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Building bridges in policy implementation during a pandemic: insights from an e-survey on Indian Producer Organisations

C. Shambu Prasad , Abhishek Saxena , and Deborah Dutta 

ABSTRACT

Despite the widely acknowledged importance of consultative policymaking, interventions to encourage stakeholder participation remain scarce. The presence of exigencies, such as the pandemic, can further normalise the lack of participative processes unless serious alternatives are presented. This paper presents the results of an exercise, during the pandemic, on Farmer Producer Organisations (FPOs) through an e-survey of stakeholders whose views, if considered, could have avoided some of the implementation gaps and challenges before the rollout. The survey process demonstrates how facilitated and well-designed consultations can enable a better buy-in in policy implementation and importantly help build state capacity through such processes, despite the pandemic. The paper also highlights the need for scholars and citizens to pay greater attention to the everydayness of policy implementation beyond presenting critiques of policy formulation.

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Farmer producer organisations (FPOs); consultative policy design; e-survey; stakeholder engagement; state capacity

1. Rethinking policy consultations during the pandemic: a review

Policy documents are often signalling devices for political priorities and institutional reforms. There is a tendency within policy studies to over analyse policy intent and design in public policies while underestimating the nitty gritty of policy implementation where such priorities and reforms are embedded and operationalised. Going beyond tracking performance delivery, effective implementation necessitates close liaison with, and an understanding of, the position of the implementing agencies (Hudson, Hunter, and Peckham 2019). Public policy literature points to the importance of public consultations both for effective policy design and the larger goal of deliberative democracy. The complexity of policies necessitates a shift from a unicentral, analytic, scientific approach to a more multicentral, interactive stakeholders approach (Geurts and Joldersma 2001). Citizen participation has been seen as critical to the democratisation of policy expertise and policy science needs to embrace participatory methodologies more openly (Fischer 1993). Within development studies, the twenty-first century provides an opportunity for participatory researchers to get over the inward looking “lost years” of the 1990s and re-recognise the political and cultural embeddedness of policy (Biggs 2008). Approaches that allow for collaborations, methodological pluralism, adaptive iteration, and critical reflexivity have been seen as important for development policy (Chambers 2015).

Stakeholder engagement for policy design and implementation has been on the rise, though the process itself is not beyond the influence of powerful stakeholders (Henning et al. 2019; Lopa and Ahmad 2016). Citizen participation in government decision-making has the advantage of building trust and strategic alliances and can gain legitimacy in policy decisions with the disadvantage of it being time consuming and the fear of creating more hostility towards the government (De Smedt and Borch 2022; Irvin and Stansbury 2004). Public deliberation can contribute evidence to

policy analysis processes that are more considered because they emerge from a process of citizen sensemaking. Allowing citizens to “talk policy” through deliberative democracy mechanisms can produce unique forms of policy knowledge (Stark, Thompson, and Marston 2021).

Despite the growing interest and research on consultative policymaking, there is insufficient literature on its application in the Global South. While there are cases of application of participatory tools to help the road to development (Nelson, Folhes, and Finan 2009), the importance of “user voice” and the links with civil society (Hooton 2010), and the participation of civil society groups are often restricted to implementation with limited participation in decision-making processes (Lopa and Ahmad 2016). Specifically, in the Indian context, civil society has been known for innovative experiments that have been scaled-up as national government policies and programs, and also taken to other countries by donors and UN agencies. While there is a need to engage, there is equal difficulty in doing so. Shrinking political space for questioning and criticising government and its officials is compounded by the lack of administrative and governance reforms and declining state capacity (Goswami and Tandon 2013). Online consultations have been seen as a policymaking innovation and institutionalised government transparency but have not consistently enhanced public participation in China (Balla and Xie 2020). Genuine engagement in the “co-production” of policy and services requires major shifts in the culture and operations of government agencies (Holmes 2011).

To add to these challenges of citizen participation is the nature of public consultation during an international crisis or emergency such as the COVID-19 pandemic. The spread of the internet has opened greater access to policy information and newer ways to dialogue with stakeholders. While the pandemic closed pathways for dialogue and consultation for the government, it paradoxically created newer ways of engagement. Online surveys, which are widely recognised legitimate methodological tools (Toepoel 2016), assume greater importance during events like the pandemic. In this paper, we present the results of an exercise in public consultation during the pandemic in the Indian context. We share insights on how, despite limitations, methodological innovations such as participatory online surveys can provide spaces for user voices that could potentially lead to better policy design. We explore this in the particular context of a policy implementation guideline for the spread of farmer producer organisations (FPOs) in India and reflect on the importance of early stakeholder engagement to build greater buy-in for policies by the government and encourage openness to more effective policy design.

2. Policies, protests, and the pandemic

Economic reforms in agriculture have been a contested territory in India with governments caught between polarising responses that are seen as corporate takeover by opponents and imperative in a globalised world. The Government of India introduced three farm bills during the pandemic in June 2020 that were hastily pushed through an ordinance route in Parliament with little consultation. Social distancing during the pandemic impacted policymaking with democratic processes of stakeholder consultations and dialogues suffering due to restrictions and the health emergency. The bills led to an awakened social movement and a year-long protest by several groups that finally led to the repeal of the bills. While there has been a lot of debate on the Indian Government’s major agri-reform bills (Nandakumar 2022; Narayanan 2021), a policy on operational guidelines for promoting FPOs received very little attention. It is often the nuts and bolts of the implementation processes, the everydayness of instruments like operational guidelines that determine the fate of public policies and often escape the attention of scholars and practitioners alike.

Unlike projects for building physical infrastructure like warehouses or electronic platforms, enabling the creation of member-owned institutions is a complex task, fraught with multiple and messy long-term objectives. There has been a shift in policy orientation from the older category of farmer organisation and cooperatives to producer organisations (POs) with greater market orientation. POs are seen as key actors for integrating small farmers into economic production chains,

important for democracy and human development, essential actors in bringing about innovation, and as vehicles to overcome social dilemmas (Gouet, Leeuwis, and van Paassen 2009). In India, FPOs have been seen by the government as an important institution in a paradigm shift from subsistence to enterprise, as envisaged in the multi-volume *Doubling Farm Incomes* (DFI) report (Prasad 2019). In continuation with the DFI recommendations, the Ministry of Agriculture and Farmers Welfare (MoAFW) announced its vision and scheme: "Formation and Promotion of Farmer Producer Organisations (FPOs)" for setting up 10,000 new FPOs in five years (GOI 2020). The FPO policy guidelines, like the farm bills, were released during the pandemic. The guidelines were in the making for over a year and an expert committee was constituted in February 2018. The new guidelines, however, varied with the recommendations of the expert committee.¹ The policy guidelines could potentially impact many existing stakeholders across the country, especially promoting institutions with grassroots presence. The pandemic prevented any physical consultation with these grassroots organisations. The key question was whether these guidelines were able to draw insights and experiences from the field, where over 7500 FPOs were already registered as producer companies between 2002 and 2019 and many are struggling to survive beyond their project period of three years.

3. Methodological innovations to enable consultation on FPO guidelines

Several technical and pragmatic operational guidelines are laid down in the new policy guidelines. Civil society organisations in India have been at the forefront of the spread of FPOs with many of them designated as resource institutions (RIs) or producer organisation-promoting institutions (POPI) for the rapid spread of FPOs since 2010. The new policy was premised on a greater market integration whereby not all CSOs were seen as effective. The ambitious policy of setting up 10,000 FPOs in five years, to add to the already existing 8,000-plus formed over several years, would require significant buy-in from multiple stakeholders for a successful rollout. To enable an informed consultation, an electronic survey (e-survey) was used as a methodological innovation that captured informed views of stakeholders. The aim was not to mimic conventional surveys in terms of sample size representation and numbers but to use an e-survey as a rapid policy appraisal tool to collate ideas and seek greater stakeholder involvement. Following Chambers' call for eclectic methodological pluralism (Chambers 2015) we have used the survey in combination with other tools like stakeholder consultations.

Online surveys are widely recognised legitimate methodological tools (Toepoel 2016) that assume greater importance during events like the pandemic. An elaborate, descriptive e-survey was designed to capture a spectrum of perspectives and conducted between 8 and 21 July 2020, shortly after the release of the guidelines. The summary of the survey results was shared with the respondents on 23 July and later through a webinar with the Chairman of the NABARD (National Bank for Agriculture and Rural Development), a key implementing agency under the new scheme, hosted by the National Association of Farmer Producer Organisation (NAFPO) on 31 July. The survey thus was aimed at sensitising the FPO ecosystem players to the operational guidelines and preparing them for the rollout and any possible course corrections. The choice of respondents was based on seeking to enlist key actors with experience of having worked in promoting FPOs and others who have followed the ecosystem's evolution over the years. Respondents included representatives of FPOs and FPO federations, promoting and training institutions, and other ecosystem players with extensive experience of working with FPOs, including a few non-governmental philanthropic donors that enabled funding support to FPOs independently or in partnership with the government. The e-survey questions followed the structure of the policy document and the e-survey was widely shared with organisations working with or promoting farmer collectives through networks working on agriculture. Networks on agriculture and rural livelihoods, such as the Revitalising Rainfed Areas Network (RRAN), National Rural Agrarian Society (NRAS), Rural Livelihoods, and the NAFPO were the main mechanism to reach out to potential respondents and were already discussing the fallout of the pandemic through electronic and WhatsApp groups. Limitations

of the survey were the absence of responses from direct stakeholders, farmer members, or Board of Directors of FPOs, as the policy was yet to be translated into Indian languages, and the absence of any process by the government to elicit responses.

Attempt was made to retain “rigour for complexity” (Chambers 2017) and while the form was open to all, participation of those knowledgeable about agricultural policies and nuances of policy implementation was deliberately sought. The essence was to ensure that the survey was rapid, and the results could be used to engage some of the key implementing agencies. Lupton’s (2021) recent overview of doing fieldwork during the pandemic highlights the advantages of qualitative online surveys that while small, could provide richly descriptive responses. The need to trade by-the-book precision for “roughly right” processes that could be non-traditional but can address the brittleness of public policy if these insights are at the early stages of policy development has also been highlighted by Schmidt and Stenger (2021).

Fifty-four respondents, including seven women, answered the 14 questions with 37 sub-parts, covering different aspects of the operational guidelines. Government agencies, at the state or federal level, were unlikely to, and did not participate in the survey. Of the 54 respondents, promoters and training institutions providing resources support (RIs and POPIs) formed the largest chunk (19), followed by FPOs and FPO federations (16 respondents). Non-governmental donors (7), actors in agricultural value chains (6), and academic institutions (5) were some of the others who participated in the survey.

The operational guidelines (GOI 2020) contained 17 sections that included activities to be taken up by FPOs, formation and identification of clusters, formation of a new National Project Management Agency (NPMA), budgetary provisions for FPO formation, incubation and management costs, provisions for equity grant, and integrated portal. The respondents were encouraged to reply only after reading the guidelines closely. The 14-part survey form covered the following broad heads and took an hour or more to complete by the respondents.

1. Organisation details and respondents work with FPOs.
2. The idea of new community-based business organisations (CBBOs), instead of RIs and POPIs, as the fulcrum for the rollout.
3. Revised membership criteria (from 1,000 members to 300), the focus on aspirational districts and the one district, one product (ODOP) strategy, and inclusion of older cooperatives as eligible institutions.
4. Roles and responsibilities of the new institutional architecture including the NPMA, CBBO, and state and district level committees.
5. Financial provisions – equity grant and credit, human resources, and compliance.
6. Training and institution building.
7. Policy evaluation, convergence, and E-NAM (Electronic National Agricultural Markets).
8. Overall general comments.

The questions addressed major provisions specified in the guidelines and respondents were asked to assess these provisions based on their appropriateness and also present recommendations that they believed would help improve the policy. A key challenge in administering was to ensure that respondents read the guidelines closely before answering the questions, unlike in normal surveys. Due to the short window of responses, some, though interested, could not respond in time. The responses were collated and cleaned for incomplete and incorrect interpretations (in a few cases) and are discussed below. The respondents were informed about the use of the data provided by them for academic purposes and verbal consent was sought to use the data in the resulting publication (Prasad, Dutta, and Ravichandran 2020).

The results of the survey enabled policy dialogues on the possible implications of the guidelines with key implementing agencies such as the National Bank for Rural Development (NABARD) and the Small Farmers’ Agri-Business Consortium (SFAC) on 31 July 2020 through a webinar by NAFPO.

4. Interpreting responses for policy dialogues

A significant proportion of respondents, over 39 per cent, had experience of over a decade of working with farmers and their organisations. The respondents were distributed across different regions of India with over 50 per cent from southern and western India and a few with presence across several states. One of the misgivings of the draft policy in March 2019 was whether Primary Agricultural Credit/Cooperative Societies (PACS) should be an integral part of the rollout given their significant institutional infrastructure for agricultural credit and their dominance by large farmers in many parts of the country (Prasad 2019). The new FPO policy allows the spread of FPOs registered as cooperatives through the National Cooperative Development Corporation (NCDC), which had hitherto not been part of the FPO movement. While the guidelines mention potential changes in by-laws to discourage political interference, 43 per cent of the respondents felt that the clause was insufficient, and 16 per cent felt the need for the clause to be more comprehensive and precise to deter state interference and prevent capture by elite organisations or groups. Some commented that the clause was too simplistic to address the organisational complexities of mistrust and power among large and small farmers, while others indicated that national-level amendments, including the pending ninety-seventh amendment to activate autonomous cooperative creation needed greater attention and could be the reform required at the national level.

The proposal to create produce-cluster areas for FPO formation and management through input from CBBOs was greeted with mixed responses. The Central Government's emphasis on commodity-based FPOs through the One District One Product (ODOP) raised concerns among respondents with some pointing to the complex demand trends of farming. "... strategies such as ODOP ... might have the counter-effect of reduction in crop diversity. Efforts at improving agri-marketing should not be at the cost of ... cropping patterns which are more suitable from an agroecological point of view" (R36). The choice of crops should be with the farmer groups allowing for more flexibility based on climate and market demands than prescribed centrally by the government. A significant change in the FPO guidelines from the 2013 guidelines (GOI 2013) has been a reduction in the minimum number of members to be eligible for the equity grant (from 1,000 to 300 in plain areas, and 100 in the hills). This has a bearing on the number of members required for the formation of the FPO too. Most respondents (58 per cent) thought that this minimum criterion for the creation of FPOs was welcome given the harsh geographies and sparse populations. A contrasting view, though, was that the FPOs should strive to serve larger numbers, covering up to four to five thousand households, to render small farmers' business enterprises viable and to compete with market forces. Some believed the guideline should allow flexibility based on local socio-economic and geographic factors.

4.1. The new institutional architecture: Will the new hierarchy help?

The new policy sought to bring more uniformity in guidelines and support across implementing agencies, unlike in the past. These were to be overseen and guided by a dedicated National Project Management Agency (NPMA) that would be responsible for data maintenance through an integrated portal. The policy envisaged a State-Level Consultative Committee (SLCC) and a District Level Monitoring Committee, in addition to cluster-based promotions. Respondents were encouraged to reflect on the design, constitution, and potential effectiveness of these bodies.

On the role and scope of NPMA, while over half of the participants opined that the criteria for setting up NPMA were well-defined, there were several respondents who believed the role was too big for one agency. Others believed that providing more regional centres could help enhance the monitoring and support. There were concerns about the lack of transparency in the recruitment and appointment procedures of the NPMA that seemed to favour only the bigger consulting firms. Only those with an annual turnover of USD 6 million could apply, thus ruling out many CSOs that were at the forefront of creating FPOs on the ground.

Participants were happy to note the provision made to FPOs for benefits from NPMA's credit guarantee scheme and advisory services; 48 per cent said it was a positive move, while others (27 per cent) believed that additional details, including the role and scope of NPMA, were required. The main concerns of those who felt it was inadequate arose due to the absence of clear criteria for supporting existing FPOs, especially with respect to representation of women and marginal communities at various levels. "Engagement of existing FPOs with special focus on engaging women farmers as shareholders needs to be outlined much more clearly. All registered FPOs must have at least 50 per cent membership of women farmers" (R7). Respondents also wanted clarification on whether the NPMA advisory services would be pro-bono.

The guidelines proposed three implementing agencies (IAs) – SFAC and NABARD are already promoting FPOs, and NCDC was added to this list. A fourth implementing agency, NAFED (National Agricultural Cooperative Marketing Federation of India Ltd.) was added with a mandate to promote 50 FPOs in 2020–2021. In addition, states may approach the Department of Agriculture, Cooperation and Farmers Welfare (DAC&FW) to create a state-level implementing agency. Most respondents believed that lessons from other initiatives should be incorporated in the proposal of forming the IAs. For instance, some viewed that CBBO capacities must first be established before any assistance can be extended to FPOs. Some also emphasised that there was no specific explanation of the nature of coordination between the three key agencies. Others suggested "roping in more seasoned grass-roots agencies including the State Rural Livelihood Mission (SRLMs) and Civil Society Organisations (CSOs)" (R5).

Only 19 people believed the criteria for identifying CBBOs to be adequate. The overall sense of the response was that the criteria were neither simple nor inclusive to promote the establishment of financially stable CBBOs. Some respondents were critical of the open opportunities given to state and central government agri-universities and Krishi Vigyan Kendras (KVKs). "Educational and research institutions like agricultural universities and KVKs should not be made CBBOs as they lack the capacity of understanding the communities" (R38). Several participants believed that the CBBOs could be overwhelmed and underfunded in line with their planned obligations. They also raised concerns about the lack of clarification and potential conflicts in training between IA and the CBBO especially in terms of fund flow. There appears to be no seed money provision, which could be a major roadblock, especially for smaller initiatives. Some also felt that the centralised procedure could delay payments and deter the formation of stable CBBOs.

4.2. Adequacy of financial provisions and training and capacity building

Less than half of the respondents felt that the timeline for facilitating financial independence of FPOs from CBBOs was feasible and adequate. While few appreciated the intention of making CBBOs accountable, others felt that the onus of completing set goals needed to be shared by the IAs as well. Yet others voiced the need for flexibility and response to dynamic situations of business enterprises in their formative stages. The need for greater investment was also suggested, especially in the first year.² Most respondents believed that the Rs 25 lakh (30,000 USD) cap of preparation and incubation costs was inadequate, as a lower incubation investment would lead to unstable FPOs and some suggested that incubating FPOs would need 1.5 to 4 times more. Respondents also agreed that a higher allocation of capacity building funds in the initial years would be more efficient than a fixed sum per year. The Centre has made a provision for producer members' own equity to be supplemented by a matching government equity grant to strengthen the financial base of FPOs through a credit guarantee fund. The sum proposed is up to Rs. 2,000 per farmer, fixed per FPO, to the overall limit of Rs. 15.00 lakh. Many respondents supported this position, even as a few raised concerns over the possibility that this could be a barrier to inclusion of women and tribal populations.

Is the capacity building focus on technical knowledge sufficient to empower Chief Executive Officers CEOs while enabling greater institute ownership in the longer term? While many felt that

this was a step in the right direction, there were several suggestions for including some training aspects that are not currently covered in the existing governmental training. These included moving away from a centralised, one-size-fits all approach and classroom training to 15 days on-job training, through working with successful FPOs in the region. Customised training sessions, and exposure visits, including to well-performing start-ups, could be considered. Some pointed to the need for professional consultants who could be hired at the state level and allocated on a rotational basis to CBBO–FPOs.

Some felt that the explicit focus of training should be on building capacities of local youth as professionals to manage the FPOs by cultivating a sense of ownership and taking calculated risks. “Building capacities of local youth as professionals to manage these FPOs may be necessary in remote areas. [This will enable] a sense of ownership and risk taking capacities” (R7). There were also suggestions on elements that should be added to the capacity building modules. These included the need for vision building, organisational development, business management, conflict management, financial and inventory management, team building, and communication, among other things. CEOs needed to be trained in “understanding the local political economy, local ideas of self-governance and entrepreneurship” (R8). It was felt that explicit training was required on corporate governance and legal compliances.

There were specific suggestions on the evaluation processes and time frames and the relation of FPOs to the market. These included the need to create a separate provision for women FPOs on the electronic National Agricultural Market (e-NAM) platform and greater public procurement of produce of FPOs, especially by government schools and the Public Distribution System (PDS). Beyond the specifics of the survey for FPOs, we conclude our paper by highlighting some of the larger issues on public consultation and building state capacity.

5. Building stakeholder support for policy implementation

The survey also elicited respondents’ overall comments on the policy document. Some responses that indicate possible directions and areas of concern are listed below.

The conflict redressal mechanisms are not defined. The policy assumes, by and large, that it is starting off a clean canvas even though thousands of FPOs exhibit varying levels of performance. The initial phase will cover territorial issues, with an overlapping of existing and new FPOs, and conflicts across organisations (CBBOs and local POPIs). Who will resolve these conflicts and how will they be resolved? (R39)

The experience of facilitating FPOs via the roles played by civil society and resource organisations in incubating FPOs has been ignored so far. They neither figure in implementation and capacity building and nor in policy making bodies at the district, state, and national levels. ... Capacity building of CBBOs, FPOs, and Implementing Organisations is the weakest aspect of the guidelines. (R43)

The most significant finding of the survey or consultation exercise is the lost opportunity for policy support. The study revealed that the commitment and optimism of various stakeholders on the FPO policy was, however, tempered with pragmatic concerns regarding the implementation of the FPO building endeavour. There was significant apprehension about excessive centralisation with the changed norms and a new NPMA in place. The poor investment in capacity building of FPOs at different levels was also a major concern. The lack of any reference to relevant provisions of the pre-existing 8,000-odd FPOs is a matter of concern. As recent studies have pointed out, their viability is still a significant concern (Neti and Govil 2022). Recent field insights across India indicate the need for a greater role for the state in creating an enabling entrepreneurial ecosystem for FPOs and the dangers and pitfalls of pursuing targets without recognising significant implementation challenges (Prasad and Dutta 2022). Respondents raised issue about issues of inclusion, pointing to the need to go beyond agriculture to explore enterprises in animal husbandry, poultry, and forest produce on which several small and marginal farmers, women, and tribal households depend.

Another lost opportunity was that of the government being able to promote its idea of ease of doing business in agriculture. As the operational guidelines were rolled out, the faith of farmers and their representatives in the implementing mechanism was low. In the absence of an active engagement, as remarked by a former agricultural secretary, “the current set of guidelines may not inspire confidence among the farmers to venture into a collective entrepreneurial mode. They may find it hard to negotiate the bureaucratic maze” (Nandakumar 2022).

6. Strengthening state capacity in a post-pandemic world

As farmer-owned institutions, FPOs could highlight a different possibility in agri-market reforms, the issue that has polarised responses on the (now revoked) farm bills. Some FPO federations supported the reforms, as they saw themselves as farmer institutions that could deliver value to their members and provide voice to them in the older markets and with corporate buyers. Collective enterprises may have divergent modes of operating under, and interpreting, the bills, thus reinforcing the need for context-specific policy mediations.

This paper presents insights from a consultative exercise by engaging with different stakeholders during the pandemic through an e-survey that demonstrates the possibilities of strengthening representative processes through deliberative democratic dialogues (Pieczka and Escobar 2010). The study was not meant as a substitute for real democratic dialogues with farmers and their representatives nor intended to be a comprehensive or representative collation of recommendations. Rather, the paper illustrates that academic institutions can play a pro-active role in policy making processes as facilitators, opening spaces for dialogue that otherwise do not exist for many stakeholders.

Methodologically, the policy consultation exercise illustrates the need for rapid and participatory innovations to enhance public consultations even during the pandemic as the state can easily deny such possibilities during such emergencies, due to the fear that consultations could lead only to policy opposition. This study provides evidence, on the contrary, that policy implementation could be strengthened if views are pro-actively sought early from stakeholders outside the government. More specific to the context of FPO promotion guidelines, consultations can enhance state capacity for creating policies that could draw upon, rather than bypass, the rich and diverse experiences of FPOs of the last decade (Prasad 2021). The study is not without limitations. It is important to acknowledge that the study itself suffered from pandemic-induced constraints on physical meetings and from associated challenges. Further, rather than aim for a rigorously designed survey the essence of the survey was, to use Chambers’ phrase, aimed at rigour for complexity with a view to sensitising key officials on the pulse of stakeholders. The academic writing of the details of the survey followed later (Prasad, Dutta, and Ravichandran 2020).

We also do not suggest e-surveys as a standard tool nor as a substitute for participatory processes that involve primary stakeholders. However, there is a need to explore the use of these rapid tools to the repertoire of participatory methods that can enable citizens voice, even in cases where their physical presence has been curtailed or is not possible due to practical limitations. Also, it should be noted that while this experiment in policy consultation did not change anything significantly, as the government was already invested heavily in the scheme, leaving little scope for course correction, it did, however, raise important questions on whether a pandemic is a good excuse to do away with consultations. With the government hard pressed to indicate evidence of consultations, it is a bit surprising why such consultations are so few and far between, especially in Indian agriculture. In contrast, the new Science Technology and Innovation Policy that has been in the making for over six months has evidence of close to 300 consultations with different experts.

Important stakeholders – the promoting institutions that built the FPO movement in the past – were not consulted in agricultural policy design which is all the more important given its decentralised nature. CBBOs today are contractually bound by the NPMA and the state has avoided any serious dialogue on a difficult policy, preferring to sub-contract its tasks to a private consulting firm. Declining state capacity in developing countries continues to remain a key policy challenge

and especially so in agriculture in India. Historically, the agricultural establishment has been unable to engage with CSOs, unlike the Rural Development Ministry that, for instance, created a separate National Mission Monitoring Unit (NMMU) while upscaling the National Rural Livelihood Mission under its wings and drawing on expertise from outside. In contrast, the rollout of the 10,000 FPO scheme relied more on external consultants (Prasad 2021). Through their responses, many respondents raised the need for greater inclusion of women and marginalised farmers in the FPO scheme. While 78 per cent of policy documents, globally, recognise the role of women in agriculture, only 19 per cent have explicit gender-related policy goals (FAO 2023). According to World Bank data, women form 55 per cent of agricultural work force in India, yet only 14 per cent of them have operational agricultural holdings, as per the 2015–2016 Agricultural Census (Prasad, Kanitkar, and Dutta 2023a). A recent study has shown that while the number of FPOs in India has more than doubled since 2005–2006, the inclusion aspect has worsened. In the last two financial years, the percentage of women FPOs has reduced to only 2.1 per cent of the total FPOs (Neti and Govil 2022). Engendering FPOs would require more targeted approaches that include enabling access and rights to women farmers, which have not been addressed in the 10,000 FPO scheme (Vasavada 2021). More affirmative action aimed at women FPOs as well as incentivising mixed gender FPOs by increasing the number of women shareholders and Board members has recently been proposed since women operate most of the small farms (Srinivasan 2022), and studies (Bhamoriya and Paul 2021; Patidar and Vasavada 2021) have shown women FPOs to have demonstrated greater better resilience and long-term performance (Prasad, Kanitkar, and Dutta 2023b).

Policy dialogues, while time consuming, simultaneously provide both early warning signals on poor policy design as well as opportunities for innovative suggestions to enable critical political buy-in. The policy exercise also highlights the lesser-recognised role of academic institutions in facilitating knowledge dialogues and creating alternate platforms for an engaged discussion by stakeholders. It is hoped that similar experiments would be carried out in other countries and sectors too to bring greater focus on policy implementation and state capacity.

Notes

1. One of the authors was a member of the Expert Committee set up by SFAC to develop uniform policy guidelines. The committee met thrice and presented recommendations in July 2018, highlighting the roles of both central and state governments in enabling ease of doing business for FPOs. The version later prepared by the Ministry of Agriculture in March 2019 involved substantial changes in the institutional design that were perceived not in interests of smallholders. The final guidelines prepared by the Ministry were presented to stakeholders in November 2019 for a national rollout that was delayed by the pandemic to July 2020.
2. A major deviation from the new guidelines is a phased payment structure and an explicit reference to the creation and incubation of FPOs over a potential five-year span of up to Rs 25 lakhs over five years and Rs 18 lakhs over the first three years of service. The provisions shall include the support for a CEO and an accountant (Rs 35,000/month), one-time registration cost (maximum of Rs 40,000/year), office rent, utility charges, etc.

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