



Alliance for Sustainable and Holistic Agriculture (ASHA)

Response to draft National Food Security Bill 2011

To
Under Secretary (NFSA),
Department of Food & Public Distribution,
Room No. 459,
Krishi Bhawan, New Delhi-110001

Dear Sir

Sub: Response to draft National Food Security Bill, 2011, put up by the Department of Food & Public Distribution, Ministry of Consumer Affairs, Food & Public Distribution, Government of India

This is with reference to the recently released draft National Food Security Bill by your Ministry for comments.

Alliance for Sustainable and Holistic Agriculture (ASHA) is a large nationwide network of organizations and individuals working for sustainable agriculture and economic security for all agricultural families. While ASHA welcomes the initiative by the Government of India to create a statutory framework for ensuring food security, we are deeply concerned about the serious shortcomings in the Bill both with respect to ensuring access to adequate, nutritious food to everyone and with respect to addressing the broader aspects of national food security including food production. We are afraid that unless these serious shortcomings are addressed, true Food Security would remain an unfulfilled promise. We are placing our collective concerns before your Ministry through this letter and hope that the Bill is suitably revised before placing in the Parliament.

In light of the levels of hunger, malnutrition and destitution in the country, and the fact that India ranks 126 on Human Development Index and below our neighbours like Pakistan and Bangladesh on the Multi-dimensional Poverty Index, there is no doubt that hunger and its underlying factors should become the highest priority to the nation.

Alliance for Sustainable and Holistic Agriculture, (ASHA)

A-124/6, First Floor, **Katwaria Sarai**, New Delhi 110 016

Ph: Dr. Ramanjaneyulu (09000699702), Kavitha Kuruganti (09393001550), Kiran Vissa (09701705743)

Email: ramoo@csa-india.org, kavitha_kuruganti@yahoo.com, kiranvissa@gmail.com

On behalf of ASHA, we are first enunciating our in-principle concerns and disagreements with the draft Bill below, followed by specific recommendations which flow out of these concerns.

- (1) ASHA fundamentally believes that the current hunger, malnourishment and rural poverty are manifestations of the deep underlying agrarian crisis and structural inequities with regard to access and control over productive resources, which need to be addressed immediately. The important point to be noted in any statutory mechanism related to ensuring food security and eradicating hunger and malnourishment is that the largest number of poor and undernourished persons are in rural India; ironically, it is rural Indians who produce food for the entire nation, even as they are poor food consumers.
- (2) Long term food security of the people and the nation can be ensured ONLY through KISAN SWARAJ i.e., (a) a sustainable and viable production process, and (b) producers having equitable access and control over their productive resources. This can be achieved only by ensuring livelihood and income security for the agricultural producer community, especially the small/marginal farmers and agricultural labourers, along with ensuring that diverse, nutritious and safe food is produced in an ecologically sustainable manner. We believe that livelihood security for agricultural households and remunerative prices to farmers should be an essential part of the Food Security Bill.
- (3) Right to food means assured physical, economic and social access to adequate, locally grown and culturally appropriate, diverse, safe, affordable and nutritious food and other requirements of good nutrition for all residents of the country, at all times, necessary to lead an active and health life with dignity. Without ensuring the various elements of food security as given above, including ensuring that sustainable and viable food production is seen as an integral part of food security, we will not be able to effectively eradicate hunger and malnourishment in this country. The stated objective of the Bill “to provide for food and nutritional security in human life cycle approach, by ensuring access to adequate quantity of quality food at affordable prices, for people to live a life with dignity” is not being met by this Bill.
- (4) The Bill has no mechanisms proposed at all to ensure that all the hungry and malnourished in the country are indeed covered adequately through the statute, to prevent hunger and malnourishment. In this context, what the Bill mentions around poverty estimates, priority households and general households is very problematic. Similarly inclusion of Cash Transfer provisions undermine the basic goal of providing real access to food.
- (5) The Bill doesn't provide for a diverse set of food grains; it does not mention pulses and oils, and the inclusion of coarse grains is only indicative and not prescriptive. Expanding the scope of the PDS to include millets, pulses and oilseeds will go a long way in addressing malnourishment. Further, these foods are predominantly from dryland crops, take less resources for cultivation and are the mainstay of sustainable production system in the vast rainfed areas. Mandatory inclusion of these would restore balance to the nutrition as well as cultivation systems of the country which have been distorted by the overemphasis on the major cereals rice and wheat.
- (6) The Food Security Bill should not include provisions that pave way for corporatization of the food system. Instead, it should be geared towards livelihoods and employments within

communities, and local control of the food system. Provisions such as “ready-to-eat” meals go against this principle, in addition to the problems with health and nutrition aspects of such food.

- (7) The Bill does not contain any provisions to incentivize food production, to ensure that resources for food production are not diverted or grabbed, and no provisions for decentralized procurement and storage that would benefit the farmers.
- (8) The Government should compulsorily ensure that provision of low-cost food should not create a downward pressure on procurement prices resulting in unremunerative prices for farmers. This could also tend to reduce the market price for food grains. There needs to be a guarantee within the Food Security Bill itself of remunerative prices for producers. Otherwise, the proposed food security system could have the unintended consequence of increasing the unfair burden on the agricultural community which would exacerbate the rural distress in the country, which is already the case in the country.

In this context we strongly demand the following:

- I. The definition of Food grains in Chapter I
 - a. Section (2) f, may be broadened as “foodgrains” means rice, wheat or coarse grains, pulses and oils
 - b. Section (2) k, the definition of meal is a cooked meal or “ready to eat meal” or take home ration, as prescribed by the Central Government. The words “locally produced and cooked” should be inserted in the definition, and ready to eat food should be deleted.
- II. The definition of Food Security in Section (1) g may be broadened as
 - a. “food security” means the production and supply of adequate quantity of nutritious, diverse and safe food specified under Chapters II, III and IV
- III. Under Schedule IV **Provisions for Advancing Food Security**
 - a. Section (1) c may be modified as ensuring livelihood security to farmers by way of remunerative prices, access to inputs, credit, irrigation, power, crop insurance, etc.
 - b. Section (1) e may be inserted ‘ensuring access and control over agricultural resources to agricultural families’.
- IV. For all other Enabling Provisions for Advancing Food Security specified under Schedule IV, the Act should specify a timeline, ideally, of two years, to bring them into implementation.
- V. It is not appropriate to put entitlements for Sections 4, 5 and 6 under other specific schemes – instead this Bill itself should provide for the schemes and their implementation.
- VI. Chapter IX and X should explicitly define the Localised procurement within a 10 kms radius.

- VII. We oppose the Cash Transfer provisions which have the danger of becoming an escape for the government from its obligations to actually ensure access to food, and also to
- VIII. Oversight, monitoring and transparent governance at the end of delivery of the entitlements to citizens should be strengthened. Similarly, there should be such oversight and monitoring systems and mechanisms at the procurement and storage end too.
- IX. Strong Grievance Redressal mechanism should be put in place, on the lines of the draft Bill proposed by National Advisory Council.
- X. In addition, the Bill in its final form must ensure that all problems like levy, restrictions on movement of food grains between districts and states which exists today in states like AP must be addressed.
- XI. This legislation should not in anyway be linking issue prices with Minimum Support Prices (MSPs) as in Schedule I, as it would reinforce the tendency to keep the MSPs low. Further, it is not clear what the “Derived Minimum Support Price” for rice is (Schedule I, Page 23).
- XII. A national Food Security legislation should include a directive restricting the conversion of agricultural land towards non-agricultural purposes.
- XIII. Access to safe food must be ensured in addition to it being nutritious. In this regard government should ensure that no Genetically Modified food enters the food chain; it should prioritize and promote food produced without the use of agro-chemicals.
- XIV. The Bill should have an explicit provision against import of food grains to meet the food security needs; As an alliance that works with farmers around the country, ASHA asserts that the farmers of India are very much capable of meeting the current and future production and procurement needs for ensuring food security of the nation – *provided* that remunerative prices and incentives are given for food production, and diversion of agricultural land to non-agricultural purposes is prevented. A food security system that relies on imports while neglecting the production systems and producer community in the country is not meaningful.

In the light of production-related concerns being raised about the viability of the Food Security Bill, ASHA emphasizes that the most effective response by the Government of India to those concerns would be to place the provisions for remunerative prices and protection of farmers’ resources as an essential portion of the Food Security Bill. This would make farmers and agricultural workers of the nation true partners in this endeavour to provide food security to its people, and they will surely rise to the challenge now and in the future.