

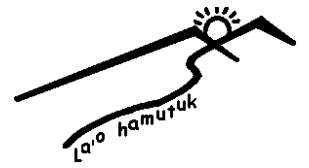
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Comments from La'o Hamutuk

on the

Draft National Action Plan

for the

Zero Hunger Challenge in Timor-Leste

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Introduction

La'o Hamutuk is grateful for the invitation from the Ministry of Agriculture and Fisheries and UN Food and Agriculture Organization to share our perspective on the Draft National Action Plan for the implementation of the Zero Hunger Challenge initiative. Unfortunately, we were unable to participate in the discussion session of the national workshop, but we attended at an earlier stage of the process the consultation with civil society organisations. With others, we were concerned about this tendency from Timor-Leste Government to respond to projects and events (often regionally or internationally-initiated) instead of focusing on a coherent national plan responding to our nation's reality and priorities. We raised doubts about the relevance and realism of the goals set in the different pillars, and questioned the global concepts used at the international level, including "hunger" and "poverty". We mentioned the lack of up-dated, comprehensive and reliable data on agriculture production, food consumption and food availability, and all agreed on the fundamental role played by education in resolving problems related to malnutrition. More than increasing agriculture productivity, behaviour change towards a more diversified and seasonal diet based on local food products (instead of rice and cheap imports) is urgently needed.

We hope our comments will help improve this draft that seems more like a patchwork of projects justifying donors, agencies and others' activities rather than a national plan.

Specific Comments

➤ Pillar 1

Activity 1.1.1.A: A better indicator could be the number of projects evaluated and subsequently changed according to the objectives of the Zero Hunger Challenge. We need to identify and address development projects and programs' weaknesses, not only counting how many people have access to these projects and programs.

Activity 1.1.C: Establishing legislation on the right to food should be a priority; the deadline mentioned (2020) is too far ahead.

Activity 1.1.1.E: The land utilization policy should also aim at protecting arable land (and protected areas) from utilization for industrial/infrastructure activities. This policy should be a priority, and should be developed before any other land related law.

Remarks: Any policy should be developed before the related law. The enactment of the land use law cannot be a precondition to the implementation of the land use policy. The Tetum and English versions do not say the same thing (the Tetum version mentions the land law whereas the English version mentions the land use law).

Activity 1.1.2.A: The mention of ACIAR-SoL as partners in this part on the promotion of consumption of diversified food like indigenous food is quite surprising.

SoL's objective is to promote the adoption of the higher-yielding crop varieties developed from introduced seeds from the CGIAR's agricultural research centers. The swift to these seeds happens at the expense of the local, indigenous varieties considered of lower quality. In addition, SoL's focus is to improve productivity of a few staple crops (maize, rice, peanut, sweet potato and cassava).

ACIAR is one of the largest funders of agricultural research for development in the world. Its mandate is to fund and commission research and development activities that benefit Australia's national interests (and partners countries' ones), and it ties its aid to Australian researchers.

More credible stakeholders with genuine motivation should be involved instead, like KSI, Permatil, Naterra.

The indicator is not specific enough, as the majority of households eat indigenous foods. An alternative indicator could be the number of households having replaced non-indigenous food by indigenous food in their diet.

Activity 1.1.2.B: It would be better to separate the two activities that are quite different: "improving water supply systems" and "promoting homestead food production". "Promoting homestead food production" could be integrated into the following activity (1.1.2.C) on family farming.

Write "eat" instead of "utilize", as the goal of the Zero Hunger Challenge initiative is above all to improve nutrition through food consumption.

The indicator "% of households utilise homestead food products" is not specific enough, as the majority of the population currently lives from subsistence agriculture, eating their food products. Alternative indicators could be: "% of households having improved their nutrition status thanks to homestead food products", or "% of households having diversified their homestead food production for their consumption".

A more appropriate baseline would indicate how many households having access to water supply use it for food production.

Activity 1.1.3.B: An additional indicator should be the % of rural youth and poor women engaged in such activities (not only trained).

Activity 1.1.4.A: Higher attention should be given to ensure these projects do not negatively impact food production and other more sustainable, long term activities. Empirical observations already show that producers in rural areas abandon their farms and wait for projects instead of continuing their productive (but less lucrative) activities. A complementary indicator could be the number of farmers/producers abandoning their activities to work on public projects.

Activities 1.1.4.C, 1.1.4.F, 1.3.3.A, 2.1.1.B, 2.1.2.E, 3.1.2.A and 3.2.2.A: Ensure the participation of a wide range of Timorese citizens in any policy/law drafting process. Add at least CSOs in the development partners.

Activities 1.1.4.D and 1.1.4.E: The school-feeding program should give priority to the use of food produced by local farmers. Additional indicators could be: "number of local producers selling their products to the school feeding program", "% of food produced locally among the food used in the school feeding program", "% of the budget allocated for the purchase of local products from small farmers".

Activity 1.2.1.A,B,C: Cf. remarks on Activity 1.1.2.A.

No international donor, agency or agricultural research center (especially linked to the CGIAR like ACIAR-SoL) should be involved in indigenous seeds inventory. Respect the sovereignty and rights of local communities over their biological resources and knowledge, and don't undermine local initiatives. Farmers and communities must have the right to refuse consent, and the right to withdraw consent or place restrictions on the activities relating to access to plant genetic resources.

Inventories, catalogues or databases may facilitate biopiracy and industry intrusion, making precious information previously conserved among farmers freely available to public. Moreover, the CGIAR has already been criticized for privileging corporate access to its breeding lines and publicly-held germplasm.

Activity 1.2.1.A: The indicator is not specific enough, as data already show that the great majority of farmers grow more than 1 crop.

The Baseline should also mention the % of households already growing at least 3 crops.

Activity 1.2.1.C: Adaptive research is costly, time and experts consuming and denies the value of existing indigenous varieties.

The indicator, in accordance with SoL's vision, presumes that indigenous seed plants and varieties need "improvement" or research before being "distributed".

Alternative indicators could be the number of indigenous seed plants and varieties available in the Loja Agrikultura mentioned in Activity 1.1.2.D, the % of farmers growing indigenous seed plants and varieties, the % of indigenous seed plants and varieties grown.

Activity 1.2.1.E: Safeguards must be put in place to ensure the agreements are profitable for both buyers and growers, especially small farmers (decent wage, farmers' control over their farm) despite the imbalance of powers between the two parties. The Government should ensure that both parties understand and accept the terms of the contract and that sustainable agricultural practices are promoted.

Activity 1.2.1.G: Should be more specific, strengthen extension service delivery through which specific activities? Are they different from those mentioned in other parts (Activity 3.1.1.C, Activities under Output 3.2.1, Activity 4.2.2.F)? Extension workers should be trained on sustainable agriculture practices (not only technology), nutrition, etc. Ensure the involvement of local CSOs in the assessment of extension services.

Outcome 1.3: Should be reformulated to recognize the link between an open, liberal trade regime and exposure to price volatility. Reducing import dependency and building a strong domestic productive economy should be a priority.

Activity 1.3.1.C: Imported products prices should be controlled to ensure cheap imports don't impede local production.

Another indicator could be: % of local producers selling their products at a fair price.

Activity 1.3.2.B: It is regrettable that the first agriculture census is only planned by 2018, instead of being given a higher priority. The lack of reliable agriculture data upon which to base policies, programs and decisions is continuously deplored.

➤ **Pillar 2**

Outcome 2.1: Timor-Leste is blessed with a large range of tropical fruits, vegetables, tubers, plants and herbs that could help prevent malnutrition if regularly consumed. Instead of promoting industrial supplement, efforts should be made to promote the consumption of plants with high nutritional values like the moringa tree (marungi).

Activity 2.1.2.B: Make consistent with Activity 2.1.2.D and Outcome 2.3. Instead of promoting vitamin A capsules, promote the regular consumption of moringa/marungi leaves, a cheap and natural alternative already part of Timorese diet and culture. In addition to providing vitamin A and iron, it contains high levels of calcium, magnesium, potassium, protein and vitamin C.

Activity 2.1.2.C: Add "local": *local* food-based dietary guidelines, as we can expect any dietary guideline to be based on food!

Activity 2.1.2.G: Any regulatory framework for food importation should aim at banning imports of junk food and reducing imports of low nutritive value food. Timor-Leste should learn from the experience of industrial countries facing high rates of

malnutrition and disease due to over-consumption of industrial products rich in salt, sugars and fat and low consumption of fresh fruits and vegetables.

Food fortification, especially for the food products mentioned (oil, salt, noodles, rice, biscuits) will encourage the consumption (and importation) of these industrial products for their added micronutrients at the expense of healthier alternative products available in Timor (fresh fruits, vegetables, herbs, etc.).

Activity 2.3.1.A: The indicator is not specific enough. An alternative indicator could be: number of portions of animal-source food consumed by a household during a week.

Output 2.4.1: Add these alternative indicators: % of households using the improved latrine; % of improved latrines in good hygienic condition.

Output 2.5.1: A campaign on the negative health impacts of junk food should be conducted in parallel; and advertising of junk/low nutrition food should be banned, as it has a huge impact on children.

Activity 2.5.1.B: Add an indicator measuring the scope of the events, like the number of participants that attended the event.

➤ **Pillar 3**

Output 3.1.1: Involve CSOs working in the field of sustainable agriculture, among others Hasatil's members.

Activity 3.1.2.D: Add an indicator on the number of abattoirs which are operational.

Activity 3.2.1.A: Involve CSOs, especially Hasatil's members in the review of the existing agricultural research programs.

Outcome 2.2 and Output 3.2.1 deal with sustainable agricultural *practices*, not technology. Activities 3.2.1.B,C,D and 3.2.2.A must be corrected to recognize the fact that sustainable agricultural practices do not depend on technology. Most sustainable farming practices actually involve specific techniques, and not technological advances, like crop rotation, crop diversity, integrated and organic pest management, soil fertility and humidity management, managed grazing, water resource management, etc.

Activity 3.3.1.C: Huge infrastructure projects like dams have a significant impact on environment and communities. Involve CSOs at an early stage of the project.

➤ **Pillar 4**

Activity 4.1.1.D: Make clear "local seed varieties" are the one traditionally used by farmers, not the ones released under SoL program. Involve relevant CSOs like Permatil, KSI, Naterra.

Activity 4.1.1.E: Support young scientists to develop cheap and simple methods of waste and post-harvest losses reduction, water resources management including rainwater (Outcome 5.1) and integrated and organic pest management.

Activity 4.1.1.H: Measures should be taken to ensure industrial high value crops cultivation does not reduce the diversity of food products produced by farmers. Smallholder farmers should be encouraged to diversify their food production for their own consumption instead of depending on income from cash crops to buy food.

Activity 4.1.4.C: Make sure the "incentives" given to extension workers reward extra-work or initiatives and not the work they get paid for.

Activity 4.1.5.A: Involve CSOs, especially Rede ba Rai members.

Output 4.1.6: Nutrition, information on local food nutritional values and ecological farming practices should also be promoted through ICT, not only agricultural innovation.

Output 4.1.7: Empower communities to manage their water resources themselves, and involve experimented CSOs like Permatil.

Output 4.2.1: Instead of focusing on micro-credit, which has the potential to create new problems related to indebtedness, savings and insurance schemes in case of crop failures should be developed. No activities related to these schemes are mentioned.

Activity 4.2.2.B: Cf. Remarks on Activity 1.2.1.E. What is the difference between this activity and the one mentioned above (Activity 1.2.1.E)?

Activity 4.2.2.E: Make the Tetum version consistent with the English one: the *Loja Agrikultura* are meant to sell *local* products. This activity is presumably the same as the Activity 1.1.2.D.

Activity 4.2.2.G: This fundamental fiscal issue should be addressed before 2025!

Activity 4.2.5.A: Developing eco/agro-tourism is an excellent idea but the tourism support facilities mentioned (roads, airports and ports) should not be the priority. Instead, increase availability of and access to information, proper accommodation, diversified local food, knowledgeable people on local fauna and flora, souvenirs, etc.

➤ **Pillar 5**

Activity 5.1.1.C: Capacity building programs are useful only if the capacities are used. Add an indicator on the number of players in the food supply chain that integrated their newly acquired knowledge into their respective activities, projects, programs.

Activity 5.1.3.D: Make consistent with the effort to reduce unnecessary waste from packaging. Promote biodegradable packaging.

Output 5.1.4: Promote the use of local, fresh food as part of effort to reduce waste (Ex: local juice instead of packaged and processed imported juice).

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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