outcome based indicators are made before the validation of this policy.

Conclusion

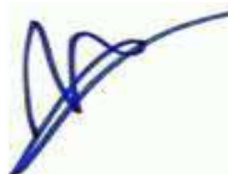
We thank the Ministry of Agriculture and Fisheries and the UN Food and Agriculture Organization for holding this consultation and hope that you will be able to further improve this draft. We look forward to continuing involvement in the process of developing Timor-Leste's legal framework to improve sustainable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

Thank you.

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