



Alliance for Sustainable Holistic Agriculture (ASHA)

Food • Farmers • Freedom

To

September 4, 2019

Shri Devendra Fadnavis
Chairperson, High Powered CMs' Committee on Transformation of Indian Agriculture and
Hon'ble Chief Minister,
Government of Maharashtra.

Dr Ramesh Chand,
Member Secretary, High Powered CMs' Committee on Transformation of Indian Agriculture,
Member, NITI Aayog,
Government of India.

Dear Sirs,

Sub: INPUTS FOR THE CONSIDERATION OF THE HIGH POWERED COMMITTEE OF CHIEF MINISTERS ON TRANSFORMATION OF INDIAN AGRICULTURE

Alliance for Sustainable & Holistic Agriculture (also known as ASHA-Kisan Swaraj Network) is a large national network of organisations and individuals, working to promote sustainable and dignified farm livelihoods in India. Key members of ASHA have been part of various expert committees, task forces and high level committees on critical aspects of Indian agriculture, including working groups on Doubling Farmers' Income by 2022. We welcome the formation of the High Powered Chief Ministers' Committee on Transformation of Indian Agriculture, and hope that you will help chalk out a sustainable path for Indian agriculture.

We would like to hereby submit detailed inputs to the Committee, under 3 broad themes: (A) Inclusive Approach to all Sections of Farmers, (B) Transformation to Ecologically Sustainable Agriculture, and (C) Ensuring Economic Security for Agricultural Households.

We are ready to share more detailed policy briefs and analysis on any of the topics. We would also be happy to make a presentation in person before the Panel.

We believe that the issues to be addressed with regard to Indian agriculture include (a) lack of profitability (with a problem of plenty in many commodities), (b) imperative to find resilience to climate change, (c) revival of degraded environmental resources, and (d) improving nutrition security of the country through diverse safe foods. Our policy focus should be on those farmers who have been rendered invisible, and those whose incomes are significantly lower than national average and that strategically - focusing on these groups of farmers and such states of India with low farm incomes creates higher possibilities for definite outcomes.

(A) Inclusive Approach to all Sections of Farmers

A1. Comprehensive Farmers' Registry in India

Establish a comprehensive Farmers' Registry in India, which would be a system to identify and register all farmers in the country and issue them Kisan Cards – including tenant farmers, sharecroppers, women farmers, adivasi farmers, landless cultivators and

livestock-rearers, who are all defined as “Farmers” in the National Farmers’ Policy 2007. The Kisan Card holders should be entitled to get agricultural credit from banks, crop insurance, disaster compensation, and all government schemes. Such a system should lend identity to currently invisible and marginalised farmers, and also bring about equity in scheme benefit distribution in the country.

A2. Legal Entitlements to Real Cultivators

Increasingly, the cultivation of land is being done in large proportion by tenant farmers and sharecroppers leasing in land from the land-owners, reaching beyond 50% of landholdings in some states. But the support systems and government schemes are almost exclusively tied to land ownership. Hence tenant farmers are completely left out of these, making them the most vulnerable to debt trap and farm suicides. It is a scandal of tens of thousands of crores that a substantial portion of interest subvention, crop insurance, PM-KISAN, disaster compensation, etc. is going to non-cultivators – especially as more subsidies and incentives are sought to be converted to cash support. Transforming Indian agriculture requires legal entitlement for the real cultivators. In fact, DBT schemes should not be taken forward unless this issue is sorted, since the vested interest of non-cultivating farmers will become more entrenched in rendering the actual cultivators invisible, when such DBT schemes become full-blown in operation.

Recommendations:

- A legislation is required to entitle the actual cultivators to all support systems, even when they are not owners of the land.
- The Model Land Leasing Act of NITI Ayog assures the rights of land-owners but does not provide clear rights to the cultivators or define government responsibilities. Hence, a new model Cultivators’ Rights Act should be brought, based on consultation with tenant farmer organizations and experiences of some state laws.
- The onus should be on the government to identify the cultivators involving local verification through Gram Sabha or similar mechanism. Expecting land owners to sign written agreements is impractical under most circumstances. While the law should protect the ownership rights of the land owner, it should clearly entitle the cultivators to the support systems.
- Once an effective new Model Act is adopted, the Centre should push States to adopt it by making Central provisions like interest subvention and crop insurance contingent on adopting a Cultivators’ Rights Act.
- New DBT schemes should be contingent on mechanism to identify real cultivators.

Action Suggested: All states should bring out a Cultivators’ Rights Act; Centre should bring out a model Act which improves on some serious shortcomings of the Model Land Leasing Act and incentivize states to adopt it immediately.

A3. Focus on both Farmers in a household – Ensuring women farmers’ rights and entitlements

Though the policy discourse has begun acknowledging the enormous contribution of women farmers to Indian agriculture, no concrete measures have been taken up yet on visibilising and empowering women farmers. In fact, at the national level, there is an alarming trend of de-feminisation of agriculture which needs to be addressed urgently.

Recommendations:

- a. Ensure recognition and provide full entitlements/support to women farmers on par with male farmers. Special schemes and support systems for single-women-headed farm families. Enact a Women Farmers’ Entitlements statute for the purpose.

- b. Ensure that DBT amounts for income and/or cultivation support under different schemes go at least into joint bank accounts of cultivator and spouse, though there is ample justification given the gendered land ownership disparities that exist, for the amount to be transferred entirely into the woman farmer's account.
- c. Facilitate, through enactment of appropriate statutes, women farmers' collective farming including on leased in land. Research evidence suggests that such farming is more profitable than family farming, especially when state government provides backward and forward linkages as in the case of Kudumbashree's women farmers' collective farming experience (in Kerala).
- d. Provide land rights and pattas to women in terms of full implementation of inheritance laws, with special drives for measures such as joint titling of land in the names of husbands and wives, and mutation of land in the name of women successors.
- e. Provide relief and rehabilitation to women farmers in farm suicide families including one time settlement of outstanding debts.
- f. Empower women's self help groups to manage village commons so that the most marginalised amongst (women) farmers get access to better livelihoods through livestock rearing, forest produce gathering etc.

A4. Rights of Adivasi Farmers and Protection of Adivasi agriculture

- a. Proper implementation of Forest Rights Act (2006) and PESA Act (Panchayatraj Extension to of Scheduled Areas to protect adivasi agriculture and living. Ensure that CAMPA funds are managed by local gram sabhas, without monoculture plantations destroying local ecosystems and economies.
- b. Establishing a locally appropriate ecological agriculture paradigm in adivasi areas that recognises the forest-agriculture-food cultures-community continuum that exists with forest-dependent Adivasi communities and strive to establish organic zones.
- c. Ensure the inclusion of adivasi farmers in all government support systems such as crop insurance, disaster compensation, procurement system and DBT schemes.

(B) Transformation to Ecologically Sustainable Agriculture

B1. Agro-Ecology to ensure food and nutrition security

Agro-ecology is a broad and (post-modern) scientific approach to agriculture production. Agro-ecology is being practiced across India under many names (organic farming, natural farming, zero budget natural farming, permaculture, etc). It is the application of ecological principles in agriculture production systems so as to ensure sustainable development of farmers including agricultural workers and ensure food and nutrition security, and improve climate change resilience. Agro-ecology can contribute to the production and consumption of healthy and nutritious food and boost local economies and markets. When climate change is creating more problems for farmers as well as governments, it is important to look at the potential and vulnerabilities of different agro ecosystems and plan agriculture production accordingly. The potential of agro-ecological approaches like organic farming for carbon sequestration is well-established.

The groundwater crisis, the destruction of farm ecology and pollinators, and the poisoning of food and water systems show that we have reached the end-point of the chemical intensive agriculture. On the other hand, the International Conference on Organic Agriculture and Food Security (2007) held by FAO presented two important findings: 1)

Sustainable intensification in developing countries through organic practices would increase production by 56 %. 2) Organic farms use 33-56% less energy per hectare. In India, a study by the ASSOCHAM for Madhya Pradesh shows that organic agriculture can lead to wealth accumulation of Rs.23,000 crore, generate exports worth Rs.600 crore and create nearly 60 lakh employment across the state over a period of 5 years. ICAR's All India Network Project on Organic Farming show that out of the 28 crops tested, 21 crops show production increase by 5-20 percent, across various states. The findings from this ICAR project clearly show that food security concerns around large scale organic farming adoption are clearly misplaced.

India should embrace a **Transformational shift to Agro-ecology** as the central approach to agricultural production. This has a huge potential to make agriculture climate resilient, improve the income of farmers, improve soil health, ensure food and nutrition security and diversity – all without harming the environment.

Recommendations:

- a. Adopt an Agro-Ecology Policy for India which requires a transformational shift to Agro-ecology, with a 10-year action plan and sufficient budget allocation.
- b. Re-orient the agricultural research, education and extension systems to help this transition to Agro-Ecology. Start Agroecology education in schools and make it part of curriculum.
- c. Thousands of experienced practitioners and dedicated organizations across states with expertise on agro-ecological farming should be made partners and resource persons in this transition.
- d. State level assessment of potential should be done by 2020, especially taking in to consideration climate change.
- e. Start an effective campaign among consumers about safe and nutritious food.
- f. Support organic farmers' groups for marketing, especially domestic market and ensure that any food safety regulations do not penalize organic farmers excessively, without concomitant support to organic producers in comparison with chemical farmers.
- g. Start a flagship programme of reviving traditional seed diversity in farmers' fields, to meet a variety of objectives including better nutrition and climate resilience.

B2. Banning and Phasing Out Synthetic Pesticides

Pesticides, that too those that have been banned in other countries of the world, but being produced/used in India are a cause for concern, for their adverse ecological, human health as well as economic implications. The unconscionable deaths and hospitalisations from acute pesticide poisonings is a story not just from Maharashtra but other states too. The (post-modern) science of pest management has been successfully proven on the ground in states like Andhra Pradesh, which shows us that synthetic pesticides are indeed dispensable and should be avoided in our agriculture. It is seen from the NSSO 70th Round findings on Situation Assessment Survey of Agricultural Households that pesticides constitute the fourth largest cost component of upto 8% in the expenditure incurred for crop cultivation. A saving here is not only likely to add to incomes of farmers, but will also most probably lead to savings on healthcare expenditure too. It is in this backdrop, that we request the High Powered Panel to recommend the following measures.

Recommendations:

- Ban those pesticides that have been banned in other countries for health and environmental reasons – including herbicides like glyphosate and glufosinate;

- Overhaul the pesticides regulatory regime by ensuring that no pesticides are registered without a needs and alternatives assessment, followed by independent, long term rigorous studies with transparency in regulation. State governments should be given the authority to prohibit pesticides that are not required and suitable, or are being used in unsafe and unapproved manner in their jurisdictions. These elements are right now missing in the Pesticides Management Bill pending in the Parliament.
- Take up large scale extension on sustainable pest management using NPM (Non Pesticidal Management of crops) approaches, with successful farmers used as community resource persons for effective grassroots extension.

Action suggested: Ban pesticides that have been banned elsewhere, overhaul the pesticides regulatory regime by changing Pesticides Management Bill substantially and promote NPM on a large scale.

B3. Payment for Eco-System Services

The era of direct income transfers (DITs) has begun in India with the Centre initiating PM-KISAN and several states carrying on DBT-based schemes for income augmentation or cultivation support. On this, apart from requesting that the government ensure that the benefits go to real Cultivators (connected with Point 1 on Farmers' Registry), ASHA proposes that such DITs be converted into Payment for Eco-System Services, which will ensure that payments are linked to ecological stewardship exhibited by farmers. There can be slab systems created for numerous components that will enhance climate resilience, soil health revival, non-chemical cultivation, water harvesting and use efficiency, and carbon sequestration. Such incentives will not only enhance farmers' incomes, but have a scientific and ecological basis for building environmental sustainability in farming.

Action suggested: Convert DBTs to cultivators and other farmers into Payments for Eco-Systems Services to ensure environmental sustainability in farming.

B4. No dilution of the seeds-related part of Essential Commodities Act

While the High-Powered Panel is discussing the Essential Commodities Act mainly in the context of over-regulation affected remunerative price realisation by farmers, it should be noted that ECA 1955 is the only available legislation at this point of time, for regulation of seed quality and prices in India. Given that the Seeds Bill pending in the Parliament since 2004 has not seen any worthwhile pro-farmer improvements in all these years, it is important that ECA should not be diluted in any manner on seeds.

Action suggested: ECA 1955 should not be altered in any way as pertaining to the regulation of Seeds under the Act (through the Seeds Control Order of 1983).

B5. Genetically Modified Crops and Foods

Twenty three years after its first commercial release, GM technology is widely regarded as a failed technology as its claims of increasing yields and food security, reduced chemical pesticide usage, increased incomes and being safe for health and environment have been proven as false. Most countries continue to refuse to grow GM crops, including 17 of the 20 most developed countries, and China is drastically reducing its GM crop area. Of the 38 countries that once grew GM crops, only 24 did so by 2017. Yields depend largely on the quality of seeds into which the two traits of Bt and HT, which account for 99% of all GM crop areas, are inserted. India ranked 34th out of 77 countries on cotton yield in 2019 and 24 countries ahead of India do not grow GM cotton. India's average cotton yields (CAI) rose by 69% (278kg/ha to 470 kg/ha) between 2000 and 2005, when Bt cotton was 6% of total cotton area, but by only 6% between 2006 and 2019 (472 kg/ha to 506 kg/ha). This was

despite doubling of fertiliser use, almost full transition to hybrid cotton seeds and increased irrigation. GM cotton did not decrease pesticide use and various pesticides are being used in larger volumes and intensity in Indian cotton than when Bt cotton was first introduced. Bt toxin is more toxic than natural Bt sprays and constant exposure to it makes the target pest resistant to it. Insecticide use has also been increasing due to sucking pests proliferating on cotton. Over 87% of GM crops are Herbicide Tolerant, and this leads to liberal spraying of a single herbicide, usually glyphosate based, resulting in the proliferation of 'super weeds' resistant to it along with increased use of deadly herbicides.

Glyphosate was declared as a probable human carcinogen by WHO in 2015. US Courts have recently awarded about a billion dollars in damages in 3 cases of cancer caused by Monsanto's glyphosate based herbicide. There are 18000 more legal suits being filed. Indian studies also point to adverse impacts of glyphosate including carcinogenic potential. A compilation of 400 peer reviewed studies on the adverse impacts of genetically modified crops is available as of 2013 and can be accessed at www.indiagminfo.org but there are many more studies after 2013 indicating risks from GM crops and the chemicals used with them. Private profits are made at public cost. Studies show that GM crops and their associated chemicals impact soil microbes, endangered species, pest controlling and pollinating insects. Herbicides sprayed on HT crops in India's small farms will destroy availability of uncultivated foods and mixed cropping, destroy employment, spread herbicides to neighbouring farms and ensure a rapid and harmful takeover by GM HT crops. There are also serious trade security concerns with GM crop contamination, as has been witnessed in large scale rejection of GM-contaminated export consignments from the USA by countries around the world.

Meanwhile, global demand for organic is growing at 25% pa. India has the world's largest number of organic farmers. GM presence is not accepted in organic produce, as seen in India's loss of its organic cotton exports. It is against the above backdrop that we seek the following from the Panel:

- a. Immediately halt illegal Bt Brinjal, HT cotton and HT soya cultivation by tracing and placing deterrent punishment and damages on suppliers of these. Farmers should be compensated and amounts recovered from suppliers for the necessary destruction of illegal GM crops. Ensure that the event developer is made liable for any illegal GM crop cultivation in the country by required statutory changes.
- b. Halt imports of any GM products into the country. Ensure checking of all imports at point of entry and implementation of the action to make all seeds unviable for germination.
- c. Do educational programmes with farmers on the dangers of GM crops and provide extension support for numerous alternatives that exist for improved yields, non-chemical and non-GM pest and weed management.
- d. Educate farmers and ban glyphosate sale/use everywhere, including online sales.
- e. Halt all GM open air trials/release as these are known sources of illegal spread. Follow the recommendations of the Supreme Court Technical Expert Committee's majority report of independent scientists, including ones nominated by the Government of India.

(C) Ensuring Economic Security for Agricultural Households

C1. Income Security for all Farming Households

- a. Adopt a *Farmers' Income Security policy*, whose target is that all farming families should achieve a minimum dignified income level. This income level should be achieved through various policy measures such as remunerative prices, disaster compensation, insurance,

credit, lowering the cost of agriculture, better market access, etc. If certain categories of farmers still fall short of the income level, they will be provided a targeted income support.

b. Set up a *statutory Farmers' Income Commission*, produce annual estimates of farm household income and a farm income index, and make recommendations to achieve minimum living income – including all policy measures such as prices, insurance, input subsidies, and allied activities.

c. Take measures towards a statutory income guarantee regime for all farm households.

C2. Institutional Credit and Protection from Debt Trap

Agriculture being an enterprise taken up by more than 50% of Indian workforce, the government should ensure adequate financing and a protection from debt trap. These are minimum requirements for any enterprise, especially agriculture which is a risky but essential production activity for the nation. While industry is seen as an enterprise and wealth creator, it is built on systems like limited liability, bankruptcy protection and many incentives and financing systems. Agriculture being the biggest employment generator and a truly valuable production activity, deserves such systems.

Recommendations:

a. Institutional Credit should be guaranteed to all sections of farmers including tenant farmers, sharecroppers, women farmers, adivasis farmers and livestock-rearers – preferably based on the Comprehensive Farmers' Registry described in A1.

b. A comprehensive **Agricultural Debt Relief Act** should be enacted, which will provide the equivalent of bankruptcy protection and limited liability for farmers – so that when they make a loss due to climate or other factors out of their control, they don't fall in a debt trap.

b. A **Farmers' Debt Relief Commission** should be established under the Act, which identifies Distressed Areas and Distressed Crops in every season, and recommend concrete measures to provide debt relief for the distressed farmers. This would extend to not only bank loans but also private loans.

d. Existing Money Lending Regulation Acts should be implemented strictly to curb predatory and usurious lending. Debt-Swap schemes should be implemented at a large scale to convert private loans into bank loans.

C3. Disaster Compensation and Crop Insurance

The impact of one or more disasters or calamities, whether drought, floods, cyclones or hailstorms, can destroy the production in a season – leading to a net loss to the farmer. Without a system to recover this loss, farmers will increasingly end up in debt trap in the era of climate change. Currently, the Calamity Relief mechanism and PMFBY together are proving insufficient to help majority of the farmers recover their losses.

Recommendations:

a. A comprehensive system that combines the Calamity Relief and Crop Insurance should be adopted. Under this system, at a basic level, every cultivator should be automatically registered. The first universal level of compensation for crop loss is available to all affected farmers/cultivators through remuneration.

b. The second level of insurance can be based on enrolment through payment of premium. The PMFBY scheme should be improved drastically to make sure that all major crops are covered with Village as a unit, that there is transparency and

accountability for the insurance companies, and that the agriculture departments should be made nodal agencies for implementation of PG.

C4. Remunerative Prices, MSP, Marketing and FPOs

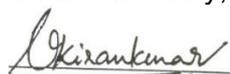
- a. Enact an MSP Guarantee Act which will ensure that the announced MSPs are realized by all farmers as a right, with various mechanisms such as Public Procurement, Market Intervention, Price Deficiency Payments, and ensuring that the auctions in any APMC markets or eNAM markets do not start below MSP.
- b. Ensure decentralised procurement of all food crops including millets, pulses and oilseeds in addition to rice and wheat, at MSP and distribution at subsidized rates through the PDS.
- c. Support formation of Farmer Producer Organisations on a large scale by investing on organising, capacity building, working capital and infrastructure for storage, processing and value addition. We need schemes that have enhanced investments for establishing and building capacities of FPOs, with longer scheme durations of 5-7 years (3 years is a short period for such schemes). Since FPOs cannot be expected to immediately get profitable with just credit based schemes, there should be some new grant+credit schemes. FPOs should be exempted from the GST regime.
- d. Improve farmers' bargaining capacity to deal with markets – by ensuring that farmer organizations move up the value chain.

C5. Trade Agreements

- a. Stop all trade agreements like Regional Comprehensive Economic Partnership and EU-India Free Trade Agreement which create uneven playing field for Indian farmers in terms of dumping of highly subsidised products, often at the expense of environmental degradation at the export points too. RCEP is particularly worrisome with its potential adverse impacts on our milk producers. This is acknowledged by NITI Aayog, Punjab State Farmers Commission and state governments like Kerala.
- b. All existing and future trade agreements should be reviewed for their detrimental effect on Indian farmers with respect to impact on prices and markets, IPR clauses which erode our autonomy with regard to seed and food sovereignty, investor protection clauses which dilute safeguards for farmers' rights including land rights.

We thank you for your attention to all the points placed before you, and we hope that the Committee will give due consideration to this submission from ASHA in its report and recommendations. We would be glad to have an opportunity to make a presentation in person to you on these matters.

Yours sincerely,



Kirankumar Vissa

On behalf of the National Steering Committee,
Alliance for Sustainable and Holistic Agriculture (ASHA)

Phone No: 09701705743; Email address: kiranvissa@gmail.com