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.” 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. 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” 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. The concentration of the global seed market has a significant impact on seed prices 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  
   Abibiman Foundation  
   Ghana
2. Acción Ecológica  
   Acción Ecológica  
   Ecuador
3. Action Ceinture Verte pour l’environnement (ACVE)  
   Action Ceinture Verte pour l’environnement (ACVE)  
   Burundi
4. Action for Solidarity Environment Equality and Diversity (ASEED)  
   Action for Solidarity Environment Equality and Diversity (ASEED)  
   Netherlands
5. African Center for Biodiversity  
   African Center for Biodiversity  
   South Africa
6. Agrarian Trust  
   Agrarian Trust  
   USA
7. Alianza Hondureña frente al Cambio Climático (AHCC)  
   Alianza Hondureña frente al Cambio Climático (AHCC)  
   Honduras
8. Alliance for Sustainable and Holistic Agriculture (ASHA)  
   Alliance for Sustainable and Holistic Agriculture (ASHA)  
   India
9. Amis de l’Afrique Francophone (AMAF - Benin)  
   Amis de l’Afrique Francophone (AMAF - Benin)  
   Benin
10. Anywaa Survival Organisation  
    Anywaa Survival Organisation  
    UK/Ethiopia
11. Asia Pacific Forum on Women Law and Development (APWLD)  
    Asia Pacific Forum on Women Law and Development (APWLD)  
    Asia
12. Asociación Nacional de Fomento a la Agricultura Ecológica (ANAFAE)  
    Asociación Nacional de Fomento a la Agricultura Ecológica (ANAFAE)  
    Honduras
13. Asociacion Red de Coordinación en Biodiversidad  
    Asociacion Red de Coordinación en Biodiversidad  
    Costa Rica
14. Association des Jeunes Agriculteurs de Casamance (AJAC LUKAAL)  
    Association des Jeunes Agriculteurs de Casamance (AJAC LUKAAL)  
    Senegal
15. Association des Organisations Professionnelles Paysannes de Kayes (AOPP)  
    Association des Organisations Professionnelles Paysannes de Kayes (AOPP)  
    Mali
16. Association for Plant Breeding for the Benefit of Society (APBREBES)  
    Association for Plant Breeding for the Benefit of Society (APBREBES)  
    International
17. Association pour la Défense des Droits de l’Eau et de l’Assainissement (ADDEA)  
    Association pour la Défense des Droits de l’Eau et de l’Assainissement (ADDEA)  
    Senegal
18. Association Recherche Action pour la Nature (ARAN)  
    Association Recherche Action pour la Nature (ARAN)  
    Togo
19. Banana Link  
    Banana Link  
    UK
20. Bangladesh Fish Workers Alliance  
    Bangladesh Fish Workers Alliance  
    Bangladesh
21. Biofuelwatch  
    Biofuelwatch  
    USA/UK
22. Bioscience Resource Project  
    Bioscience Resource Project  
    USA
23. Biowatch South Africa  
    Biowatch South Africa  
    South Africa
24. Both ENDS  
    Both ENDS  
    Netherlands
25. Bread for All  
    Bread for All  
    Switzerland
26. Bretton Woods Project  
    Bretton Woods Project  
    UK
27. Broadley Garden Centre  
    Broadley Garden Centre  
    UK
28. Broederlijk Delen  
    Broederlijk Delen  
    Belgium
29. Cadre de Concertation des Producteurs d’Arachide (CCPA)  
    Cadre de Concertation des Producteurs d’Arachide (CCPA)  
    Senegal
30. CARITAS Kaolack  
    CARITAS Kaolack  
    Senegal
31. CCFD-Terre Solidaire  
    CCFD-Terre Solidaire  
    France
32. Center for Sustainable Development (CENESTA)  
    Center for Sustainable Development (CENESTA)  
    Iran
33. Centre de Recherche sur l’Environnement, la Démocratie et les Droits de l’Homme  
    Centre de Recherche sur l’Environnement, la Démocratie et les Droits de l’Homme  
    DRC
34. Centro de Initiativas en Políticas Ambientales  
    Centro de Initiativas en Políticas Ambientales  
    Nicaragua
35. Centro de los Derechos del Campesino  
    Centro de los Derechos del Campesino  
    Nicaragua
36. CEPA-SL  
    CEPA-SL  
    Sierra Leone
37. Cercle pour la Défense de l’Environnement (CEDEN)  
    Cercle pour la Défense de l’Environnement (CEDEN)  
    RDC
38. Citizen Consumer and Civic Action Group (CAG)  
    Citizen Consumer and Civic Action Group (CAG)  
    India
39. CNCD-11.11.11  
    CNCD-11.11.11  
    Belgium
<table>
<thead>
<tr>
<th></th>
<th>Name</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>40.</td>
<td>Coalición Nacional de Redes y Organizaciones Ambientales (CONROA)</td>
<td>Honduras</td>
</tr>
<tr>
<td>41.</td>
<td>Coalition pour la Protection du Patrimoine Génétique Africain (COPAGEN)</td>
<td>Senegal</td>
</tr>
<tr>
<td>42.</td>
<td>Collectif Citoyen pour l'Agro-Ecologie (CCAE)</td>
<td>Burkina Faso</td>
</tr>
<tr>
<td>43.</td>
<td>Community Alliance for Global Justice/AGRA Watch</td>
<td>USA</td>
</tr>
<tr>
<td>44.</td>
<td>Construimos Ensemble le Monde (CEM)</td>
<td>DRC</td>
</tr>
<tr>
<td>45.</td>
<td>Coordinador Civil de Masaya</td>
<td>Nicaragua</td>
</tr>
<tr>
<td>46.</td>
<td>Coordinadora Civil</td>
<td>Nicaragua</td>
</tr>
<tr>
<td>47.</td>
<td>Earthlife Africa</td>
<td>South Africa</td>
</tr>
<tr>
<td>48.</td>
<td>EarthLore Foundation</td>
<td>South Africa</td>
</tr>
<tr>
<td>49.</td>
<td>Eastern Africa Smallholder Farmers Association (EASFA)</td>
<td>East Africa</td>
</tr>
<tr>
<td>50.</td>
<td>EcoNexus</td>
<td>UK</td>
</tr>
<tr>
<td>51.</td>
<td>Education For Better Living Organization (EBLI)</td>
<td>Tanzania</td>
</tr>
<tr>
<td>52.</td>
<td>Enda Pronat</td>
<td>Senegal</td>
</tr>
<tr>
<td>53.</td>
<td>Environmental Justice Initiative for Haiti</td>
<td>USA</td>
</tr>
<tr>
<td>54.</td>
<td>ETC Group</td>
<td>Canada</td>
</tr>
<tr>
<td>55.</td>
<td>Fahamu Africa</td>
<td>Senegal</td>
</tr>
<tr>
<td>56.</td>
<td>Farmworker Association of Florida</td>
<td>USA</td>
</tr>
<tr>
<td>57.</td>
<td>Fastenopfer (Swiss Catholic Lenten Fund)</td>
<td>Switzerland</td>
</tr>
<tr>
<td>58.</td>
<td>Fondama</td>
<td>Haiti</td>
</tr>
<tr>
<td>59.</td>
<td>Food Sovereignty Ghana</td>
<td>Ghana</td>
</tr>
<tr>
<td>60.</td>
<td>Foro Ambiental Santiqueño</td>
<td>Argentina</td>
</tr>
<tr>
<td>61.</td>
<td>Foundation Karibu</td>
<td>Tanzania</td>
</tr>
<tr>
<td>62.</td>
<td>Friends of the Siberian Forests</td>
<td>Russia</td>
</tr>
<tr>
<td>63.</td>
<td>Gaia Foundation</td>
<td>Tanzania</td>
</tr>
<tr>
<td>64.</td>
<td>Gender Action</td>
<td>International</td>
</tr>
<tr>
<td>65.</td>
<td>Global Justice</td>
<td>UK</td>
</tr>
<tr>
<td>66.</td>
<td>GMB</td>
<td>UK</td>
</tr>
<tr>
<td>67.</td>
<td>GRAIN</td>
<td>International</td>
</tr>
<tr>
<td>68.</td>
<td>Greenhorns</td>
<td>USA</td>
</tr>
<tr>
<td>69.</td>
<td>Groundswell International</td>
<td>International</td>
</tr>
<tr>
<td>70.</td>
<td>HATOF Foundation</td>
<td>Ghana</td>
</tr>
<tr>
<td>71.</td>
<td>ICCA Consortium</td>
<td>International</td>
</tr>
<tr>
<td>72.</td>
<td>Indigenous Peoples Forum</td>
<td>India</td>
</tr>
<tr>
<td>73.</td>
<td>Indigenous Perspectives</td>
<td>India</td>
</tr>
<tr>
<td>74.</td>
<td>Initiatives d’Echanges pour un Développement Durable (IEDD)</td>
<td>Burkina Faso</td>
</tr>
<tr>
<td>75.</td>
<td>CICODEV Afrique</td>
<td>Senegal</td>
</tr>
<tr>
<td>76.</td>
<td>Institute for Agriculture and Trade Policy (IATP)</td>
<td>USA</td>
</tr>
<tr>
<td>77.</td>
<td>International Accountability Project</td>
<td>International</td>
</tr>
<tr>
<td>78.</td>
<td>Inyanda Land Rights Movement</td>
<td>South Africa</td>
</tr>
<tr>
<td>79.</td>
<td>Iowa CCI</td>
<td>USA</td>
</tr>
<tr>
<td>80.</td>
<td>JINUKUN</td>
<td>Benin</td>
</tr>
<tr>
<td>81.</td>
<td>JM&amp;Co</td>
<td>UK</td>
</tr>
<tr>
<td>82.</td>
<td>Kalpavriksh</td>
<td>India</td>
</tr>
<tr>
<td>83.</td>
<td>Kasisi Agricultural Training Centre</td>
<td>Zambia</td>
</tr>
<tr>
<td>84.</td>
<td>La Route du Sel et de l’Espoir</td>
<td>France</td>
</tr>
<tr>
<td>85.</td>
<td>Labour, Health and Human Rights Development Centre (LHAHRDEV)</td>
<td>Nigeria</td>
</tr>
<tr>
<td>86.</td>
<td>Land Workers’ Alliance</td>
<td>UK</td>
</tr>
<tr>
<td>87.</td>
<td>Local Futures</td>
<td>International</td>
</tr>
</tbody>
</table>
88. Mangrove Action Project
89. Maryknoll Office for Global Concerns
90. Movement Rights
91. Namati
92. National Family Farm Coalition
93. Nesara Farmers’ Market
94. Network for Vital Agriculture and Nutrition
95. Nicaragua Center for Community Action (NICCA)
96. Nothing But Tea
97. NOUS SOMMES LA SOLUTION
98. Nyambya Tea Co
99. Oakland Institute
100. Open Food Network
101. OT Watch
102. Other Worlds
103. Pacific Network on Globalisation (PANG)
104. Partners for the Land & Agricultural Needs of Traditional Peoples (PLANT)
105. People’s Dialogue
106. Platform Aarde Boer Consument
107. Popular Resistance
108. Prosalus
109. Puvidham Rural Development Trust
110. Quinoa
111. Rashtriya Raithu Seva Samithi
112. Red de Organizaciones Sociales de Managua
113. Red por una América Latina Libre de Transgénicos (RALLT)
114. Réseau de Lutte contre la Faim (RELUFA)
115. Ritongo Africa
116. Rivers without Boundaries
117. Rythu Swarajya Vedika
118. SAUTI YA WANAWAKE
119. Seed Savers Network
120. Sierra Leone Network on the Right to Food (SiLNoRF)
121. Social Justice Connection
122. Society for International Development (SID)
123. SOS Faim
124. Southern African Rural Women’s Assembly
125. SWISSAID
126. Tamilnadu Organic Farmers Federation
127. Teacraft
128. Thanal
129. The Corner House
130. The Land magazine
131. The Rules
132. Third World Network
133. Timberwatch Coalition
134. Traidcraft
135. Tropical Agriculture Association
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


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.
