

# Monitoring a moving target: Assessment of the implementation plan of the EU Food Security Policy Framework

*CONCORD briefing paper*

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## **CONCORD's five main recommendations**

### **1. Policy and strategy processes**

It is understandable that there be evolutions in policy and strategies over time. However, **it is indispensable that such evolutions be subject to parliamentary oversight and elaborated with the participation of civil society and beneficiaries**; small-scale farmers in partner countries in this case. They should also result in coherent strategies which reserve a central place to human rights as founding values and binding international obligations of the EU and its member states. This is not the case with the evolution of the EU Food Security Policy Framework.

### **2. Human Rights Framework**

The 2010 Food Security Policy Framework had a strong focus on the Right to Food, including political and legal frameworks and centrality of supporting strategies which tackle the root causes of hunger. This emphasis has since then significantly decreased; **it is therefore crucial to bring back the Right to Food approach to the policy**, especially in light of the recent recommitment by the European Union to a rights-based approach to development cooperation and of the centrality of human rights in the Sustainable Development Goals. There is also an **urgent need to defend small-scale producers' rights to the land they use**, whether managed communally or individually; or under statutory or customary regimes. The worrying phenomena of land grabs needs to be curbed through effective implementation of the African Union Framework and Guidelines on Land Policy in Africa and the Committee on World Food Security Voluntary Guidelines on the Governance of Tenure. This should involve refraining from financial support to large scale land investments (VGGTs art. 12.6) and a binding free, prior and informed consent requirement for all land-based investments.

### **3. Internal strategic coherence**

It is **crucial to ensure that the accretions to the Food Security Policy Framework over the past five years** – particularly those regarding a stronger role for public-private partnerships, value chains, agribusiness and agricultural intensification – **do not contradict or undermine the original focus on empowering small-scale producers, particularly women, and on promoting ecological approaches.** The goal of achieving significant increase of public investment in basic services to small-scale producers, including in infrastructure, access to productive resources, and increasing farmers' knowledge and information services needs to be kept in the front line. The EU food security policy should promote ecological agriculture practices in view of the growing evidence that they are so far the best way to build farmers' resilience to climate change, and to increase yields in the long term while respecting the environment.

**It is therefore essential that the EU – in consultation with civil society and small-scale producers' organizations – revisits the Food Security Policy Framework implementation plan to ensure that it adheres to the original commitments of the Food Security Policy Framework while including emerging issues like nutrition and resilience to climate change.** This would entail adopting a holistic food systems approach which recognises and respects the diverse functions of agriculture and the requirements of consumers, particularly those most exposed to food insecurity and malnutrition. This is particularly important given the on-going revisions of the EU Consensus on Development and the EU's Multiannual Financial Framework, both of which should keep a strong focus on inclusive agriculture development and food security.

### **4. External strategic coherence**

The private sector-oriented evolutions in the Food Security Policy Framework contradict some of the latest policy recommendations adopted in the Committee for World Food Security, particularly those regarding smallholders and markets which highlight the importance of territorial markets as compared with agribusiness-led value chains. **It is essential that the EU's policy be placed in coherence with the policy guidance of the Committee on World Food Security,** also considering the central role that the Committee on World Food Security will be playing with regard to the food security-related Sustainable Development Goals.

### **5. Monitoring methodology and practice**

In order to ensure that the EU policy and practice are grounded on solid evidence, **the methodological shortcomings in the biennial reporting methodology should be addressed.** As a priority, there is a need to adopt an approach that allows for lessons to be learned from experience.

**Space and scope should be provided for an increased engagement with civil society in designing monitoring methodology and producing the reports, which should attach far more importance to the impacts of programmes on the ground** – the economic impact, but also the social, environmental and governance impacts, since those four dimensions of development are indivisible. **Furthermore, use of qualitative assessment criteria, in addition to quantitative data, should be increased to ensure that strong empirical elements back up the conclusions drawn.** Emerging experience in the Committee on World Food Security is relevant here.

**The EU should support mechanisms to ensure contribution of small-scale producers' groups, communities and other beneficiaries in programme design and monitoring.** Producers' knowledge of agro-ecosystems, resilience, and seed and natural resource management are critical to identifying challenges and building appropriate local to continental responses.

## Introduction

The EU policy framework to assist developing countries in addressing food security challenges<sup>1</sup> or Food Security Policy Framework (FSPF or Framework)<sup>2</sup> was published in March 2010, and endorsed in Council Conclusions in May the same year. This framework formed part of the EU's response to the food price shock of 2008, which galvanised political attention on food system issues.

At the time CONCORD strongly welcomed the effort to develop an EU vision on food security challenges, highlighting in particular the Framework's emphasis on smallholder farmers and small-scale food production and the commitment to a Right to Food approach.

Four years later the EU began a regular process of reporting, every two years, on implementation of the Framework. The first biennial report was produced in 2014, and the second in 2016. Serious monitoring of the implementation of policies and their impacts is vital in order to be able to learn from experience and improve future policies and programmes. The concept of biennial reporting is therefore something that CONCORD welcomes and considers to be important.

Food and nutrition security continues to be a key policy area. The 2030 Agenda aspires to zero hunger worldwide by 2030. As well as being the explicit topic of Goal 2, food, agriculture and nutrition are deeply inter-related with many of the other goals. The Committee on World Food Security, reformed in the same wave of initiatives that led to the Framework, is providing an increasingly comprehensive range of policy guidance on food and nutrition security issues. Many of the current issues that we face, from migration to resilience to climate shocks are strongly affected by our food systems.

In view of this, this briefing paper seeks to contribute to the debate by:

- recalling the value and key points of the 2010 Food Security Policy Framework
- assessing the way in which it has since been further developed, interpreted and implemented
- making recommendations to enable the monitoring process to be a useful, high quality exercise that is able to assess impacts of programmes on the lives of those most affected by hunger and to lead to improvements in practice.

CONCORD's assessment is grounded in its own position paper on food security: *Justice, democracy and diversity in our food system*.<sup>3</sup>

## 2010 Food Security Policy Framework and subsequent developments

The Food Security Policy Framework (FSFP) was developed by the EU as part of its response to the food price shock of 2008 – an event that led also to the EU's Food Facility, the G8's L'Aquila agenda and the reform of the UN Committee on World Food Security (CFS) among others. It was developed in an open manner with public consultations, and civil society organisations – including CONCORD, were able to meet and discuss the drafting with the responsible Commission team at various points.

The Framework's rationale was the recognition that:

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<sup>1</sup> European Commission, Communication from the Commission to the Council and the European Parliament: An EU policy framework to assist developing countries in addressing food security challenges. COM(2010)127 final. Brussels, EC, 31 March 2010.

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:0127:FIN:EN:PDF>

<sup>2</sup> The term 'food and nutrition security' subsequently began being used by the Commission in preference to 'food security' although there continues to be a tendency within the Commission to address separately nutrition policy and commitments.

<sup>3</sup> CONCORD, *Justice, democracy and diversity in our food system*. Brussels: CONCORD, 2014.

<http://library.concordeurope.org/record/1537/files/DEEEP-PAPER-2015-038.pdf>

“Recent developments and future challenges require a new common food security policy, further strengthening EU leadership in the global food security agenda, and improving the effectiveness of EU assistance”.<sup>4</sup>

The Framework is characterised by three broad perspectives which CONCORD welcomed:

- focus on smallholders and small-scale food production as key not only for reducing poverty but also for increasing the availability of food generally;
- focus on the Right to Food approach, including political and legal frameworks; and
- “supporting strategies which tackle the root causes of hunger, and empowerment of marginalised groups in the design, implementation and monitoring of national programmes, as well as establishing and strengthening redress mechanisms”.<sup>5</sup>

The Framework’s analysis is structured according to the four pillars of food security<sup>6</sup> and includes points on the need for:

- “specific investment in women” (p3)
- “intensification approaches that are sustainable and ecologically efficient, respecting the diverse functions of agriculture” (p4)
- “secure access to land and secure land tenure and use rights” (p4)
- “demand-driven research and innovation in the public domain, giving sufficient attention to traditional knowledge and diversified food crops (including local varieties), and making sure that innovations are accessible to farmers and suited to their needs” (p4), adding that research and innovation should have “clear benefits for smallholder farmers” (p4) and should take account of concerns about risks
- “agriculture programmes should include a nutritional dimension” (p6).

The Framework also notes that there is a role for public-private partnerships (PPP) only “under the right conditions” (p4). Looking at governance challenges the Framework’s analysis notes the need for national and regional food security policies and strategies, better donor harmonisation by the EU and member states, and improved coherence of international governance through rapid reform of the CFS.

The Framework then identifies four priorities (pp8-9):

- Improve smallholder resilience and rural livelihoods
- Support effective governance
- Support regional agriculture and food security policies
- Strengthen assistance mechanisms for vulnerable population groups.

Of these the first is developed in most detail, outlining again the need for ‘ecologically efficient’ intensification for small-scale producers, especially women, and for demand-led research. The latter refers to the need for research to be driven from the bottom up by the needs of farmers. It also emphasises the need for:

“greater participation of civil society and farmer organisations in policy making and research programmes” (p9).

The Framework was endorsed in Council Conclusions in May 2010, which also requested the Commission to develop an implementation plan by the end of 2010. Implementation however became a somewhat drawn-out process, delayed by restructuring of the EU’s development cooperation institutions and affected by changing priorities. The following table outlines key documents and milestones in the process, which led eventually to an implementation plan in 2013

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<sup>4</sup> Framework, <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:0127:FIN:EN:PDF> p2.

<sup>5</sup> Framework, <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:0127:FIN:EN:PDF> p5.

<sup>6</sup> The four pillars of food security, as stated by the World Summit on Food Security in 2009, are availability, access, utilization, and stability.

and the first report on implementation of the framework in 2014. In the meantime, in September 2012 CONCORD shared with the Commission its recommendations for the implementation plan.<sup>7</sup>

When	What
<b>March 2010</b>	<p>Commission Communication: <a href="#">EU policy framework to assist developing countries in addressing food security challenges</a></p> <p>“provide a common policy framework for the EU and its Member States in the fight against world hunger and malnutrition”</p> <p>“concentrates on enhancing the incomes of smallholder farmers and the resilience of vulnerable communities”</p> <p>“access to food can be improved by applying the ‘Right-to-Food’ approach”</p> <p>Includes four priorities (see above). Under first priority is a point on “ecologically efficient agricultural intensification”</p>
<b>May 2010</b>	<p>Council Conclusions: <a href="#">EU policy framework to assist developing countries in addressing food security challenges</a></p> <p>“emphasises the potential of poor and smallholder producers to sustainably contribute to meeting future food demand”</p> <p>“recalls it is important to reinforce all levels of food security governance, including the local level,... based on the Right to Food principles”</p> <p>“invites the Commission to propose an implementation plan”</p>
<b>2010 2011</b>	<p><i>Drafting of implementation plan begins but stalls due to reorganisation and merger of DG DEV and DG AIDCO into DG DEVCO</i></p>
<b>July 2011</b>	<p><a href="#">EP Report</a> on an EU policy framework to assist developing countries in addressing food security challenges, followed by a <a href="#">Parliament resolution</a> in September 2011.</p> <p>Welcomes the framework, particularly its human rights foundation, its focus on sustainable smallholder agriculture (especially women) and agro-ecological production systems.</p> <p>Calls on Commission to continue ongoing consultation processes with civil society and small scale producers’ organizations.</p> <p>Underlines importance of PCD particularly regarding CAP, trade, energy and research.</p>
<b>Oct 2011</b>	<p>Commission Communication: <a href="#">Increasing the impact of EU Development Policy: an Agenda for Change</a></p>
<b>March 2012</b>	<p>Special Report by European Court of Auditors: <a href="#">Effectiveness of European Union development aid for food security in sub-Saharan Africa</a></p> <p>“Commission has not placed adequate emphasis on nutrition”</p> <p>“Only half of the interventions have reasonable prospects of being sustainable”</p> <p>Recommends for a structured assessment of the food security situation in each country and a systematic consideration of the potential scope for support by the EEAS and the Commission's programming of Union development aid.</p>
<b>May 2012</b>	<p>Council Conclusions: <a href="#">Increasing the Impact of EU Development policy: an Agenda for Change</a></p> <p>“leveraging private sector participation and resources”</p>
	<p><i>Drafting resumed on FSPF implementation plan, now as a Staff Working Document; initially for late 2012 but then delayed so that it could incorporate aspects from Communications on resilience and nutrition (see below).</i></p>

<sup>7</sup> CONCORD, Recommendations for an implementation plan of the EU Food Security Policy Framework. Brussels: CONCORD, 2012. <http://library.concordeurope.org/record/1859/files/DEEEP-REPORT-2017-002.pdf>

When	What
<b>Oct 2012</b>	Commission Communication: <a href="#">The EU approach to resilience: learning from food security crises</a>
<b>Dec 2012</b>	<a href="#">EP Report</a> , reiterating key messages of the ECA Special Report of March 2012
<b>March 2013</b>	Commission Communication: <a href="#">Enhancing maternal and child nutrition in external assistance: an EU policy framework</a>
<b>March 2013</b>	<p>Implementation of the Framework</p> <p>Staff Working Document: <a href="#">Boosting food and nutrition security through EU action: implementing our commitments</a></p> <p>Performance criteria that are largely quantitative.</p> <p>Six priorities:</p> <ol style="list-style-type: none"> <li>1. Improve smallholder resilience and rural livelihoods</li> <li>2. Support effective governance</li> <li>3. Support regional agriculture and food and nutrition security policies</li> <li>4. Strengthen social protection mechanisms for food and nutrition security, particularly for vulnerable population groups</li> <li>5. Enhance nutrition, in particular for mothers, infants and children</li> <li>6. Enhance coordination between development and humanitarian actors to build resilience and promote sustainable food and nutrition security</li> </ol> <p>Under first priority is a point on “sustainable agricultural intensification and diversification” indicative of subtle change from 2010 wording: “intensification approaches that are sustainable and ecologically efficient, respecting the diverse functions of agriculture”.</p>
<b>May 2013</b>	Council Conclusions: <a href="#">EU approach to resilience</a>
<b>May 2014</b>	Commission Communication: <a href="#">A stronger role of the private sector in achieving inclusive and sustainable growth in developing countries</a>
<b>Dec 2014</b>	<p>Report from the Commission</p> <p><a href="#">Implementing EU food and nutrition security policy commitments: first biennial report and accompanying Staff Working Document</a></p> <p>Largely quantitative listing and analysis of resources disbursed, number of programmes, etc.</p> <p>Focussed essentially on coherence, complementarity and coordination (3Cs) between the EU and member states.</p>
<b>May 2015</b>	<p>Council Conclusions on the first biennial report on implementing EU food and nutrition security policy commitments</p> <p>“recognises the importance of this accountability tool”</p> <p>“suggests focusing on selected policy priorities, and putting more emphasis on results and impact assessment ... notes the need to improve the quality of data reported”</p> <p>“step up efforts to communicate the joint achievements”</p>



When	What
<p><b>June 2016</b></p>	<p>Report and Staff Working Document combined: <a href="#">Implementing EU food and nutrition security policy commitments: second biennial report</a></p> <p>Focus on ‘Enhanced nutrition’ and ‘Inclusive agrifood chains and systems’. The latter is not one of the priorities in either the Framework or the implementation document.</p> <p>All case studies are on international value chains</p> <p>Absence of the Right to Food</p> <p>Use of ‘success stories’</p>
<p><b>June 2016</b></p>	<p>Council Conclusions on food and nutrition security: <a href="#">Implementing EU food and nutrition security policy commitments, second biennial report</a></p> <p>“the Commission is requested to coordinate with EU Member States to propose common indicators and efficient methodologies that could facilitate the aggregation of results towards the relevant SDGs”</p> <p>“Continued emphasis should be put on [...] ensuring equal access to resources for women as well as to strengthening the (climate) resilience of vulnerable communities”</p> <p>“Enhance mechanisms to boost responsible private sector engagement and investment, and learn from inclusive business models”</p> <p>“vital to ensure that small-scale family farmers can take advantage of responsible domestic, regional and global value chains, and help deliver inclusive and sustainable growth in the agricultural sector. In this respect the Council encourages the creation of effective public-private partnerships that ensure governance mechanisms in which producer - and civil society organisations have a voice”</p>

## Key points of divergence between the Framework and its implementation plan

The implementation plan for the Framework was eventually produced as a Staff Working Document rather than a Communication: *Boosting food and nutrition security through EU action: implementing our commitments* (2013)<sup>8</sup>. It is the key interpretation of the Framework, in that the biennial reports respond more directly to the implementation document than to the Framework itself. The implementation document was discussed in the Working Party on Development Cooperation (CODEV) of the Council but was not opened to consultation with the EP or with civil society as the Framework had been. It is important to recognise, therefore, that the implementation document has several important differences from the Framework.

The interpretative implementation document has six priorities rather than four – the four priorities from the Framework, plus two representing the Communications that had been issued in the intervening three years on resilience and nutrition. It turns these priorities into a scorecard, assigning to each priority several expected areas for programme interventions and performance criteria.

The interventions are akin to the sub-points under the priorities in the original Framework, however they are not identical. For instance, in the first intervention, what was termed in the Framework “ecologically efficient agricultural intensification” becomes in the implementation document “sustainable agricultural intensification”. The emphasis on an ecological aspect has been lost and ‘sustainable intensification’ is a much looser and more controversial concept – although it is defined

<sup>8</sup> European Commission, Commission staff working document: Boosting food and nutrition security through EU action: implementing our commitments. SWD(2013) 104 final. Brussels: EC, 27 March 2013. [https://ec.europa.eu/europeaid/sites/devco/files/working-paper-food-nutrition-security-swd2013104-20130327\\_en\\_5.pdf](https://ec.europa.eu/europeaid/sites/devco/files/working-paper-food-nutrition-security-swd2013104-20130327_en_5.pdf)

by some to include constructive aspects, in practice it has become a catch-all phrase used by many powerful actors to justify business as usual and industrial approaches to intensification.

Looking particularly at the first priority (Improve smallholder resilience and rural livelihoods) for illustration, the most significant changes are:

- Loss of the ecological dimension.
- Stronger focus on public private partnerships (PPPs) as the central instrument for achieving objectives. PPPs were referred to in the Framework, but with qualifications. Where the Framework mentioned “national policies, strategies and legal frameworks”, the implementation document only mentions PPPs.
- On research, there is no longer mention of the public domain, traditional knowledge or the need to regulate and manage risks.
- Inclusion of value chains within the priorities (they were mentioned in the Framework in connection with the need for improved regulatory conditions) and a new reference to farmers developing agribusinesses.

However the implementation document does reiterate other key points from the Framework:

- Emphasis on the Right to Food, including implementation of the Voluntary Guidelines on the Right to Food<sup>9</sup>
- Need to strengthen civil society and farmers organisations and improve their ability to participate in decision-making and the implementation and evaluation of programmes

It also strengthens one aspect:

- Women’s empowerment, including the need for women to be integrated into decision making (although no reference is made to the fact that women require not just generic empowerment but recognition of their specific needs and constraints in the field of agriculture via gender-sensitive policies and budgeting, and recognition of their inalienable human rights).

The performance criteria are predominantly quantitative. Of nineteen criteria, thirteen are on the number and value of programmes or exercises, leaving little space for a qualitative assessment. This methodological choice creates a weakness that runs throughout the subsequent biennial implementation reports. When it came to the actual implementation and writing of the reports, the spreadsheet that the member states were given only asked about types and levels of activities and amounts of disbursements, without any space to provide any qualitative assessment of the project. This means that the implementation reports simply did not have the data to make any meaningful assessment of impact. This was further complicated by a lack of any uniform system of data-gathering between and among the EU and member states.

## Biennial implementation reports

### 1. 2014 Report

The 2014 report, *Implementing EU food and nutrition security policy commitments: first biennial report*,<sup>10</sup> set out to answer two questions:

1. How were the disbursements and specific interventions made in 2012 aligned with the six policy priorities?

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<sup>9</sup> FAO, Voluntary Guidelines to support the progressive realization of the right to adequate food in the context of national food security. Rome: FAO, 2005. <http://www.fao.org/3/a-y7937e.pdf>

<sup>10</sup> EC, Report from the Commission to the European Parliament and the Council: Implementing EU food and nutrition security policy commitments: first biennial report. COM(2014) 712 final. Brussels, EC, 2 Dec 2014. [https://ec.europa.eu/europeaid/sites/devco/files/communication-eu-food-nutrition-commitments-first-biennial-report-com2014-712-20141202\\_en.pdf](https://ec.europa.eu/europeaid/sites/devco/files/communication-eu-food-nutrition-commitments-first-biennial-report-com2014-712-20141202_en.pdf)



2. How did the EU and its Member States adhere to the 3Cs of coherence, complementarity and coordination in addressing these priorities?

As a consequence, the report and its annexed Staff Working Document<sup>11</sup> read as highly quantitative lists, charts and tables of resources allocated, percentages of funds distributed – geographically and by priority, numbers of programmes supported, etc. The Staff Working Document does include four case studies, but they are analysed only through the lens of the 3 Cs. In other words, the point of view is only that of institutional coordination and dialogue, rather than that of the impacts that they had on the ground.

This surface level, quantitative approach is unconvincing in terms of the effect and impact of programmes. The report states that, for instance, for the first priority – to improve smallholder resilience and rural livelihoods, €2.02 billion was disbursed on 1560 programmes in 108 countries or at international level. However the issues addressed within this priority area – intensification and diversification, access to land and other resources, addressing the impacts of climate change, etc – are all highly complex, context dependent and usually political. This approach tells us nothing about whether the programmes had any of their intended effects, whether the intended effects in fact met the needs of small-scale food producers and people vulnerable to hunger, or how to improve policies and programming.

The report reflects the 2013 implementation document rather than the original Framework in that it makes no mention of ecological efficiency or the diverse functions of agriculture, while referring to value chains and agribusiness interventions.

The Right to Food is mentioned in the report, but loses the centrality that it had in both the Framework and the implementation document. The Right to Food is not seen as an operational tool, as there is no reference to any specific project or intervention that was funded in order to protect, respect or fulfil it, nor to any assessment or evaluation of the way in which member states and the EU respect it. Instead it is treated purely as an abstract item of debate that is discussed in international conferences and roundtables to which the EU and its member states contributed.

Some of the methodological shortcomings were recognised in the Council Conclusions responding to the report, which for future reports suggested “focusing on selected policy priorities, and putting more emphasis on results and impact assessment ... notes the need to improve the quality of data reported”. The Council also asked the Commission to “step up efforts to communicate the joint achievements”.<sup>12</sup>

## 2. 2016 Report

The 2016 report, *Implementing EU food and nutrition security policy commitments: second biennial report*,<sup>13</sup> responds to the Council’s request to focus on selected policy priorities by picking two. One is the fifth priority, to enhance nutrition. However the second is not one of the priorities in either the Framework or the implementation document. It is ‘inclusive agrifood chains and systems’. Although this is not explicitly spelled out, this appears to be a further reinterpretation of part of the fifth intervention area of the first priority (Improve smallholder resilience and rural livelihoods)

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<sup>11</sup> [https://ec.europa.eu/europeaid/sites/devco/files/swd-implementing-eu-food-nutrition-security-policy-commitments-first-biennial-report-2014-343-20141202\\_en.pdf](https://ec.europa.eu/europeaid/sites/devco/files/swd-implementing-eu-food-nutrition-security-policy-commitments-first-biennial-report-2014-343-20141202_en.pdf)

<sup>12</sup> Council of the European Union, Outcome of the Council meeting: 3391st Council meeting: foreign affairs, development. Brussels, EU, 26 May 2015, p7.

<http://www.consilium.europa.eu/en/workarea/downloadAsset.aspx?id=40802196949>

<sup>13</sup> EC, Report from the Commission to the European Parliament and the Council: Implementing EU food and nutrition security policy commitments: second biennial report. COM(2016) 244 final. Brussels, EC, 6 June 2016. <http://bit.ly/2eS1vwW>

where terminology on value chains and agribusiness was introduced in the implementation document.

This reinterpretation is problematic in itself because it reflects a significant change in the strategic vision of how to fight food insecurity and improve rural livelihoods. Whereas the vision that underlies the 2010 Framework was the subject of broad discussion, this subsequent evolution has not been a matter of public debate. The reinterpretation also enables the report to use case studies that do not focus on smallholder livelihoods holistically, but instead look only at long production and market chains connecting to international trade and consumer markets in the global north. Globally more than 80% of smallholders operate in local and domestic food markets. These highly diverse markets, in which most of the food consumed in the world transits, are vital for food security. They are also more remunerative for most smallholders than international value chains. Those smallholders who are able to engage in international value chains are a minority of the already better-off producers and tend to be men.<sup>14</sup> Furthermore, the reinterpretation contrasts with the policy recommendations on 'Connecting Smallholders to Markets' recently adopted in the CFS with the support of the EU.

Any reference to the Right to Food has disappeared from the 2016 report. This is extremely concerning, given not only its prominence in the Framework and the implementation document, but also the adoption by the EU in 2014 of a rights based approach to all of its development cooperation.<sup>15</sup> The Right to Food is one of the strongest tools in the fight against hunger and for the EU to set this tool down is troubling.

There is reference to land rights in the sample reporting of results, however at least one of these is in connection with titling exercises, which are an area of great complexity. If titling exercises are not done sensitively, taking into account the intricacy of legitimate land use claims in line with the Voluntary Guidelines on Tenure<sup>16</sup>, they can lead to dispossession and conflict.

On the positive side, there is reference in the report to women's rights, in the context of the EU Gender Action Plan, although this is not built upon in the subsequent analysis.

There continues to be no reference to ecology.

The report takes up the Council's request to better communicate achievements. However the manner in which it does so is overly simplistic, telling 'success stories' to the exclusion of any room for learning lessons from challenges and problems encountered. This is illustrated by one of the case studies, that of the Sustainable Trade Initiative (known by its Dutch acronym, IDH), which the report succinctly claimed "is clearly having an impact". However, an assessment of the Initiative undertaken in 2014 for the Dutch government identified several significant limitations<sup>17</sup>:

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<sup>14</sup> CFS, Connecting smallholders to markets: recommendations. Rome: CFS, 2016. [http://www.fao.org/fileadmin/templates/cfs/Docs1516/OEWG\\_Small/CFS\\_Connecting\\_Smallholders\\_to\\_Markets\\_Final\\_Draft.pdf](http://www.fao.org/fileadmin/templates/cfs/Docs1516/OEWG_Small/CFS_Connecting_Smallholders_to_Markets_Final_Draft.pdf); Connecting Smallholders to Markets: an analytical guide. CSM, 2016. <http://www.csm4cfs.org/connecting-smallholders-markets-analytical-guide/>

<sup>15</sup> Council of the European Union, Council conclusions on a rights-based approach to development cooperation, encompassing all human rights: Foreign Affairs (Development) Council meeting, Brussels 19 May 2014. [http://www.consilium.europa.eu/uedocs/cms\\_data/docs/pressdata/EN/foraff/142682.pdf](http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/EN/foraff/142682.pdf)

<sup>16</sup> The Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security, endorsed in May 2012. <http://www.fao.org/nr/tenure/voluntary-guidelines/en/>

<sup>17</sup> Ministry of Foreign Affairs of the Netherlands, IOB review: riding the wave of sustainable commodity sourcing. The Hague, Ministry of Foreign Affairs of the Netherlands, 2014. <https://www.government.nl/documents/reports/2015/04/28/iob-riding-the-wave-of-sustainable-commodity-sourcing-review-of-the-sustainable-trade-initiative-idh-2008-2013>

The Sustainable Trade Initiative builds public private coalitions to develop sector improvement plans for internationally traded agricultural commodities such as cotton, coffee, tea, cocoa, timber and fish, based around voluntary sustainability standards. It was assessed in 2014 in a review for the Dutch government by its Evaluation Department (IOB).

That review notably highlighted the following concerns:

- Insufficient attention to constructing an up market for the sustainable goods that smallholders are encouraged to produce.
- In most of the cases the farmer's increased income from production is balanced out by an increase in costs leaving no overall benefit in income. The review asks whether the certification efforts may not be 'certifying poverty'.
- The initiative exposes farmers to the volatility of international prices.
- Some of the projects focused on 'low-hanging fruit' – large-scale farmers instead of smallholders and more vulnerable producers – and often put them in competition for the same market.
- The initiative is increasingly shifting from interventions that address private sector actors in a sector broadly, to identifying private sector 'champions' and supporting them. The review questions the use of public resources in this way, particularly when it increases the dependency of small-scale producers on one buyer.

### **3. Key shortcomings in reporting methodology**

From this review, some key points emerge in the methodology of the biennial implementation reports. These shortcomings should be addressed in view of producing future reports, in order to ensure policy and practice is grounded on solid evidence:

- Predominant use of quantitative rather than qualitative assessment criteria. The 2014 report already contained a recommendation to improve this practice but only little was changed with the 2016 report leaving much room for improvement.
- Selective examples (success stories) and silenced failures don't allow for lessons to be learned. For example, the 2014 report states that "coordination at country level should move beyond information sharing", however it does not offer examples, case studies or elements to effectively understand the limits of national coordination and, from this lesson, move on.
- Problems in both quantitative and qualitative data as a result of lack of uniform data gathering between and among the EU and member states.
- Omission of strong empirical elements to support some of the statements made in the report, including references. For example, the 2016 report includes case studies on Sustainable Cocoa-Business School<sup>18</sup> and the Sustainable Trade Initiative, making reference to quantitative improvements. The report refers to independent reviews that were conducted to assess the projects but does not contain any reference or link that could be used to get more information on the source and its methodology.
- Mechanisms and forms of reporting do not provide scope for engagement with civil society in the production of the report. Because of their presence and experience on the ground CSOs are in a position to provide valuable insights into the impacts of interventions at local levels. CONCORD has tried from the outset to engage with the Commission on developing the methodology and participating in the assessments but with no success, with the sole

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<sup>18</sup> Sustainable Cocoa Business and Cocoa-Food Link Programme (source for Textbox 4, page 9 of the Report)

exception of the Ethiopia case study conducted by the Italian government in the context of the first report.

## Recommendations

### 1. Policy and strategy processes

It is understandable that there be evolutions in policy and strategies over time. However, **it is indispensable that such evolutions be subject to parliamentary oversight and elaborated with the participation of civil society and beneficiaries**; small-scale farmers in partner countries in this case. They should also result in coherent strategies which reserve a central place to human rights as founding values and binding international obligations of the EU and its member states. This is not the case with the evolution of the EU Food Security Policy Framework.

### 2. Human Rights Framework

The 2010 Food Security Policy Framework had a strong focus on the Right to Food, including political and legal frameworks and centrality of supporting strategies which tackle the root causes of hunger. This emphasis has since then significantly decreased; **it is therefore crucial to bring back the Right to Food approach to the policy**, especially in light of the recent recommitment by the European Union to a rights-based approach to development cooperation and of the centrality of human rights in the SDGs. There is also an **urgent need to defend small-scale producers' rights to the land they use**, whether managed communally or individually; or under statutory or customary regimes. The worrying phenomena of land grabs needs to be curbed through effective implementation of the African Union Framework and Guidelines on Land Policy in Africa and the CFS Voluntary Guidelines on the Governance of Tenure. This should involve refraining from financial support to large scale land investments (VGGTs art. 12.6) and a binding free, prior and informed consent (FPIC) requirement for all land-based investments.

### 3. Internal strategic coherence

It is **crucial to ensure that the accretions to the FSPF over the past five years** – particularly those regarding a stronger role for PPPs, value chains, agribusiness and agricultural intensification – **do not contradict or undermine the original focus on empowering small-scale producers, particularly women, and on promoting ecological approaches**. The goal of achieving significant increase of public investment in basic services to small-scale producers, including in infrastructure, access to productive resources, and increasing farmers' knowledge and information services needs to be kept in the front line. The EU food security policy should promote ecological agriculture practices in view of the growing evidence that they are so far the best way to build farmers' resilience to climate change, and to increase yields in the long term while respecting the environment.

**It is therefore essential that the EU – in consultation with civil society and small-scale producers' organizations – revisits the FSPF implementation plan to ensure that it adheres to the original commitments of the FSPF while including emerging issues like nutrition and resilience to climate change**. This would entail adopting a holistic food systems approach which recognises and respects the diverse functions of agriculture and the requirements of consumers, particularly those most exposed to food insecurity and malnutrition. This is particularly important given the on-going revisions of the EU Consensus on Development and the EU's Multiannual Financial Framework, both of which should keep a strong focus on inclusive agriculture development and food security.

### 4. External strategic coherence

The private sector-oriented evolutions in the FSPF contradict some of the latest policy recommendations adopted in the Committee for World Food Security, particularly those regarding

smallholders and markets which highlight the importance of territorial markets as compared with agribusiness-led value chains. **It is essential that the EU's policy be placed in coherence with the policy guidance of the CFS**, also considering the central role that the CFS will be playing with regard to the food security-related SDGs.

## ***5. Monitoring methodology and practice***

In order to ensure that the EU policy and practice are grounded on solid evidence, **the methodological shortcomings in the biennial reporting methodology should be addressed**. As a priority, there is a need to adopt an approach that allows for lessons to be learned from experience.

**Space and scope should be provided for an increased engagement with civil society in designing monitoring methodology and producing the reports, which should attach far more importance to the impacts of programmes on the ground** – the economic impact, but also the social, environmental and governance impacts, since those four dimensions of development are indivisible. **Furthermore, use of qualitative assessment criteria, in addition to quantitative data, should be increased to ensure that strong empirical elements back up the conclusions drawn**. Emerging experience in the CFS is relevant here.

**The EU should support mechanisms to ensure contribution of small-scale producers' groups, communities and other beneficiaries in programme design and monitoring**. Producers' knowledge of agro-ecosystems, resilience, and seed and natural resource management are critical to identifying challenges and building appropriate local to continental responses.

## **About this briefing**

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