

NUESTRA TIERRA **OUR LAND** **NOS TERRES**
NUESTRO BUSINESS **OUR BUSINESS** **NOTRE BUSINESS**

January 18, 2017

RE: Calling on the USAID, DFID, DANIDA, The Netherlands, and the Bill and Melinda Gates Foundation to stop financing the World Bank-managed Enabling the Business of Agriculture (EBA) project.

Dear Mr. Gates, Ms. Smith, Mr. Jensen, Ms. Patel and Ms. Ploumen,

We are writing today to urge you to stop financing the Enabling the Business of Agriculture (EBA) project, which jeopardizes farmers' right to seeds, food security, and the future of our planet.

In 2012, the World Bank was tasked by the G8 to create a "Doing Business in Agriculture Index."¹ With your support, the Bank launched the EBA project, which will benchmark the agricultural policies of over 60 countries in 2017.

The EBA's top-down approach dictates the so-called "good practices" to regulate agriculture and scores countries on how well they apply and implement its prescriptions. Based on the EBA scores, the World Bank leverages policy changes in agriculture.² This is a dangerously misguided effort, as national policymaking should prioritize locally adapted solutions based on the experiences and demands of farmers, pastoralists, fisherfolks, and rural communities.

Among several categories of indicators (Finance, Transport, Fertilizer, etc.), the EBA includes a sub-indicator which evaluates seed regulations.

In developing countries, farmers source **80 to 90 percent of their seeds within farmer-managed seed systems**. These systems are maintained by farmers' own work to recycle and save seeds from their crops, and by farmer-to-farmer gifts, exchanges, and trade. Farmer-managed seed systems provide a rich diversity of seed, including varieties that are affordable and adapted to local environmental conditions. They are vital to support agro-biodiversity, food security, and resilience against climate and economic shocks.

Yet the EBA's narrow set of "good practices" to regulate seeds systems restricts policymaking to facilitating private development and marketing of industrial seeds. The EBA uses misleading language by calling industrial seeds "quality seeds"³ and conveys the perception that farmers' seeds are unworthy of policy support. The project pushes governments to adopt intellectual property rights framework, which curtails farmers' rights to save, exchange, and sell seeds. It advocates for reforms to accelerate and minimize the costs of releasing industrial seeds; and places corporations at the center of every aspect of seed systems.

While the EBA reforms will not benefit the majority of farmers, they will increase the profits of a handful of private companies. Only six multinationals currently control over two-thirds of the industrial seed market, and pending agroindustry mergers stand to further consolidate this oligopoly.⁴ The concentration of the global seed market has a significant impact on seed prices⁵ as well as seed diversity. Replacing farmers' seeds with a few uniform industrial varieties contributes to the rapid erosion of global agro-biodiversity, which is crucial to address the climate crisis.

In order to protect farmers, food security, and our planet, we urge you to stop financing the EBA project. We call on you to rather fight poverty and food insecurity by promoting vibrant local seed systems, and supporting true participation of farmers in the design of regulations and policies in the agricultural sector.

We appreciate you addressing this critical issue and look forward to hearing from you at your earliest convenience.

Sincerely,

1. Abibiman Foundation	Ghana
2. Acción Ecológica	Ecuador
3. Action Ceinture Verte pour l'environnement (ACVE)	Burundi
4. Action for Solidarity Environment Equality and Diversity (ASEED)	Netherlands
5. African Center for Biodiversity	South Africa
6. Agrarian Trust	USA
7. Alianza Hondureña frente al Cambio Climático (AHCC)	Honduras
8. Alliance for Sustainable and Holistic Agriculture (ASHA)	India
9. Amis de l'Afrique Francophone (AMAF - Benin)	Benin
10. Anywaa Survival Organisation	UK/Ethiopia
11. Asia Pacific Forum on Women Law and Development (APWLD)	Asia
12. Asociación Nacional de Fomento a la Agricultura Ecológica (ANAFAE)	Honduras
13. Asociación Red de Coordinación en Biodiversidad	Costa Rica
14. Association des Jeunes Agriculteurs de Casamance (AJAC LUKAAL)	Senegal
15. Association des Organisations Professionnelles Paysannes de Kayes (AOPP)	Mali
16. Association for Plant Breeding for the Benefit of Society (APBEBES)	International
17. Association pour la Défense des Droits de l'Eau et de l'Assainissement (ADDEA)	Senegal
18. Association Recherche Action pour la Nature (ARAN)	Togo
19. Banana Link	UK
20. Bangladesh Fish Workers Alliance	Bangladesh
21. Biofuelwatch	USA/UK
22. Bioscience Resource Project	USA
23. Biowatch South Africa	South Africa
24. Both ENDS	Netherlands
25. Bread for All	Switzerland
26. Bretton Woods Project	UK
27. Broadley Garden Centre	UK
28. Broederlijk Delen	Belgium
29. Cadre de Concertation des Producteurs d'Arachide (CCPA)	Senegal
30. CARITAS Kaolack	Senegal
31. CCFD-Terre Solidaire	France
32. Center for Sustainable Development (CENESTA)	Iran
33. Centre de Recherche sur l'Environnement, la Démocratie et les Droits de l'Homme	DRC
34. Centro de Iniciativas en Políticas Ambientales	Nicaragua
35. Centro de los Derechos del Campesino	Nicaragua
36. CEPA-SL	Sierra Leone
37. Cercle pour la Défense de l'Environnement (CEDEN)	RDC
38. Citizen Consumer and Civic Action Group (CAG)	India
39. CNCD-11.11.11	Belgium

40. Coalición Nacional de Redes y Organizaciones Ambientales (CONROA)	Honduras
41. Coalition pour la Protection du Patrimoine Génétique Africain (COPAGEN)	Senegal
42. Collectif Citoyen pour l'Agro-Ecologie (CCAÉ)	Burkina Faso
43. Community Alliance for Global Justice/AGRA Watch	USA
44. Construisons Ensemble le Monde (CEM)	DRC
45. Coordinador Civil de Masaya	Nicaragua
46. Coordinadora Civil	Nicaragua
47. Earthlife Africa	South Africa
48. EarthLore Foundation	South Africa
49. Eastern Africa Smallholder Farmers Association (EASFA)	East Africa
50. EcoNexus	UK
51. Education For Better Living Organization (EBLI)	Tanzania
52. Enda Pronat	Senegal
53. Environmental Justice Initiative for Haiti	USA
54. ETC Group	Canada
55. Fahamu Africa	Senegal
56. Farmworker Association of Florida	USA
57. Fastenopfer (Swiss Catholic Lenten Fund)	Switzerland
58. Fondama	Haiti
59. Food Sovereignty Ghana	Ghana
60. Foro Ambiental Santiagueño	Argentina
61. Foundation Karibu	Tanzania
62. Friends of the Siberian Forests	Russia
63. Gaia Foundation	UK
64. Gender Action	International
65. Global Justice	UK
66. GMB	UK
67. GRAIN	International
68. Greenhorns	USA
69. Groundswell International	International
70. HATOF Foundation	Ghana
71. ICCA Consortium	International
72. Indigenous Peoples Forum	India
73. Indigenous Perspectives	India
74. Initiatives d'Echanges pour un Développement Durable (IEDD)	Burkina Faso
75. CICODEV Afrique	Senegal
76. Institute for Agriculture and Trade Policy (IATP)	USA
77. International Accountability Project	International
78. Inyanda Land Rights Movement	South Africa
79. Iowa CCI	USA
80. JINUKUN	Benin
81. JM&Co	UK
82. Kalpavriksh	India
83. Kasisi Agricultural Training Centre	Zambia
84. La Route du Sel et de l'Espoir	France
85. Labour, Health and Human Rights Development Centre (LHAHRDEV)	Nigeria
86. Land Workers' Alliance	UK
87. Local Futures	International

88. Mangrove Action Project	International
89. Maryknoll Office for Global Concerns	USA
90. Movement Rights	USA
91. Namati	USA
92. National Family Farm Coalition	USA
93. Nesara Farmers' Market	India
94. Network for Vital Agriculture and Nutrition	Netherlands
95. Nicaragua Center for Community Action (NICCA)	USA
96. Nothing But Tea	UK
97. NOUS SOMMES LA SOLUTION	West Africa
98. Nyambya Tea Co	Uganda
99. Oakland Institute	USA
100. Open Food Network	International
101. OT Watch	Mongolia
102. Other Worlds	USA
103. Pacific Network on Globalisation (PANG)	Fiji
104. Partners for the Land & Agricultural Needs of Traditional Peoples (PLANT)	USA
105. People's Dialogue	Swaziland
106. Platform Aarde Boer Consument	Netherlands
107. Popular Resistance	USA
108. Prosalus	Spain
109. Puvudham Rural Development Trust	India
110. Quinoa	Belgium
111. Rashtriya Raithu Seva Samithi	India
112. Red de Organizaciones Sociales de Managua	Nicaragua
113. Red por una América Latina Libre de Transgénicos (RALLT)	Latin America
114. Réseau de Lutte contre la Faim (RELUFA)	Cameroon
115. Ritongo Africa	Kenya
116. Rivers without Boundaries	Mongolia
117. Rythu Swarajya Vedika	India
118. SAUTI YA WANAWAKE	Tanzania
119. Seed Savers Network	Kenya
120. Sierra Leone Network on the Right to Food (SiLNoRF)	Sierra Leone
121. Social Justice Connection	Canada
122. Society for International Development (SID)	International
123. SOS Faim	Belgium
124. Southern African Rural Women's Assembly	South Africa
125. SWISSAID	Switzerland
126. Tamilnadu Organic Farmers Federation	India
127. Teacraft	UK
128. Thanal	India
129. The Corner House	UK
130. The Land magazine	UK
131. The Rules	International
132. Third World Network	International
133. Timberwatch Coalition	South Africa
134. Traidcraft	UK
135. Tropical Agriculture Association	UK

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| 136. Trust for Community Outreach and Education (TCOE) | South Africa |
| 137. Union Paysanne | Canada |
| 138. United Nations Association, UK Branch (UNA-UK) | UK |
| 139. United Small and Medium scale Farmers' Associations of Nigeria (USMEFAN) | Nigeria |
| 140. Urgewald | Germany |
| 141. Walking on the South (WotS) | Italy |
| 142. Women's International League for Peace and Freedom (WILPF) | Netherlands |
| 143. World Family | UK |
| 144. Zambia Alliance for Agroecology and Biodiversity Conservation (ZAABC) | Zambia |
| 145. Zestful Development Services (ZDES) | Benin |
146. Dr. Norman Uphoff – Professor Emeritus of Government and International Agriculture and Core Faculty Member, Cornell Institute for Public Affair, Cornell University, USA
147. Dr. Michel Pimbert – Professor and Executive Director of the Centre for Agroecology, Water and Resilience, Coventry University, UK
148. Dr. David J. Midmore – Emeritus Professor, Central Queensland University, Australia
149. Dr. Peter Dart – Honorary Associate Professor, School of Agriculture and Food Science, University of Queensland, Australia
150. Dr. Amir Kassam – OBE, FRSB, Visiting Professor, School of Agriculture, Policy and Development, University of Reading, UK
151. Dr. Peter Greaves – Former Senior Adviser at UNICEF's Programme Division (micronutrients) and Former Secretary of the British Nutrition Foundation, UK
152. Dr. Michael Spann – School of Political Science and International Studies, University of Queensland, Australia
153. Dr. Molly D. Anderson – William R. Kenan Jr. Professor of Food Studies, Middlebury College, USA
154. Dr. Tushar Chakraborty – Head, Gene Regulation Laboratory, Indian Institute of Chemical Biology, India
155. Dr. Willem A. Stoop – Agronomist, Former Researcher at CIMMYT, ICRISAT, ISNAR and WARDA and Royal Tropical Institute in Amsterdam, The Netherlands
156. Dr. Anne Woodfine – Tropical Natural Resources and Sustainable Land Management Specialist
157. Devon Jenkins – Program Specialist, International Programs, College of Agriculture and Life Sciences, Cornell University, USA

Sent via email:

Bill Gates, Co-Chair of the Bill & Melinda Gates Foundation
 Gayle Smith, Administrator of the United States Agency for International Development
 Kristian Jensen, Minister for Foreign Affairs, Denmark
 Priti Patel, Secretary of State for International Development, United Kingdom
 Lilianne Ploumen, Minister for Foreign Trade and Development Cooperation, The Netherlands

Cc.

Jim Yong Kim, President of the World Bank Group
 Federica Saliola, Program Manager in the WBG Development Economics Vice-Presidency

¹ The White House. "Fact Sheet: G-8 action on Food Security and Nutrition." *Office of the Press Secretary*, May 18, 2012. <https://www.whitehouse.gov/the-press-office/2012/05/18/fact-sheet-g-8-action-food-security-and-nutrition>

² World Bank staff recently indicated that both Vietnam and Rwanda had used the EBA to design new seed ordinances. Multiple EBA project and donor documents clearly state a goal to influence policymaking around the world, especially in developing countries. See: USAID, Feed the Future. "Your Questions Answered about Enabling the Business of Agriculture!" *Agrilinks*. <https://agrilinks.org/blog/your-questions-answered-about-enabling-business-agriculture>; DFID, Development Tracker. "Support to the World Bank Project 'Benchmarking the Business of Agriculture.' (documents)." *Developing Countries, Unspecified*. <https://devtracker.dfid.gov.uk/projects/GB-1-204123/documents>.

³ Research has shown that widely used arguments to discredit farmers' seeds as potentially unsafe and prone to diseases are unfounded. Studies find no significant differences between quality of farmer seeds and industrial seeds (in terms of health, absence of contaminants, etc.), and no evidence exists that seed recycling (saving the seeds for sowing at the next crop season) lowers quality. See: Coomes, Oliver T. et al. "Farmer seed networks make a limited contribution to agriculture? Four common misconceptions." *Food Policy* 56 (2015): 41-50.

⁴ ETC Group. "The Monsanto–Bayer tie-up is just one of seven; Mega-Mergers and Big Data Domination Threaten Seeds, Food Security." September 15, 2016. <http://www.etcgroup.org/content/monsanto-bayer-tie-just-one-seven-mega-mergers-and-big-data-domination-threaten-seeds-food>

⁵ Fuglie, K., Heisey, P., King, J., and D. Schimmelpfennig. *Rising Concentration in Agricultural Input Industries Influences New Farm Technologies*. USDA Economic Research Service, December 2012. <http://www.ers.usda.gov/amber-waves/2012-december/rising-concentration-in-agricultural-input-industries-influences-new-technologies.aspx#.V9B97z4rJcw>