

African Centre for Biosafety



Comments on:
National Strategy on Agroecology

30 November 2012

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Introduction

The African Centre for Biosafety (ACB) is a non-profit organisation, based in Johannesburg, South Africa. It was established to protect Africa's biodiversity, traditional knowledge, food production systems, culture and diversity, from the threats posed by genetic engineering in food and agriculture. It has in addition to its work in the field of genetic engineering, also opposed biopiracy, agrofuels and the Green Revolution push in Africa, as it strongly supports social justice, equity and ecological sustainability.

The ACB has a respected record of evidence based work and can play a vital role in the agro-ecological movement by striving towards seed sovereignty, built upon the values of equal access to and use of resources.

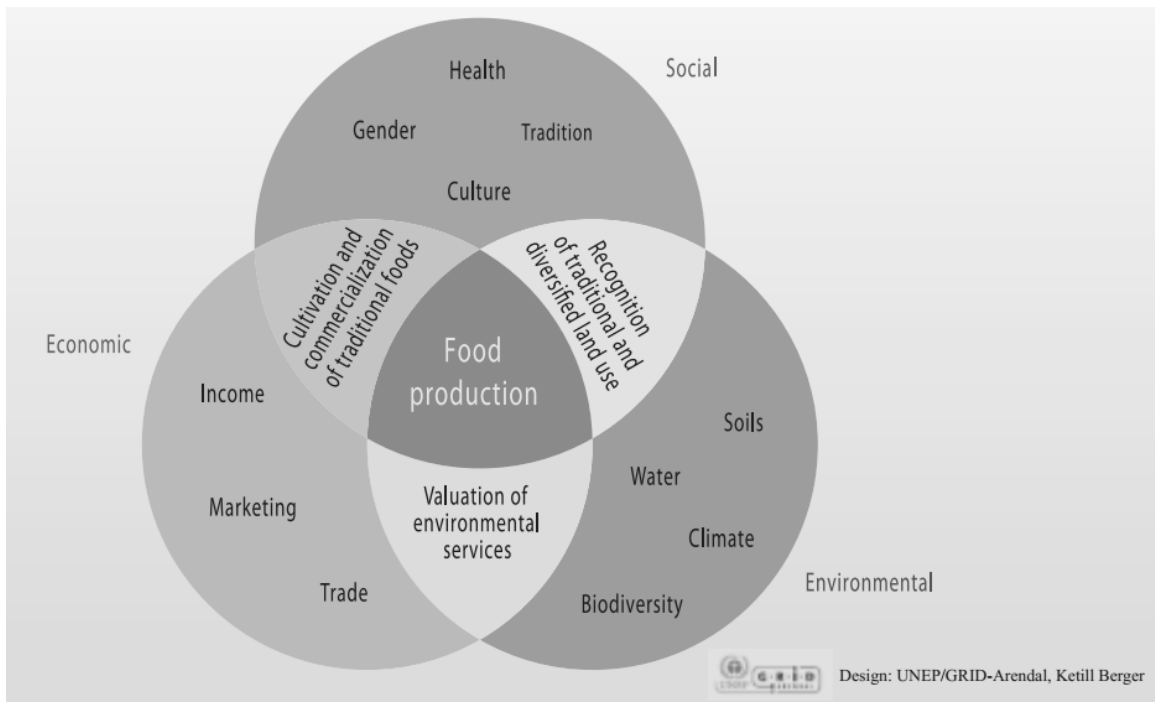
Background – the international community shift to agroecology

In 2002 the Food and Agriculture Organisation (FAO) and the World Bank commissioned what has become known as the “biggest ever review of global agricultural food production and the underlying causes for continued and growing hunger and starvation: the International Assessment of Knowledge, Science and Technology, or IAASTD for shortⁱ. The multi-stakeholder process, which lasted 3 years and involved over 400 experts and over 100 countries, produced ground breaking insights into our global agricultural system and persistent hunger and recommended a complete shift in agricultural policy, away from the so-called Green Revolution. The report signalled the need to end the post-war chemical-based food production system that has been aggressively promoted since the 1950's, if we are to meet the United Nations Millennium Development Goals and avert living in “a world nobody would want to inhabit”ⁱⁱ. The synthesis report advised global governments that,

“Technologies such as high-yielding crop varieties, agrochemicals and mechanization have primarily benefited the better-resourced groups in society and transnational corporations, rather than the most vulnerable ones”ⁱⁱⁱ and found that:

“Small-scale diversified farming is responsible for the lion's share of agriculture globally. While productivity increases may be achieved faster in high input, large scale, specialised farming systems, greatest scope for improving livelihood and equity exist in small-scale, diversified production systems in developing countries”^{iv}.

A key insight from the research was that agriculture is not solely about increasing yield and producing food commodities, but has a “multi-functional” role to play in society, the complexity of which is explained in the graphic below. According to IAASTD, an “agroecological approach recognizes the multifunctional dimensions of agriculture and facilitates progress toward a broad range of equitable and sustainable development goals. A wide variety of technologies, practices and innovations including local and traditional knowledge draw on the science of agroecology”^v. Very importantly, the report also highlighted the need to address the needs of amongst others, fisher folk, urban and rural poor and women.



The inescapable interconnectedness of agriculture's different roles and functions.

Source: International Assessment of Agricultural Knowledge, Science and Technology for Development. 2009. Synthesis, Global and Regional

IAASTD makes a clear call to governments to address poverty and hunger through proactive and bold policies rather than relying on any kind of “techno-fix”, recognizing that “existing rules and policies and dominant institutional arrangements have shaped today’s food systems, and are largely responsible for the extreme inequities in access to food and resources seen today. For example, the influence of transnational agribusiness over public policy formation has contributed to the establishment or interpretation of institutions (such as global markets, trade and intellectual property rules) in ways that have eroded food and livelihood security in the poorest countries”^{vi}.

The IAASTD report was approved by 54 governments in Johannesburg in 2008, regrettably, South Africa was not amongst the signatories. In addition, with the findings pointing toward the need for low-cost, low-tech agricultural solutions, agribusiness unequivocally withdrew their participation from and support for the report - as CropLife CEO Howard Minigh put it, ‘...it would be counterproductive for us to endorse the current draft’^{vii}.

South Africa and agroecology

The Department of Agriculture is now in the process of developing a Strategy for Agroecology for South Africa, with the aim of achieving “an ecologically, socially and economically sustainable agroecology sector that contributes towards poverty alleviation, job creation, food security, economic development, climate change mitigation and adaptation”. It is not clear where the drive for this Strategy emerges from, given South Africa’s non-support for the IAASTD findings. However, the proposed Strategy seems to posit agroecology as another production technology, an add-on to our current system, rather than a transformation, through policy, of our deeply entrenched industrial agricultural system, which is based on the privatization of agricultural resources and knowledge to

deploy an environmentally destructive production system, ever at the mercy of skewed global trade relations.

The introduction gives us hope that a visionary Strategy will follow when it points out that putting

“agro-ecological technologies into practice requires technological innovations, agriculture policy changes, socio-economic changes, but mostly a deeper understanding of the complex long-term interactions among resources, people and their environment. To attain this understanding agriculture must be conceived of as an ecological system as well as a human dominated socio-economic system. A new interdisciplinary framework to integrate the biophysical sciences, ecology and other social sciences is indispensable. Agroecology provides a framework by applying ecological theory to the management of agroecosystems according to specific resource and socio-economic realities, and by providing a methodology to make the required interdisciplinary connections”.

However the monitoring and evaluation plan set out in the Strategy exposes the fact that the political will for this transformation is utterly lacking. The indicators by which the Agroecology Strategy will be measured are:

- Increased numbers of black and white farmers employing agroecology,
- increased products from agroecology on the market,
- increased yield and
- increased organic matter content and microbial activities in the soil.

The Strategy which leads to these disappointing indicators is equally lacking in vision, political will or understanding of the task at hand. Nowhere in the strategy do we see a commitment to reshaping our policy environment to bring about genuine agrarian reform and dismantle the overwhelming dominance of foreign agribusiness in our food system. It is the recommendation of the African Centre for Biosafety that this Strategy be taken back to the drawing board to begin anew with a rigorous consultation with small scale-farmers, artisanal fishers, the landless, farmworkers, urban and rural poor, women and youth. The knowledge and experience of South Africa’s more than 1.2 million small-scale farmers and fisher folk must be canvassed and employed in the development of our agroecological policy.

Further, we do not believe that a Strategy can do the job, a policy with the force of the legislative system behind it is vital for the success of this important project. The policy or strategy should set out time-frames and targets to ensure the adoption of agro-ecology, for example, all new government initiatives with small-scale farmers must be based on agroecology from hereon, 15% of all agricultural activity to be based on agroecology by 2020, or a certain percentage of the budget to be set aside for the development of agroecology and increase incrementally annually. Clear strategies to ensure that this national strategy will interact effectively with provincial agricultural policies needs to be laid out. The complexity and multi-functionality of agroecology also calls for careful consultation and planning with an array of other departments, national and provincial, to integrate policy, objectives and planning.

Overview of agriculture in South Africa

According to the United Nations Food and Agricultural Organisation (UNFAO), over the course of the 20th century, 75% of the world’s plant genetic diversity was lost, as local varieties and land races have been replaced with genetically uniform seed. A similar process in animal husbandry has put

30% of all livestock breeds at risk of extinction. At the turn of the 21st century, 12 plant and five animal species generated three quarters of the world's food.^{viii} This is no accident, but the result of a very particular system of food production that demands uniformity and yield over diversity and nutrition and where vast monocultures can be grown, harvested, processed and then 'freely' traded over thousands of miles. It is a system that, by some estimates, contributes up to 57% of global greenhouse gas (GHG) emissions. It is also a system that, particularly in the USA and European Union, is propped up by a vast subsidy system^{ix}.

South Africa, by contrast with the rest of Africa, was a beneficiary of the Green Revolution and adopted the agricultural system described above. Proof of its commitment to industrial agriculture is the adoption of genetically modified (GM) crops more than a decade ago. South Africa remains the only country in Africa cultivating large scale GM crops.

Commercial agriculture was built on the base of exclusion of the majority, and a high level of concentration in ownership of land, water and other resources required for agriculture. In this context, the state provided ongoing support to the creation of a capital intensive farming sector. In 2007 the commercial seed market in South Africa was estimated to be valued at US\$300m, making it the joint 19th largest market in the world with Taiwan, Hungary, Netherlands and the Czech Republic^x.

Today, the South African agribusiness sector has become highly concentrated, involving only a few key players. For example, the market for grain storage and trading is dominated by Senwes, Afgri, and NWK all former regional agricultural co-operatives who privatized in the 1990s. These three companies now own approximately 74% of the country's grain storage capacity. The maize milling industry is equally concentrated; between them, Premier Foods, Tiger Milling, Pioneer Foods and Afgri control 75% of all maize milling capacity.^{xi}

The Competition Commission has been particularly concerned with the food and agro-processing sector, making it a priority in 2006. Since then it has investigated and applied sanctions to companies in the grain trading, processing and retail sectors. In November 2010, it fined Pioneer foods a record R800 million.^{xii}

With the recent approval of a merger between Du Pont/Pioneer Hi-bred and one of South Africa's last remaining local seed companies, Panaar, more than 50% of all South African seed cultivars will be owned by foreign multinationals, with Monsanto and Pioneer dominating.

While agribusiness has flourished, commercial farmers have keenly felt the huge transition of the sector, resulting from a programme of de-regulation that started back in the 1980s. Of the 60,000 commercial farming units operating in South Africa in 1996, less than 40,000 remain today.^{xiii} Those farmers that have remained found themselves operating largely without state support, and subject to the vagaries of the free market, resulting in a marked reduction in their terms of trade. For example, between June 2008 and June 2009, the average price received by local farmers rose by 6.2%, while the prices paid by farmers for inputs rose by an average of 23.2%.

Unfortunately, while South African commercial farmers exit the system in their droves, the South African government is channeling emerging farmers into this failing model, for example, through land reform programmes such as Land Redistribution for Agricultural Development (LRAD), which stipulate that redistributed land be used only for commercially viable production systems^{xiv}. In adopting agroecology, government must shift its mindset to "mimic nature rather than industry"^{xv}.

Food Sovereignty

The ACB is part of an African social movement that is working toward a just and environmentally sound agrarian system. Our work has been informed, and informs this movement. Food Sovereignty is a key underlying concept that has been developed by peasant movements in the South and keenly adopted and reshaped by Africans. It is worth noting the definition and principles of Food Sovereignty here, as they provide an excellent framework to shape the values that should underpin agroecology in South Africa.

Definition of food sovereignty (from the declaration of Nyéléni)

Food sovereignty is the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems. It puts the aspirations and needs of those who produce, distribute and consume food at the heart of food systems and policies rather than the demands of markets and corporations. It defends the interests and inclusion of the next generation. It offers a strategy to resist and dismantle the current corporate trade and food regime, and directions for food, farming, pastoral and fisheries systems determined by local producers and users. Food sovereignty prioritises local and national economies and markets and empowers peasant and family farmer-driven agriculture, artisanal - fishing, pastoralist-led grazing, and food production, distribution and consumption based on environmental, social and economic sustainability. Food sovereignty promotes transparent trade that guarantees just incomes to all peoples as well as the rights of consumers to control their food and nutrition. It ensures that the rights to use and manage lands, territories, waters, seeds, livestock and biodiversity are in the hands of those of us who produce food. Food sovereignty implies new social relations free of oppression and inequality between men and women, peoples, racial groups, social and economic classes and generations

Six principles of food sovereignty:

1. **Focuses on Food for People:** Food sovereignty puts the right to sufficient, healthy and culturally appropriate food for all individuals, peoples and communities, including those who are hungry, under occupation, in conflict zones and marginalised, at the centre of food, agriculture, livestock and fisheries policies; **and rejects** the proposition that food is just another commodity or component for international agri-business
2. **Values Food Providers:** Food sovereignty values and supports the contributions, and respects the rights, of women and men, peasants and small scale family farmers, pastoralists, artisanal fisherfolk, forest dwellers, indigenous peoples and agricultural and fisheries workers, including migrants, who cultivate, grow, harvest and process food; **and rejects** those policies, actions and programmes that undervalue them, threaten their livelihoods and eliminate them.
3. **Localises Food Systems:** Food sovereignty brings food providers and consumers closer together; puts providers and consumers at the centre of decision-making on food issues; protects food providers from the dumping of food and food aid in local markets; protects

consumers from poor quality and unhealthy food, inappropriate food aid and food tainted with genetically modified organisms; **and rejects** governance structures, agreements and practices that depend on and promote unsustainable and inequitable international trade and give power to remote and unaccountable corporations.

4. **Puts Control Locally:** Food sovereignty places control over territory, land, grazing, water, seeds, livestock and fish populations on local food providers and respects their rights. They can use and share them in socially and environmentally sustainable ways which conserve diversity; it recognizes that local territories often cross geopolitical borders and ensures the right of local communities to inhabit and use their territories; it promotes positive interaction between food providers in different regions and territories and from different sectors that helps resolve internal conflicts or conflicts with local and national authorities; **and rejects** the privatisation of natural resources through laws, commercial contracts and intellectual property rights regimes.
5. **Builds Knowledge and Skills:** Food sovereignty builds on the skills and local knowledge of food providers and their local organisations that conserve, develop and manage localised food production and harvesting systems, developing appropriate research systems to support this and passing on this wisdom to future generations; **and rejects** technologies that undermine, threaten or contaminate these, e.g. genetic engineering.
6. **Works with Nature:** Food sovereignty uses the contributions of nature in diverse, low external input agroecological production and harvesting methods that maximise the contribution of ecosystems and improve resilience and adaptation, especially in the face of climate change; it seeks to “heal the planet so that the planet may heal us”; **and rejects** methods that harm beneficial ecosystem functions, that depend on energy intensive monocultures and livestock factories, destructive fishing practices and other industrialised production methods, which damage the environment and contribute to global warming.

These six principles are interlinked and inseparable: in implementing the food sovereignty policy framework all should be applied.

Seed Sovereignty and Genetic Resources

Seed sovereignty sits at the heart of food sovereignty. Farmers have been improving seed through trial and error for thousands of years, but in recent decades these processes have been removed from the hands of farmers and placed in laboratories with limited or no direct farmer input. As corporations have poured resources into adapting seed, they have also reoriented the focus to yield maximisation with an eye on increasing farmer incomes in order to cover the costs of proprietary (privately-owned) seed technologies. This undermines food sovereignty as patented commercial seed based on a few underlying varieties pushes alternatives to the margins. The granting of intellectual property rights (IPRs) on seeds that farmers previously had free access to, forces farmers to buy seed from a narrow range of choices. The ability of farmers to make decisions based on the most appropriate seed for their agro-ecological context is diminished at the same time as resources are concentrated in the hands of corporations that have no knowledge of any specific context. The struggle for seed sovereignty goes hand in hand with the struggle for food sovereignty.

Farmers' Rights are those rights arising from the past, present and future contributions of farmers in conserving, improving and making available genetic resources, particularly those in the centres of origin/diversity. The concept of Farmers' Rights is recognised in the United Nation's Food and Agriculture (FAO) International Treaty on Plant Genetic Resources, ("The Seed Treaty"), which entered into force in 2004. The Seed Treaty's objectives include the conservation and sustainable use of plant genetic resources for food and agriculture. Its preamble affirms farmers' rights to save, use, exchange and sell farm-saved seed and other propagating material, and to participate in decision making.

The Agroecology Strategy must address farmers and small holder breeders' rights and ensure that these are not undermined. Currently international, regional and national law, as well as an array of bilateral arrangements, are closing down farmers rights and privileging private breeders at their expense. There is currently a push to harmonise regional seed laws based on the 1991 Act of the International Union for the Protection of Plant Varieties (UPOV). UPOV 1991 was developed by industrialised countries over 20 years ago to suit their own interests. At its core is the strengthening of breeders' rights and the undermining and prejudicing of farmers' rights. While South Africa has signed this UPOV 1991 version, it has not yet ratified it. In other words, the UPOV 1991 is not binding on South Africa and it is thus under no obligation to implement it. However, many of the restrictive elements of UPOV 1991 have already been implemented and threaten South African Farmers' Rights.

Alternatives to these must be developed, especially with resource-poor smallholders in mind. This includes farmers' privilege to allow resource poor farmers not only to save seed for use on their own farms, but also for distribution to others in their networks. This is currently against the law.

The dominant view that use of open pollinated varieties (OPVs) implies backward agriculture and the use of hybrids signifies the future must be challenged. Agroecology and OPV seeds go hand in hand, since OPVs can be saved on farms, have the potential for local adaptability and can be produced more cheaply than hybrids. Further down the line, on-farm plant breeding capacity will become important. But the experience of Cuba and elsewhere is that this will work best in a context of good farmer-peasant organisation, and will work poorly out of that context. Therefore, before an on-farm plant breeding system can be produced, seed saving networks need to be established. These can form the institutional basis for on-farm saved seed distribution and a plant breeding system.

The rights of small famers to save and exchange all seed and use and exchange propagating material (including seeds) between communities is in fact non-negotiable. Farmers' Rights are crucial for ensuring present and future food security in general, and in the fight against rural poverty in particular. Farmers' Rights are necessary prerequisites for the maintenance of crop genetic diversity, which is the basis of all food and agriculture production in the world. The protection and recognition of Farmers' Rights will allow farmers to maintain and develop crop genetic resources as they have done since the dawn of agriculture some ten thousand years ago.

In South Africa the formal seed system dominates the informal seed system in a way that is not the case for most of the rest of Africa. Two features of the formal seed system in South Africa stand out. The first is the dominance of the production process by a few multinational companies, in particular

Monsanto, Pannar and Pioneer Hi-Bred. The second is that substantial public sector capacity has been allowed to decay over the past 20 years as the private sector has taken over key aspects of governance of the seed system.

The corporate-industrial seed system has led, over time, to the decay of indigenous knowledge about seed and a greater reliance on the formal system than is the case in other African countries. It has also led to the neglect of important, but commercially marginal crops, being left out of variety improvement programmes. If agroecology is to flourish in South Africa, public institutions must be tasked with variety improvement, in tandem with farmers, to create appropriate crops for diverse food systems that do not rely on synthetic inputs. Agroecological systems rely on localised, hardy plants and livestock that include not just crops but green manures, animal fodder, medicines, wild vegetables, crops for shelter and energy to name a few.

A collaboration between government and farmers also needs to deal with common problems faced by small holder farmers, such as loss of viability during storage and train farmers to manage their seed and breeding systems optimally. We urge the department to consult the ACB's extensive work on seed regimes for more information. These documents are available here:

- ***South Africa's seed systems; challenges for food sovereignty.***
http://acbio.org.za/images/stories/dmdocuments/Seed_study-2012.pdf
- ***Harmonisation of Africa's seed laws. A recipe for disaster.***
<http://acbio.org.za/images/stories/dmdocuments/Harmonisation-of-seed-laws-in-Africa.pdf>

General Comments on the Strategy

The ACB is of the opinion that this Strategy needs to be rejected and developed through a highly consultative process with South African farmers and citizens with the aim of transforming our national agricultural system towards agroecology. We are also of the opinion that we need an agroecology policy, rather than strategy, to ensure that real changes are effected. Notwithstanding, we offer the following comments on the proposed strategy as a contribution to the shaping of this extremely important issue.

3.2 Agroecology practices

The Strategy sets out a number of agroecological production systems. These do not need to be named in the Strategy - there are as many forms of agroecology as there are farmers practising it. What is important is to define the characteristics of a new food production system that will bring about a socially just, environmentally sound and nutritious food production system that must become the benchmark for agroecological practice. The principles of Food Sovereignty explained above would constitute a useful framework for these benchmarks and should be further envisioned in collaboration with South African small scale farmers, fisher folk, landless peoples, farmworkers and South African citizens.

It is debatable whether organics or conservation farming systems should be considered as inherently agroecological systems. For example, organic agriculture can be an intensive, export led operation employing bad labour practices – a copy of the industrial model, the only difference being that organic inputs replace synthetic ones. Conservation farming, in recent years has been hijacked

by Monsanto, which promotes the use of RoundUp and monocultures, the “agroecological” part being the promotion of no-tillage practises. These examples illustrate why these should be removed from the strategy and replaced by agroecological principles or benchmarks.

3.3 Benefits/impacts of agroecology

This section focuses solely on environmental benefits of agroecology. The social and economic benefits must also be included, such as vitalising local economies, empowering women and dismantling the corporate stranglehold that the IAASTD has identified as a key cause of hunger and poverty. The impact on human health is also significant once agrochemicals are removed from the system and local natural foods can begin to eliminate diseases related to the “modern diet”, such as obesity and diabetes.

3.3.1 Climate change mitigation: In this section the current export-oriented agricultural system needs to be revised to provide primarily for local markets. The transport of food all over the world is a major source of GHG emissions.

3.3.4 Resilient ecosystems: resilience provides more than only environmental benefits, it mitigates against risks for food security by providing a failsafe system should one crop fail. Resilience improves the overall health and vitality of the food production systems in which we are embedded and therefore improves our health and well-being. The creation of resilient systems also implies greater social cohesion as farmers work together to improve production systems and have a closer relationship with consumers.

3.3.5 Genetic resources: industrial agriculture and privatisation of plant and animal breeding has dangerously narrowed our agrobiodiversity, including wild relatives, medicinal and wild crops, even fibre and crops used for shelter have been eroded. Current policy further encourages this trend and needs to be dismantled. We have dealt with this in more detail in the section on seed sovereignty.

3.3.6 Soil and nutrient management: one of the key agricultural development practises for Africa has been the provision of subsidised synthetic fertilisers. More creative methods to subsidise farmers and the greater workforce needed for these labour intensive systems need to be envisioned with the collaboration with farmers. In Malawi, an exit strategy from fertilizer subsidy schemes has been to link fertilizer subsidies directly to agroforestry investments on the farm in order to provide for long-term sustainability in nutrient supply, and to build up soil health as the basis for sustained yields and improved efficiency of fertilizer response. This has been called the “subsidy to sustainability” approach^{xvi}.

4. Problem Statement

The problem statement section is lacking a critique of government policy and this is crucial. Who has been empowered and disempowered by current policy? Why are people living on marginal and un-serviced land or in informal settlements and struggling with food security? A great opportunity to reflect on the plight of the hungry and landless in South Africa and to revision policy to bring about transformation has been missed.

4.1 Low levels of awareness: public research, education and extension institutions have been hijacked by agribusiness in service of their bottom line and government has legitimised this. Knowledge creation needs to be taken back by public institutions for public good.

Illiteracy, mentioned here, need not be a constraining factor. The old model of vertical imposition of agricultural technology from experts will not be effective in the promotion of agro-ecology. Horizontal transfer, peer learning between farmers and collaboration with local support institutions will be vital.

4.3. High competition for land and water: this is a deeply political issue and speaks to the dire failure of the land redistribution programme and damaging macroeconomic policies that have favoured corporate investment over rural development. It is beyond the scope of this submission to elaborate further on these crucial and complex issues but no Strategy can be accepted without a thorough and proactive analysis and plan on these issues.

4.5 Soil degradation: the strategy states that “extreme poverty and hunger push people onto marginal lands and more fragile ecosystems characterized by drought stress and low soil fertility. Yield growth has slowed down and environmental stress has increased”. Here is another astoundingly apolitical statement.

The apartheid regime pushed people onto marginalised and un-serviced land and this has not been rectified by the current government. The small percentage of land distribution that has taken place has pushed people into inappropriate agricultural or land use models that has caused further land degradation in many cases.

5. Interventions

Awareness raising: awareness raising amongst consumers about agroecology is useless if the enabling environment and support systems to foster agroecology are not put in place. In addition, consumers must be able to access this produce at reliable and convenient outlets. The strategy needs to look at the concentration of power in the food sector and ensure that small producers can enter the market. Currently, the power of a handful of retailers pushes out family spazas, local grocers and small sellers. These retailers can offer large volumes of produce at low prices and set quality standards that small scale farmers cannot meet. Rather than demonstration centres build up successful agroecology projects built in collaboration with farmers governments and local research institutions with innovative outlets.

5.5 Research and technology development: this is currently driven by monetary incentives, such as intellectual property rights and the focus on commercially viable products at an economy of scale. Agroecology is not primarily profit driven, unlike our current system. For this reason public funds will need to replace massive corporate investment in agriculture. Appropriate resources, technologies and equipment needs to be developed from public funds. This is also an opportunity to develop a new economic sector and job creation opportunities.

Where do large scale farmers fit in here? How will they be supported to transform their practises in an economically sustainable manner?

5.6 Market development: markets for agroecology should focus on shortening the chain from producer to consumer and standards and certification must take into account the circumstances of resource poor producers. Local food security must be the first priority with a decreasing reliance on export markets.

6. Monitoring and evaluation

The monitoring and evaluation plan does not correspond to the objectives of creating a socially just, environmentally sound food production system that contribute to broader economic development. Indicators must reflect the progress that is being made in developing an enabling policy and physical environment to foster a transition to agroecology. The six principles of Food Sovereignty, described above, could be a useful framework from which to draw more appropriate and meaningful indicators. In addition, scientific indicators to measure the impact of agroecology on the environment and reduction of GHG emissions are important.

Conclusion

Agroecology is not a new sector to add onto our current food production system to cater particularly for small-holder farmers; it is the direction that our entire agricultural sector needs to orientate to if we are to deal with the urgent crises' of climate change, social inequity and hunger. This Strategy is wholly inadequate for the task at hand, principally because it lacks any political analysis of why hunger and inequality persists in South Africa and why environmentally unsound practices continue to be supported by Government policy. Without transformation of these policies, a new and equitable food production system cannot be brought about.

It is the recommendation of the ACB that the Department go back to the drawing board and that a process of thorough consultation be undertaken to co-create a policy to provide an enabling environment for the adoption of agroecology in the long-term. This policy must encompass environmental, social and economic issues that are related to food production. We challenge the Department to devise "a new interdisciplinary framework to integrate the biophysical sciences, ecology and other social sciences", as mentioned in the Strategy introduction. This has to be done in dialogue with the citizenry and farmers of South Africa.

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