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Via email: jyk@worldbank.org

Cc.

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January XX, 2016

RE: Calling on the World Bank to end the Enabling the Business of Agriculture (EBA)

Dear Dr. Jim Yong Kim,

We are writing today to urge you to put an end to 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 the support of the US, UK, Danish, and Dutch governments as well as the Bill and Melinda Gates Foundation, 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 yosecurtails 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 put an immediate end to the EBA project. We call on the World Bank 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,

[SIGNATORIES]

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#.V9B97z4r\[cw](http://www.ers.usda.gov/amber-waves/2012-december/rising-concentration-in-agricultural-input-industries-influences-new-technologies.aspx#.V9B97z4r[cw)