

April 15, 2016

Committee on World Food Security  
Secretariat  
Food and Agriculture Organization of the United Nations  
Viale delle Terme di Caracalla  
00153, Rome Italy

**Dear CFS Secretariat,**

The Coventry University Centre for Agroecology, Water and Resilience welcomes the Zero Draft of the set of recommendations on Connecting Smallholders to Markets. We are writing to provide comment on this draft at this early stage to help further improve this important piece of work and the important role that that the CFS plays in supporting smallholder farmers around the world.

The Centre for Agroecology, Water and Resilience (CAWR) at Coventry University drives innovative, transdisciplinary research on the understanding and development of resilient food and water systems internationally. We have reviewed the Zero draft and find many of the recommendations to be appropriate and to reflect important aspects of policy and practice that can help to better connect smallholders to markets. At the same time, we wish to submit additional commentary where we feel that improvements could be made.

First, we applaud the CFS for recognizing the importance of informal, local and territorial food systems as fundamental to ensuring the food and nutritional security of small and family farmers. While global commodity markets can provide important sources of income for some family farmers, the costs of entry are often too high (transaction costs) and the pressures towards economies of scale and standardisation create substantial barriers for smallholders. Thus, where smallholders are disadvantaged in global commodity markets, they often engage in a wide range of alternative marketing channels where opportunities arise to achieve food and nutrition security and rural livelihoods through supporting and enhancing local and territorial food systems. Here, smallholders generally have greater

control over the conditions of exchange and prices they can obtain and consumers are often able to access more highly nutritious, fresh and less-processed foods.

It is clear that there is a need for further evidence and understanding of the form, function, challenges and importance of local and territorial food systems in the global south and there is a need for research that examines territorial markets at all levels (national, regional, global). First, we propose that the recommendations should indicate that research should be carried out with organizations of smallholder farmers to ensure the research reflects local needs and priorities. Second, it would be important to indicate that further research would focus on both quantitative measures at a national level (e.g. the FAO's Smallholders Dataportrait indicated in the current draft), but also in-depth research that examine the policies, dynamics, innovations and the enabling environment to enhance local markets.

We would also suggest that more emphasis be placed on addressing how food safety and phytosanitary regulations can undermine the stability, growth and effectiveness of local markets. While it is obviously important to ensure food safety, it is important to develop scale and context appropriate hygienic and sanitary regulations that are suited to the requirements of smallholders, small-scale processing and local markets. Many regulatory systems are constructed based on large-scale industrial food systems and place smallholders at a great disadvantage.

Agroecological approaches should be promoted to increase smallholder productivity and resilience and promote rural employment diversification that mitigates the impact of risks and shocks in agricultural income. Agroecological systems are based on a holistic and circular economy model. In terms of markets, it is thus important to not only consider the downstream markets, but also the upstream markets and interconnections between smallholder farmers through the sale, purchase, bartering and exchange of farm inputs. For example, it is vitally important to understand and support farmer control over and exchange of seeds and livestock breeds.

The section on public procurement provides some useful guidance for institutional food buyers. However, we feel this section could go further, in three ways. First, governments should enact legislation that encourages or requires institutions to procure locally to support local markets. Secondly, the recommendations should insist that public

procurement pay fair prices to producers. Third, there should be a focus on supporting the development of cooperatives to act as a farmer-owned intermediary between institutions, who often have demands in terms of scale and standardization that are difficult or impossible for smallholders to fulfill as individuals.

The points on the governance of territorial markets and local food systems should be further elaborated to ensure that smallholders and farmer organizations are empowered in decision-making. One important innovation, around the world, is through local food councils which bring farmers and other civil society actors as active participants in the decision making forum rather than as passive contributors to consultation processes.

Finally, we recommend that further attention be placed on critically examining the relationship between Global, bilateral, and regional treaties and agreements, and smallholder access to markets. These agreements, and the policies that underlie them, often undermine the capacity of local communities to develop and access local markets. Currently, many of these policies, treaties and agreements promote trade liberalization encouraging larger and more globalised producers and distributors. The structural changes in agricultural, food and phytosanitary regulations have had the effect of compromising the capacity of local and smaller producers to develop and access local markets, and of consumers to benefit from such local production. Governments should be enabled to grant exemptions from or apply moratoriums to international regulations and agreements in areas such as food safety or public procurement where these rules undermine smallholder access to territorial markets.

Thank you for the opportunity to comment on the Zero draft and we look forward to seeing the final recommendations.

Yours Truly,



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