



agriculture, forestry & fisheries

Department:
Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

THIRD CONSULTATIVE REPORT ON COMPREHENSIVE PRODUDCER DEVELOPMENT SUPPORT (INCEPTION – MARCH 2018)

20 April 2018

TABLE OF CONTENTS

LIST OF ACRONYMS.....	ii
1. BACKGROUND AND CONTEXT	1
2. RATIONALE	2
3. METHODOLOGY	2
4. STAKEHOLDER CONSULTED.....	3
5. OUTCOMES/KEY ISSUES RAISED DURING CONSULTATIVE PROCESSES FOR THE POLICY	9
6. CONCLUSIONS.....	42

LIST OF ACRONYMS

ACPC	:	Agricultural Credit Policy Council
ADB	:	Agricultural Development Bank
AgriSA	:	Agriculture South Africa
AIMS	:	Agricultural Information Management System
ARC	:	Agricultural Research Council
ASRDC	:	Agricultural Sustainable Rural Development Committee
BAWSI	:	Black Association of the Wine and Spirits Industry
CARRD	:	Center for Agrarian Reform and Rural Development
CASP	:	Comprehensive Agricultural Support Programme
CASP QRM	:	Comprehensive Agricultural Support Programme Quarterly Review Meeting
CGA	:	Citrus Growers Association
CPDS	:	Policy on Comprehensive Producer Development Support
CSO	:	Civil Society Organisations
DED	:	Department of Economic Development
DFDC	:	Deciduous Fruit Development Chamber
DPME	:	Department of Planning, Monitoring and Evaluation
DPs	:	Development Partners
DRDLR	:	Department of Rural Development and Land Reform
DTI	:	Department of Trade and Industry
ESE	:	Ethiopian Stock Exchange
EXCO	:	Executive Committee
FSA	:	Forestry South Africa
FSA	:	Fruit South Africa
FS DARD	:	Free State Department of Agriculture and Rural Development
GDARD	:	Gauteng Department of Agriculture and Rural Development
GFADA	:	Grain Farmer Development Association
IDC	:	Industrial Development Corporation
IFAD	:	International Fund for Agricultural Development
KCEP	:	Kenya Cereal Enhancement Programme
KZN DARD	:	KwaZulu-Natal Department of Agriculture and Rural Development
LDARD	:	Limpopo Department of Agriculture and Rural Development

MANCO	:	Management Committee
NAMC	:	National Agricultural Marketing Council
NAFU – EC	:	National African Farmers Union - Eastern Cape
NDP	:	National Development Plan
NEDA	:	National Economic and Development Agency
NERPO	:	National Emergent Red Meat Producers Organisations
NT	:	National Treasury
OCFCU	:	Oromia Coffee Farmers’ Cooperative Union
PAO	:	Poverty Alleviation Office
PDAs	:	Provincial Departments of Agriculture
RMPO	:	Red Meat Producer Organisation
SAPPO	:	South African Pork Producers’ Organisation
SASA	:	South African Sugar Association
SASA	:	South African Sugar Association
SATGI	:	South African Table Grape Industry
SAUFF	:	South African United Fishing Front
SBC	:	Small Business Corporation
SEFA	:	Small Enterprise Finance Agency
SEIA	:	Socio-Economic Impact Assessment
SIZA	:	Sustainability Initiative of South Africa
WC DOA	:	Western Cape Department of Agriculture
YARD	:	Youth in Agriculture and Rural Development

CONSULTATIVE REPORT ON NATIONAL POLICY ON COMPREHENSIVE PRODUCER DEVELOPMENT SUPPORT

1. BACKGROUND AND CONTEXT

Government has embarked on numerous initiatives to provide financial and other non-financial support targeting mainly the smallholder producers. The intent was to mainstream participation of smallholder producers in the sector through the provision of on-and-off farm infrastructure, improve extension support, provide training and mentorship, market access, provide access to appropriate technologies, increase localised production, improve food and nutrition security and improve the livelihoods of rural households. Coupled with this, there have been other entities from public and private sector, non-governmental organisations etc. who also provide various forms of support to the sector. Of the interventions listed above, access to on – and off –farm infrastructure was the one found to have significant success factor by the recent National Evaluations conducted. Although production increased for both livestock and crops and livelihoods improved of beneficiaries of the programme, the impact was insignificant given that the scope and coverage of the programme is too wide (2014 CASP impact Study, DPME)

Despite these interventions, the challenges confronting the sector such as skewed participation and inadequate, ineffective and inefficient support and delivery systems as identified in the Strategic Plan for South African agriculture (2001) still exists. There is still a need to substantially contribute to the achievement of the national development objectives (i.e. *poverty eradication, economic growth and job creation*) as stipulated in the National Development Plan (NDP) in which agriculture is identified as one of the primary drivers of growth in the economy.

There is a further need to guide interventions (support services) provided to the various categories of producers by Government, the private sector, Civil Society Organisations (CSOs) and Development Partners (DPs) and other sector stakeholders. Hence, the Department of Agriculture, Forestry and Fisheries is in the process of developing a Policy on Comprehensive Producer Development Support (CPDS).

2. RATIONALE

Stakeholder consultation is one of the critical steps in developing a policy as it ensures that every practical and viable policy alternative has been considered. Stakeholders and those closest to a problem or affected by policy changes can sometimes suggest useful ways to solve it because they often have more and better insight about the practical impacts of policies that the officials developing them.

Consultation will provide an opportunity to get the views of affected stakeholders and for developing creative and realistic solutions and strategies to respond to the identified challenges. This is one of the most important elements for creating robust and comprehensive agricultural planning outcomes.

Furthermore, question 6 of the Final (Phase 2) Socio-Economic Impact Assessment (SEIA) requires policy developers to report on consultations on the proposal with the affected government agencies, business and other groupings. Three key questions are of utmost important in this regard i.e. what do they (stakeholder) see as the main benefits, costs and risks? Do they support or oppose the proposal? What amendments do they propose, and have these amendments been incorporated in your proposal?

It within this context that the Policy Drafting Team endeavoured to consult as widely and genuinely as possible to ensure that they solicit inputs from affected and interested stakeholder and most importantly to get inputs from other policy makers to avoid creating overlapping regulatory burden to producers and implementers.

3. METHODOLOGY

In line with the Terms of Reference for the development of a Policy on Comprehensive Producer Development Support, a four tier consultation process was proposed from planning to finalisation of the policy; namely:

- **Scoping exercise:** This will include consultation with experts locally and internally to get a broader view of the trends and best practices in terms of producer support.
- **Internal consultation:** using internal structures of DAFF i.e. Agricultural Sustainable Rural Development Committee (ASRDC), Management Committee

(MANCO) and Executive Committee (EXCO) this consultation will be undertaken to ensure policy alignment with existing policies, plans and strategies of the department. This was also expanded to include technical directorates who were invited to make presentation to the Drafting Team on policies and programmes relating to producer support.

- **External consultation with key stakeholders:** This will involve consultations with key stakeholders within the sector in the form of Reference Group and Inter-Departmental meetings as well as MINTECH to present progress with regard to policy development and solicit inputs and comments on the draft policy.
- **External consultation with the general public:** Consultation with the general public will also be done.

Furthermore, members of the Policy Drafting Team and some senior management staff of the Food Security and Agrarian Reform Branch participated in key projects/events relating to producer support including the following: (i) Diagnostic Evaluation of the Government Support to Smallholder Producers, (ii) Operation Phakisa for Agriculture, Land Reform and Rural Development, and (iii) Integrated Agricultural Development Finance Conference. Inputs from the above activities have also been considered in compiling this report except for the Operation Phakisa which was still embargoed at the time of writing this report.

4. STAKEHOLDER CONSULTED

The following stakeholders were consulted/engaged using the methodology described in section 3.

Table 1: List of stakeholders consulted on the Policy on Comprehensive Producer Development Support

Meeting/Engagement Type	Name or description of stakeholders consulted
Scoping exercise	<u>Local:</u> University of Free State, University of Venda, Free State Department of Agriculture and Rural Development, Siena Human Capital. <u>International:</u>

Meeting/Engagement Type	Name or description of stakeholders consulted
	<p>(i) <u>Ethiopia</u>: Ethiopian Stock Exchange and Oromia Coffee Farmers' Cooperative Union (OCFCU).</p> <p>(ii) <u>Kenya</u>: International Fund for Agricultural Development Kenya Country Office, Kenya Women Micro Finance Bank, Kenya Cereal Enhancement Programme, Equity Bank Kenya, Financial Sector Deepening, Consultative Group to Assist the Poor, PROFIT, Safaricom, Mezzanine, Jamii Bora Bank Ltd.</p> <p>(iii) <u>Zambia</u>: Ministry of Agriculture</p> <p>(iv) <u>China</u>: China Banking Regulatory Commission, Renmin University, Research Bureau at the People's Bank of China, Agricultural Development Bank, Sanxia Bank, Jingdong Microcredit Company, rural community mutual fund, Poverty Alleviation Office, Rural Development Institute of Chinese Academy of Sciences.</p> <p>(v) <u>Philippines</u>: Small Business Corporation, The Department of Trade and Industry, Department of Agrarian Reform, Department of Agriculture, Land Bank, Agricultural Credit Policy Council (ACPC), National Economic and Development Agency (NEDA), Center for Agrarian Reform and Rural Development (CARRD)</p> <p>(vi) <u>Kyrgyzstan</u>: Dairy Spring Milk Collection Point</p>
Project Management Unit ¹	<p>The following directorates/sub-programmes were represented during the first Project Management Unit meeting: Development Finance Coordination, Policy Research Support, Cooperative and Enterprise Development, BBBEE Charters Compliance, Marketing, Agro-Processing Support, Subsistence Farming, Smallholder Development, Infrastructure Support, Sector Education and Training, Sector Transformation, National Extension Support, National Extension Reform, Inspection Services, Food Safety and</p>

¹ Due to poor attendance, the format of this meeting was changed to Drafting Team Meetings where technical directorates were invited to present their programmes and policies.

Meeting/Engagement Type	Name or description of stakeholders consulted
	Quality Assurance, Agricultural Inputs Control, Food Import and Export Standards, Plant Production, Plant Health, Genetic Resources, Veterinary Public Health, Animal Health, Smallscale Forestry, Water Use and Irrigation Development, Climate Change and Disaster Management, Land Use and Soil Management, Research Support (fisheries).
Drafting Team meetings	The following directorates were engaged through the Drafting Team meetings:
ASRDC	Meeting attended by the Directors of DAFF
EXCO	Meeting attended by members of the Executive Committee of DAFF
MINTECH	Meeting attended by the Heads of Departments for Provincial Department of Agriculture (and Rural Development)
Provincial Extension Conferences	Conferences attended mainly by Extension Practitioners in the provinces. The Policy was presented in the following provinces: Limpopo, North-West, Northern Cape, Gauteng, Free State and KwaZulu-Natal.
Consultative meeting with PDAs	Meeting attended by representatives from Provincial Department of Agriculture (and Rural Development)
Natural Resources Management (NRM) Working Group	A MINTECH sub-committee responsible for overseeing activities relating to NRM. Representatives from PDAs responsible for NRM attend such a meeting.
Agriculture Policy, Programme and Service Delivery Consultative workshop (Gauteng)	Meeting organised by Gauteng Department of Agriculture and Rural Development (GDARD) attended by the GDARD staff with the HOD – GDARD in attendance.
Public Sector Forum for Extension and Advisory Services	Meeting attended by the Directors of Extension and Advisory Services of the Provincial Department of Agriculture (and Rural Development)
Consultative meeting with National	Meeting attended mainly by representatives from the national departments such as Water and Sanitation, Trade and Industry,

Meeting/Engagement Type	Name or description of stakeholders consulted
Departments	Rural Development and Land Reform etc.
Consultative meetings with commodity organisations ²	Meeting attended by representatives from commodity organisations. The following commodities were represented in either or both meetings: Southern Africa Food Lab (SAFL), National Red Meat Producers Organisations (NERPO), Forestry Sector Charter Council, Red Meat Producer Organisation (RMPO), HortGro, Sustainability Initiative of South Africa (SIZA), Forestry South Africa (FSA), Citrus Academy, South African United Fishing Front (SAUFF), South African Sugar Association, GrainSA, Agricultural Research Council (ARC), Oceana Group, Black Association of the Wine and Spirits Industry (BAWSI), Impendulo Foundation, Subtrop, Citrus Growers Association (CGA), South African Pork Producers' Organisation (SAPPO), South African Sugar Association (SASA), South African Table Grape Industry (SATGI), Fruit South Africa (FSA), Industrial Development Corporation (IDC), Deciduous Fruit Development Chamber, Grain Farmer Development Association (GFADA), Winter Cereal Trust, VinPro.
Reference Group meetings ³	A team of experts from government, industry, academia, civil society organisations, farmers union etc. who were appointed by then Acting Director-General to provide advice and oversight to the policy development process.
Second Consultative meeting with Commodity Organisations	The meeting was attended by DAFF and commodity organisations. The following were in attendance: Citrus Crowsers Association (CGA), National Red Meat Producers Association (NERPO), South African Pork Producers' Organisation (SAPPO) , South African Table Grape Industry (SATGI), Fruit South Africa (FSA), Industrial Development Coporation (IDC), Deciduous Fruit Development Chamber (DFDC), Citrus Academy, Southern Africa Food Lab, Red Meat Producers Organisation (RMPO), Grain

² Two meeting were held as at the time of drafting this report.

³ Two meeting were held as at the time of drafting this report.

Meeting/Engagement Type	Name or description of stakeholders consulted
	Farmer Development Association (GFADA), Winter Cereal Trust, South African United Fishing Front (SAUFF), VinPro, International Fund for Agricultural Development (IFAD), South African Sugar Association (SASA), Agricultural Research Council (ARC)
CASP Quarterly Review Meeting	This meeting is attended by DAFF and PDAs. Other stakeholders also attend as per invitation.
Stakeholder Consultative meeting on a Diagnostic Evaluation of the Government Support to Smallholder Producers	This meeting was mainly attended by government officials (both national and provincial), commodity organisation, academic institutions, research institutions, farmers union, financial institutions, international organisations, and other development partners.
Stakeholder Workshop on the Development of a Comprehensive Producer Support Strategy in Limpopo	Limpopo Department of Agriculture and Rural Development (LDARD), DAFF, Land Bank, Nulandis, <i>the</i> DTI, PicoTeam, Progress Milling, John Deere, DWS, IDC, McCain and other private sector representatives.
Operation Phakisa for Agriculture, Rural Development and Land Reform	A team of experts from government, industry, academia, civil society organisations, farmers union etc. The following organisations participated during the Operation Phakisa's Producer Support Workstream: DAFF, Agriculture South Africa (AgriSA), Department of Rural Development and Land Reform (DRDLR), Free State Department of Agriculture and Rural Development (FS DARD), KwaZulu-Natal Department of Agriculture and Rural Development (KZN DARD), National African Farmers Union - Eastern Cape (NAFU EC), National Agricultural Marketing Council (NAMC), National Treasury (NT), Small Enterprise Finance Agency (SEFA), Youth in Agriculture and Rural Development (YARD), Department of Economic Development (DED), Industrial Development Corporation (IDC), Gauteng Department of Agriculture and Rural Development (GDARD), Western Cape Department of Agriculture (WC DOA), ARC, Land

Meeting/Engagement Type	Name or description of stakeholders consulted
	Bank, Northern Cape Department of Agriculture and Rural Development (NC DARD), Fabric, Matuba Wines,
Integrated Development Finance Policy Conference (joint conference with Policy on Comprehensive Producer Development Support	The conference was attended by about 100 participants from government, industry, academia, civil society organisation, financial institutions, private sector, civil society organisations, farmers union, international organisations etc.

5. OUTCOMES/KEY ISSUES RAISED DURING CONSULTATIVE PROCESSES FOR THE POLICY

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
A. General Comments			
A1. Language usage	Acting Director-General (ADG)	Need to be consistent in the usage of language especially relating to support whether we adopt activity based statements (e.g. Provision of..) or Outcomes based statements.	This has been revised in the document but a technical policy write-up is still needed.
A2. Inclusion of Forestry and Fisheries	EXCO, ASRDC, NRM Mintech Working Group, Natural Resource Management (NRM) MINTECH Working Group, Commodity Organisation (Forestry SA, SAUFF etc.)	There is a need to include Forestry and Fisheries in the Policy.	Strides have been made to ensure that generic and specific problems and support interventions for forestry and fisheries are included in the policy. Fisheries support still requires some attention as this is not adequately addressed in the document.
A3. Gender Sensitivity	Head of Department (Western Cape Department of Agriculture)	Gender sensitise the document	The document is gender neutral and a section on transformation was also added to address/target specific needs of women.
A4. Comprehensive list of institutions	Head of Department (Western Cape Department	Add a comprehensive list of institutions providing support as an annexure to	<ul style="list-style-type: none"> o A draft document containing a list of institutions (both public and private

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
providing support	of Agriculture), also embedded in the Improvement Plan for the Diagnostic study for Smallholder Support	the policy	sector) providing support to producers has been developed.
A5. Qualifying criteria	CASP QRM	<ul style="list-style-type: none"> ○ There is a need for a strict qualifying criteria 	<ul style="list-style-type: none"> ○ The prerequisite has been strengthened
A6. Engaging other stakeholders	CASP QRM	<ul style="list-style-type: none"> ○ Get the inputs of other departments that will play a role in the space of producer support 	<ul style="list-style-type: none"> ○ Various mechanism described in the consultation methodology were used to ensure that the policy development process is inclusive.
	MINTECH	<ul style="list-style-type: none"> ○ Engage the Department of Rural Development and Land Reform 	<ul style="list-style-type: none"> ○ The DRDLR was engaged since inception of the policy and they are still playing a major role in the policy development process
A7. Procurement system	CASP QRM	<ul style="list-style-type: none"> ○ There is a need to propose a procurement system in government. 	<ul style="list-style-type: none"> ○ Based on the lessons from Nigeria and Kenya, the policy is proposing the implementation of an e-voucher system for the provision of support to beneficiaries.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
A8. Evaluation Studies	Reference Group	<ul style="list-style-type: none"> ○ Consider evaluations that are being done through the leadership of the DPME 	<ul style="list-style-type: none"> ○ All evaluations on programmes for smallholder support were studied in details and some of the recommendations have been incorporated into the policy.
A9. Business models to be supported	Reference Group	<ul style="list-style-type: none"> ○ The model of supporting the establishment of farmer group especially cooperatives should be discouraged as there are few if any success stories of implementing such models in South Africa. 	<ul style="list-style-type: none"> ○ The policy does not advocate for any specific model. Robust business models will be developed and assessments individually.
	SASA	<ul style="list-style-type: none"> ○ The Sugar industry would further welcome an opportunity to present to the Technical Task Team the support programmes and tools that are in place to support black guidelines on production costs and mechanisation requirements. 	<ul style="list-style-type: none"> ○ A proposal for a study tour in the sugar industry is noted and arrangements will be made in collaboration with relevant representative(s) of the sugar industry.
A10. Women, Youth and People with		<ul style="list-style-type: none"> ○ The policy need to be clear on inclusion of these groups including 	<ul style="list-style-type: none"> ○ New targets for women, youth and people with disabilities have been set in

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
disabilities		former detainees; pro-village support to be considered; to tailor support for agricultural graduates with an intention to enter into agribusiness and assist them to avoid red tapes; capacity building and training of these groups is welcomed in the policy;	the policy.
A11. Support for policy	SASA	<ul style="list-style-type: none"> ○ The Sugar industry is in support of the draft policy. However, as motivated above, the policy needs to be regulated to ensure compliance by Provincial Departments, and all other government institutions that are involved in the agricultural sector. 	<ul style="list-style-type: none"> ○ We thank the sugar industry for supporting the draft policy and we have noted comments made by the industry as well. The policy will indeed need to be regulated – a Producer Support Bill will be developed after the policy has been approved.
	MINTEC	<ul style="list-style-type: none"> ○ The Agricultural Research Council (ARC) is in support of the policy. 	<ul style="list-style-type: none"> ○ The policy provide absolute numbers on thresholds but also provides ranges in

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>However, it recommended that the Drafting Team should “stay away from absolute numbers but provide ranges”.</p>	<p>terms of annual turnover used as a proxy to determine the category of producer.</p>
A12. Policy modelling	CASP QRM	<ul style="list-style-type: none"> ○ Is there an analysis where the policy was modelled 	<ul style="list-style-type: none"> ○ Various studies were conducted notably international best practices which assessed support programmes and policies in China, Brazil, Kenya, Philippines, Zambia, Nigeria etc. A pre-and post-1994 support programmes were also analysed.
To consider the Business Orientation of producers		<ul style="list-style-type: none"> ○ The support needs to be economic and business-oriented 	<ul style="list-style-type: none"> ○ One of the policy principles is premised on agriculture being viewed as a business. Hence support will be based on a bankable business plan for Smallholder and Medium Scale commercial producers.
Efficient provision of services		<ul style="list-style-type: none"> ○ Need to improve the timing of provisions of services and goods 	<ul style="list-style-type: none"> ○ An sms or card based E-voucher System will be introduced to ensure timely provision of services ○

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
			producers.
Consideration of recommendations of Evaluations on programmatic issues		<ul style="list-style-type: none"> ○ Need to overhaul and redesign all farmer support programmes 	<ul style="list-style-type: none"> ○ This is acknowledged and has been addressed through the introduction of blended financial support.
		<ul style="list-style-type: none"> ○ CASP should be institutionalised or mainstreamed and the scope and coverage of CASP should be reduced to increase its effectiveness 	<ul style="list-style-type: none"> ○ This is being addressed and there is already funding committed by the National Treasury in this regard.
		<ul style="list-style-type: none"> ○ Increase efforts to promote market access and commercialisation. 	<ul style="list-style-type: none"> ○ The Department has a programme in the pipe line to specifically address black producer commercialisation in the sector.
		<ul style="list-style-type: none"> ○ Increase efforts towards building the capacity of the projects to be self-reliant and self-sufficiency. 	<ul style="list-style-type: none"> ○ The policy has guiding principles and specific sections that address issues on skills audit, capacity development and introduces own contribution to effect self-reliance amongst producers.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
B. Technical Comments			
B1. Problem Statement	DAFF ADG	<ul style="list-style-type: none"> ○ Need to expand and focus on key problems e.g. inequitable access manifest itself in various ways including access to land, water, energy 	<ul style="list-style-type: none"> ○ This has been included in the revised Policy "Problem Statement"
	South African Sugar Association	<ul style="list-style-type: none"> ○ Section 2.1 states that "<i>access to finance is also a critical challenge facing smallholder producers who cannot use their land as collateral as a result of their rights to land</i>". Smallholder farmers on communal land do have rights to land, but this has not been translated into a registered right that would enables them to approach financial institutions. ○ Section 2.4. SASA agrees that co-ordination and integration are key 	<ul style="list-style-type: none"> ○ The relevant section has been amended to include the comment from SASA ○ Noted with appreciation.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>challenges and has often led to the limited resources of government not being strategically allocated to ensure maximum benefit.</p> <ul style="list-style-type: none"> ○ The current CASP and RADP programmes are a good example of poor co-ordination. There is a lack of joint planning by government departments at an operational level, which has resulted in either “double dipping” or frustrations on the part of farmers in cases where both grants are required to be accessed simultaneously to fund different, but interrelated aspects of a project. 	
B2: Policy objectives	Reference Group	<ul style="list-style-type: none"> ○ The policy should be more specific in terms of what needs to be achieved. The objectives of the 	<ul style="list-style-type: none"> ○ The objectives were amended but still needs to be tested using the SMART principles.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		policy should be clear and specific (SMART).	
	MINTECH	<ul style="list-style-type: none"> ○ The policy serves as a guiding document in terms of how we should package support to farmers across the value chain. There will be some modification based on provincial peculiarities. ○ 	<ul style="list-style-type: none"> ○ This is noted
B3: Guiding principles	Western Cape Department of Agriculture	<ul style="list-style-type: none"> ○ Capped support and exit strategy should be developed as a graduation plan. ○ Use municipal template for registration of poor (indigent) households 	<ul style="list-style-type: none"> ○ Special workshop to discuss guiding principles was organised with commodity organisations. A revised section on guiding principles has been incorporated in the policy. ○ This has been included in the guiding principles

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
	CASP QRM, PDAs	<ul style="list-style-type: none"> ○ There is a need to relook at the proposed capped support thresholds as this may exclude other enterprises. ○ The Policy should be strict on the qualifying criteria otherwise funding will be inadequate 	<ul style="list-style-type: none"> ○ New proposal on thresholds were developed by a Special Task Team comprising of DAFF, PDAs, and ARC. ○ The policy proposes a number of principles and requirements for the various categories of producers including preregistration and on-going reporting of farming activities.
	Provincial Departments of Agriculture	<ul style="list-style-type: none"> ○ Take care not to re-invent the wheel in the case of registration of producers; it will be important to do a scoping exercise on existing legislation, programmes and other support interventions available to producers. Policy alignment therefore becomes critical in developing policy intervention measures. ○ 	<ul style="list-style-type: none"> ○ This exercise has been initiated and will be attached as an annexure to the policy.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
	SAPPO	<ul style="list-style-type: none"> ○ Training to the approved candidates be provided by the industry ○ Required bankable business plans to be drafted and approved with the inputs from the industry ○ Depending on the approval criteria, famers in all categories have the potential to contribute in one way or another. With assistance of the extension 	<ul style="list-style-type: none"> ○ Training is one of the key critical elements of comprehensive producer development support. We acknowledge the industry's readiness to provide training to support recipients but also there will be additional training that may be required which might be outsourced from relevant competent service providers other than the industry. ○ This is noted hence the industry should form part of the adjudication team at local level (district/provincial). ○ This is noted and it was further confirmed by other stakeholders that all producers should contribute.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>officials from both government and the industries, candidates with potential can be identified.</p> <ul style="list-style-type: none"> ○ Preference be given to existing farmers in desperate need of financial assistance and extension support in order to grow. In this way, the farmer has automatically contributed (monetary). The farmer will further have to contribute in kind by provision of both financial and production records, provision of the business plan (not necessarily bankable), declaration of interest as well as the availability of the farmer. Please note that smallholder farmers 	<ul style="list-style-type: none"> ○ This is noted with appreciation.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>cannot always be full-time farmers as the unit's might not be sufficient to be the main income.</p> <ul style="list-style-type: none"> ○ Support to the farm can be terminated if commitment and co-operation is not shown from the farmer. However such instances can be avoided by having a memorandum of understanding signed between the beneficiary and the financier (DAFF). ○ Recommended that the farm be existed at a commercial level than at a break-even point, or decision be based on a case by 	<ul style="list-style-type: none"> ○ This has been added on section 10 "Roles and responsibilities" under the "Role of Producers" ○ This is still within the proposed Exit Strategy of the draft policy except the fact that second bankable business plan will be financed at 50:50 own

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>case. To move from a 100 sow unit to a commercial 200 sow unit, financial assistance will still be necessary. The farm can be existed at least 3years after running as a commercial.</p>	<p>contribution.</p>
	National Departments	<ul style="list-style-type: none"> ○ To include value for money and accountability both from government implementing agents and producers 	<ul style="list-style-type: none"> ○ This has been included as a principle in the policy.
	MINTECH	<ul style="list-style-type: none"> ○ Producer registration: Agricultural Information Management System (AIMS) already registers producers (vulnerability assessment project is going on). You need to have systems in place to smooth implementation of the policy. 	<ul style="list-style-type: none"> ○ The Directorate ICT is busy with the establishment of a Producer Register System which is expected to be finalised when the policy is approved by Cabinet.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<ul style="list-style-type: none"> ○ Needs assessment – what if they don't have the skill (what then?) ○ 	<ul style="list-style-type: none"> ○ A section indicating that Government to embark on capacity building where there are no skills has been added to the policy
B4: Categories of Producers	Mpumalanga Department of Agriculture	<ul style="list-style-type: none"> ○ The term "Indigent" does not fit well to the description of producers in the sector 	<ul style="list-style-type: none"> ○ This was amended to refer to a lower category of producers as "Household Producers"
	Reference Group	<ul style="list-style-type: none"> ○ The definition of farmer categories need to be revisited as there a number of documents in government and academic which clearly articulate the various categories of producers. 	<ul style="list-style-type: none"> ○ Farmer categories have been discussed in detail at various platforms. However, there are many suggestions and the policy will consider what seem to be feasible for the sector.
	FruitSA	<ul style="list-style-type: none"> ○ Consistency in the terminology is needed – e.g. subsistence farmer vs household producer. The well-known and documented terminology is subsistence farmers. 	<ul style="list-style-type: none"> ○ The term "Household Producer" has been kept but the definition modified to include some of the elements of "Subsistence Producer".

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<ul style="list-style-type: none"> ○ 	
	SAPPO	<ul style="list-style-type: none"> ○ A unit is commercial when at 250 sow. A 100 sow unit is therefore considered a small-holder, though with an annual turnover of R4 million 	<ul style="list-style-type: none"> ○ There is a bit of a contradiction here with the current definition but there essence of small and large vs commercial (profit) orientation will therefore take precedence.
	SASA	<ul style="list-style-type: none"> ○ The term 'Household Producer' be renamed to Subsistence Producer. Under section 7.1.1 it is proposed that a 'voucher system to subsidize production inputs'. Rural subsistence producers often do not have the means to travel long distances to town and cities to 	<ul style="list-style-type: none"> ○ The term "Household Producer" has been kept but the definition modified to include some of the elements of "Subsistence Producer". We are of the opinion that the utilisation of an e-voucher system for inputs supply – either at agro-dealers or local centres, should be utilised.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>access agricultural input suppliers. Hence, the statement should be revised to enable other cost effective and transparent methods to be put in place to enable subsistence producers to access production inputs timeously, at local centres.</p> <ul style="list-style-type: none"> ○ SASA therefore would want the drafting team to consider the need for a sub category that makes specific reference to the support needs of co-operatives. A specific need of co-operatives is governance support in order to ensure that the entity functions as per its constitution. 	<ul style="list-style-type: none"> ○ The support requirement for cooperative is noted and has been included in the various categories. Cooperative per se is not a category but a business entity which can either be small, medium or large and its support requirements will also differ depending on the scale of operation and skills of the members.
	MINTECH	<ul style="list-style-type: none"> • The issue of categorisation needs to be looked into esp. Household Producers 	<ul style="list-style-type: none"> ○ DAF welcomes written comments on this and any section of the policy.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
B5: Policy Implementation Plan	HortGro, SATGI, SAPPO	There is a need to include private sector in the process flow for policy.	<ul style="list-style-type: none"> ○ This was included in the current draft policy
B6: Policy Implementation Mechanism	CASP QRM	<ul style="list-style-type: none"> ○ The policy needs to be clear on the role of the state and other relevant stakeholders. 	<ul style="list-style-type: none"> ○ A section which outlines the roles and responsibilities of the various stakeholders has been added in the policy.
		<ul style="list-style-type: none"> ○ Recommended that the industry representative be involved from the planning phase of the project through to the approval. The involvement of the industries will also assist with the identification of potential beneficiaries 	<ul style="list-style-type: none"> ○ Noted, this has been added in section 10 "Roles and responsibilities"
B7: Policy Interventions	Western Cape Department of Agriculture	<ul style="list-style-type: none"> ○ Indicate who must take responsibility for the various actions included in the intervention section. 	<ul style="list-style-type: none"> ○ A section which includes the roles and responsibilities of various stakeholders has been inserted.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
	FruitSA	<ul style="list-style-type: none"> ○ The level of support (capped amounts) needs to be commodity specific. Fruit farming is a long-term and capital intensive investment venture. A capital invest of R250 000 is required to establish 1 ha of fruit trees. An additional amount of R40 000 per ha per annum is required for maintenance. The trees will only start bearing fruits after 5-6 years. One will need at least 20 ha to have an economically viable fruit farm. Therefore, you will need R9.8 million to establish a 20 ha viable fruit farm over 5 years. How will the cash flow issues be addressed while waiting for the long-term crops to mature? 	<ul style="list-style-type: none"> ○ This is noted and should be taken into consideration when approving related projects for support. A bankable business plan should be able to leverage from limited state and commercially available loans through development financial institutions and commercial banks where necessary.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<ul style="list-style-type: none"> ○ The policy needs to look at the whole commodity value chain. If farmers are supported to produce a commodity, where are they going to pack it, which market will they supply to, what are the requirements of that market, Private standards and compliance issues, etc. ○ Policy needs to be clear on black empowerment (HDI), producer support is inclusive of all producers. 	<ul style="list-style-type: none"> ○ This is noted hence it is the intent of the policy to “Capacitate and support the certification of smallholder producers to meet national and international standards” ○ We concur with the proposal by FruitSA hence a policy statement that “Only land reform and private acquisition by previously disadvantaged individuals (PDIs) will be considered for government support to ensure the attainment of transformation targets”.
	SAPPO	<ul style="list-style-type: none"> ○ Recommending provision of non- 	<ul style="list-style-type: none"> ○ This is noted but as commodity specific

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>reproductive animals – Support to farmers be in a form of out-grower (Weaner provision) units than breeding units (sows & boars). Once the animals reproduce, household producers are not always able to maintain the increased number of animals and this may lead to animals being malnourished, and therefore forcing farmers to continuously seek support.</p> <ul style="list-style-type: none"> ○ Proposed R10 000 per household can only support the production inputs and not the infrastructure, indicating that the producer must provide own infrastructure or vice versa. 	<p>support, it will be dealt as such and therefore cannot be used to generalise support as it may not be relevant for other commodities.</p> <ul style="list-style-type: none"> ○ This has been revised to a maximum of R50 000 per household following consultations with commodity organisations.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
	Natural Resource Management (NRM) MINTECH Working Group	<ul style="list-style-type: none"> ○ The options proposed in the policy where still more institutional and less focus was on operational problems as identified in the problem statement. 	<ul style="list-style-type: none"> ○ A new section has been added in the policy which outlines various interventions in line with the problems/challenges identified in the problem statement.
	SASA	<ul style="list-style-type: none"> ○ The draft document (page 15) makes reference to Comprehensive Producer Development Support Pillars. Access to finance was noted under the problem statement as a key challenge. However, this has not translated into a specific intervention measure, but confined to a paragraph under section 10 of the document. ○ SASA proposes that Access to Development Finance for Production be elevated to a "Pillar". It is important to make reference to the manner in which finances 	<ul style="list-style-type: none"> ○ The Pillars relate to support intervention and thus a section on Funding Mechanism (Section 11) has been expanded to include proposal from SASA and other stakeholders.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>for agricultural production support will be made available, with government committing to an integrated model of access to a mix of loan and grant finance.</p> <ul style="list-style-type: none"> ○ Section 8 and 9 of the document proposes a series of institutional mechanisms at National, Provincial and District Level. The institutional arrangements at a District level to co-ordinate of land reform and agriculture needs rationalisation. Currently, the Department of Rural Development and Land Reform has District Land Reform Committee, District Agri-parks Management Committees. SASA urges government not to set up new structures but to consolidate all 	<ul style="list-style-type: none"> ○ This is noted with appreciation. We also concur with the proposal hence the statement in that section which states that "This implies that parallel structures of agriculture, forestry and fisheries as well as those of Rural Development and Land Reform should be merged and their mandate be expanded".

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>current structures at a District level.</p>	
	<p>CASP QRM</p>	<ul style="list-style-type: none"> ○ There is a need to revise establishment cost as the ceiling may be a hindrance to development. The CAPs should be enterprise/commodity specific. ○ There is a need to assess the enterprise and the type of support required. 	<ul style="list-style-type: none"> ○ The proposal to have a capped support on grant funding was discussed at length with various stakeholders and there has been a general consensus that it should be adopted for the CPDS except where investment is on public goods e.g. community fencing projects, investment in water reticulation for communal livestock/irrigation schemes etc. ○ While there policy makes proposals for support requirements for the various categories of producers, there is a still a need to assess enterprise specific needs which cannot be pre-empted in the policy.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<ul style="list-style-type: none"> ○ 	
	MINTECH	<ul style="list-style-type: none"> ○ Sustainable Management of NR: There should be some triggers on water. Then the answer should be "NO" ○ There maybe a need for some kind of insurance linked to production so that farmers can afford it. 	<ul style="list-style-type: none"> ○ At this stage, this is not explicitly included in the policy however it will form part of comprehensive due diligence investigations to be undertaken as part of business plan assessment. ○ A section on the provision of development financial services includes a narrative on insurance as well.
B8: Impact Theory of Change	Forestry South Africa	<ul style="list-style-type: none"> ○ The context of the Impact Theory of Change (Annexure A) should be elaborated in the policy document. 	<ul style="list-style-type: none"> ○ A section outlining the various components of the Impact Theory of Change has been included in the document.
	CASP QRM	<ul style="list-style-type: none"> ○ The focus should not be on numbers but on the impact of this policy/support interventions 	<ul style="list-style-type: none"> ○ This is noted with appreciation hence the development of an impact theory of change to check the likely impact of successful implementation of the policy.
B9. Linkages to	Reference Group,	<ul style="list-style-type: none"> ○ The Policy should review further 	<ul style="list-style-type: none"> ○ The section on "Linkages to other policies

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
other policies	Department of Water and Sanitation	the legislative framework to assess the possible impact of existing legislation on the intended objectives of the policy.	and legislations” was amended to include suggested policies.
	CASP QRM	<ul style="list-style-type: none"> ○ There is a need to make reference to Spatial Planning and Land Use Management Act (SPLUMA) 	<ul style="list-style-type: none"> ○ This has been added on section 6 of the policy “Linkages to other policies and legislations”
B10. Roles and responsibilities	SASA and CASP QRM	<ul style="list-style-type: none"> ○ SASA proposes that the policy includes a chapter that defines the role of the private sector, commodity organisations, banks and organised agriculture. The sugar industry has put in place significant resources to support black farmers, and therefore commodity organisations and their members play an important role in the provision of support services. The industry currently provides a range of services specialist 	<ul style="list-style-type: none"> ○ This comment is noted with appreciation. Section 10 of the current draft policy include the roles and responsibilities of various key stakeholders.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>extension, governance and business management support for Trusts, CPA's and Co-operatives, training and skills development, agricultural project management, and special economic services. In addition the industry has developed a mechanisation policy which has been used to guide the mechanisation needs for land reform farms under the Recapitalisation and Development Programme.</p>	
	FruitSA	<ul style="list-style-type: none"> ○ Institutional arrangements need to be clear. DRDLR receives a large portion of funding geared towards agricultural development. How will this policy regulate their allocation and that of other Departments 	<ul style="list-style-type: none"> ○ In terms of the proposed institutional arrangements, there is a need for a closer and collaborative working relations between DAFF and DRDLR.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>which are operating in the same space, e.g. Dept Social Development.</p> <ul style="list-style-type: none"> ○ Partnerships – need to be clear on the role of each partner. What role is the industry expected/required to play? 	<ul style="list-style-type: none"> ○ A new section on the roles and responsibilities of various stakeholders has been added.
	MINTECH	<ul style="list-style-type: none"> ○ Agree on collaboration though there is a need to include industry. They have to buy-in into the policy and subsequently its implementation 	<ul style="list-style-type: none"> ○ A new section on the roles and responsibilities of various stakeholders (including Industry) has been added.
B11 Transversal Policy Measures	FruitSA	<ul style="list-style-type: none"> ○ Capacity development aspects: using this policy instrument, can the Department partner with the Universities or College of Agriculture and support graduate to start their own 	<ul style="list-style-type: none"> ○ The participation of youth in agriculture is very important. This comment has been added to Transversal Policy Measures that focuses on measures to attract youth in agriculture, forestry and fisheries.

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		enterprises?	
B12 Policy Review	MINTECH	<ul style="list-style-type: none"> ○ Build-in two to three years review of percentages so that they can be adjusted to suit provincial needs 	<ul style="list-style-type: none"> ○ This has now been included in the policy.
Narrow definition of problem statement	Study Group	<ul style="list-style-type: none"> ○ The challenge is not only the issue of enacting harmonised rules, but how those rules enable ecological sustainability and are seen as legitimate and can thus be potentially adhered and advanced by other stakeholders. 	<ul style="list-style-type: none"> ○ The matter is addressed through a section on natural resource management that promotes climate smart agricultural practices which come in the form of incentives for producers.
Innovative Finance Mechanisms		<ul style="list-style-type: none"> ○ The improvement of government financing is not a silver bullet alone. The policy should articulate the role of a broad state development support package of financial 	<ul style="list-style-type: none"> ○ The policy has dedicated sections addressing support measures that include both financial and non-financial support packages. Innovative financing models (i.e. blended financial support) will be adopted using both loans and grant funding

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>and non-financial goods and services (such as technical support, regulatory, tax incentives etc.), while entrenching a set of ethos and values which will sustain and promote investment into the sector.</p>	<p>based on bankable business plans.</p>
<p>Disjuncture between the Problem Statement and Objectives as well as policy actions</p>		<ul style="list-style-type: none"> ○ The Proposed Policy Actions emerge out of a broad clustering and characterization of what constitutes the key problems for the sector, these Policy Actions do not address the essence of problems or identify and address the root-causes of the problems. It is proposed that a broader, but incisive articulation and interpretation of the main 	<ul style="list-style-type: none"> ○ The policy problem statements have been categorised however the narrative clearly articulates the structural root causes. For instance there are existing sector policies which articulate the root causes in the sector e.g. National Policy on Extension and Advisory Services. Hence the NPCPDS does not go into such detail. ○ The policy addresses policy objectives by introducing policy proposals/

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>problem facing the sector</p>	<p>intervention measures to respond directly to each problem highlighted.</p>
<p>Policy Principles are not new</p>		<ul style="list-style-type: none"> ○ The key observations in this regard are that the policy does not necessarily clarify, whether to what extent are the current “guiding principles” are currently being carried out by the government in its current support programmes. ○ How the government seeks to do things differently 	<ul style="list-style-type: none"> ○ Some of the Principles were adopted from existing programmes and as inputs from the stakeholder consultations given their importance in policy implementation. ○ The new policy principles included mandatory producer registration, capped support, value chain approach and exit strategies all which introduce new conditions to producer support. ○ The principles further address compliance to set regulations in the sector such as CARA and labour and Tax regulations
<p>Support Packages</p>		<ul style="list-style-type: none"> ○ There is need for clear 	<ul style="list-style-type: none"> ○ The policy categorises producers and

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
		<p>delineation between support directed at economic goals and social upliftment – current approaches tend to cloud the two and this leads to inefficiencies.</p> <ul style="list-style-type: none"> ○ It is proposed that support should be relatively comprehensive and informed by a customized needs assessment of producer 	<p>introduces ring fenced funds for each producer group. The types of support are also defined. Further the policy introduces social support in the form of catering for Households Producers (Vulnerable). The support for these producers is mainly of social upliftment whilst the Smallholder and Medium Scale commercial producer categories are directed at economic objectives.</p> <ul style="list-style-type: none"> ○ From an economic perspective the policy introduced support measures based on factual agricultural economic studies done on various commodities. Hence funding is based on bankable business plans for Smallholder and Medium Scale commercial producers.
Need for a Skills		<ul style="list-style-type: none"> ○ There is still low skills of farm 	<ul style="list-style-type: none"> ○ This is acknowledged and thus the

Issue / Section	Affected stakeholders/ Concerned stakeholders	What <u>amendments</u> do they propose	Have these amendments been <u>incorporated</u> in your proposal
Assessment		management among beneficiaries	<p>policy proposes that a skills audit be done which will inform the skills gaps to be addressed for producers.</p> <ul style="list-style-type: none"> ○ The policy proposes capacity development in various fields such as record keeping and financial literacy.
Producer Definitions are unclear		<ul style="list-style-type: none"> ○ Need for a clear definition and profile of a 'producer' (i.e. not everyone is farmer) and this should be internalized by stakeholders. 	<ul style="list-style-type: none"> ○ Producers are categorised using annual turnover as a proxy. The definitions are provided which also incorporate recommendations from Operation Phakisa Producer Support-Work Stream. ○ Extensive consultations in this regard were made including the establishment of a Special Task Team which included The DRDLR and PDAs.

6. CONCLUSIONS

This consultative report outlines the approaches used for conducting consultations for the Policy on Comprehensive Producer Development Support since inception till end of December 2017. As a third consultative report, it highlighted key issues raised by various groups of stakeholders to be considered by the Policy Drafting Team.

In summary, the report shows that stakeholders were interested in both the editorial and technical parts of the policy. However, there have been few written comments received so far particularly from commodity organisations. It is however anticipated that there will be an increase in written comments during the broader stakeholder consultative process after the policy has been gazetted.