



Policy Brief for Parliamentarians

Why the NFSA Will Not Ensure Nutrition Security

The National Food Security Bill (NFSB) was introduced in Parliament in December 2011. Although the Bill begins with the lofty ideal “to provide for food and nutritional security in human life cycle approach”, the current draft betrays a poor understanding of nutrition security and falls far short of effectively addressing the problems of hunger and malnutrition, which are widely prevalent across the country.

Food security has three aspects to it – availability, access and absorption. This Bill only partially addresses the ‘access’ aspect of food security, while completely ignoring ‘availability’ and ‘absorption’. Hence, the Bill, if at all any, can be expected to have only a very limited impact on nutrition security.

Ten Reasons Why the NFSB will not Ensure Nutrition Security

1. LIVELIHOODS FOR ACCESS

People’s access to food and nutrition is intrinsically related to people’s livelihoods. Sufficient

and sustained income is necessary for households to get access to adequate and good quality foods. Figures show that about 40% of the population (in 2004-05) is below the poverty line. If this poverty line is slightly increased, then a much higher proportion of people can be considered vulnerable. The National Commission for Employment in Unorganised Sector (NCEUS) set up by the Government of India, in its report found that 77% of the population is vulnerable as they are living on a per capita expenditure of less than Rs. 20 per day (at 2004-05 prices). Recent results from the NSS also show that the country’s growth experience has not resulted in a commensurate increase in employment opportunities, with many economists labelling the last decade as one of ‘jobless growth’. Such widespread poverty and lack of employment opportunities obviously has an impact on food security and purchasing power.

In this context, the NFSB would have to be linked to a wide range of issues such as access to land, water and forest, access to decent employment and so on. The present Bill focuses on food alone and fails to

The 3 As of Food Security

Availability is the physical availability of food stocks in desired quantities, which is a function of domestic production, changes in stocks and imports as well as the distribution of food across territories.

Access is determined by the bundle of entitlements, i.e., related to people's initial endowments they can acquire (especially in terms of physical and economic access to food) and the opportunities open to them to achieve entitlement sets with enough food either through their own endeavours or through State intervention or both.

Absorption is defined as the ability to biologically utilise the food consumed. This is in turn, related to several factors such as nutrition knowledge and practices, stable and sanitary physical and environmental conditions for effective biological absorption of food and health status.

Source: MSSRF and WFP (2008)

place the issue of food security in the larger context of conditions of living.

2. THERE CAN BE NO FOOD WITHOUT AGRICULTURE

Agriculture is linked to nutrition and food security through many pathways. As mentioned above availability of food is central to any understanding of food security and this is intrinsically linked to the state of agriculture. Secondly, agriculture is also a source of income either through wages earned by agriculture workers or by profits earned by selling one's produce. In India, the agriculture sector employs nearly 58% of the total Indian workforce and generates more than 55% of the rural income, and so the potential of agriculture to influence nutrition is large. Thirdly, there is a link between agricultural policy and food prices which also affects nutrition. Food prices affect the incomes of net sellers and the ability to ensure household food security (including diet quality) of net buyers. Fourthly, income derived from agriculture and how it is actually spent has an impact on nutrition, especially the degree to which non-food expenditures are allocated to nutrition-relevant activities (for example, expenditures for health, education, and social welfare).

More than 80% of rural women engaged in the labour force work in the agriculture sector. This provides a significant opportunity to reveal the gender dimensions of agriculture-nutrition linkages. The resources and income that women command by engaging in agriculture carries special significance for nutrition, especially among children. Women have consistently been found more likely than men to invest in their children's health and well-being, and the income and resources that women control wield disproportionately strong effects on health and nutrition outcomes generally.

A focus on agriculture is therefore important, both to ensure availability of foodgrains and as a route to improving incomes of a large section of the population whose primary source of employment is in agriculture. The present Bill makes a mention of agriculture only in Schedule III, under 'Provisions for Advancing Food Security'. This Schedule only provides for what Governments shall "*strive to progressively realise*" (Section 39). Even to make the PDS function, steps for improved procurement and storage need to be included in the Bill. There is a need

to at least introduce guaranteed Minimum Support Prices and decentralized procurement mechanisms as part of the NFSB.

3. TARGETTING RESULTS IN EXCLUSION ERRORS

The Bill provides for the entitlements under the Targeted Public Distribution System wherein all individuals will receive a different quantity of foodgrains, with those belonging to general category getting 3 kgs per month and those in the priority category getting 7 kgs per month. Further, 25% of the rural population and 50% of the urban population are to be excluded from PDS benefits. There are several problems with such a formulation.

The Bill stipulates: "*Provided that not less than forty-six per cent of the rural and twenty-eight per cent of the urban population shall be designated as priority households.*" It is obvious that these figures are derived from the rural and urban poverty ratios based on the poverty lines recommended by the Tendulkar Committee for 2004-05. Therefore, what is proposed in the Bill is a continuation of the system of targeting entitlements based on the "BPL approach" albeit with a different nomenclature (*Priority* and *General* instead of *APL* and *BPL*). Moreover, a new category of "excluded" is also being created.

Experience has shown that targeting based on the BPL list (with BPL cardholders *only* having legally binding PDS entitlements) is both unreliable and divisive. The lack of reliability of the BPL list is evident from at least *three* national household surveys, all showing that about half of all poor households in rural areas do *not* have a BPL card. These are National Sample Survey (61st Round, 2004-05), Third National Family Health Survey 2005-06, and Indian Human Development Survey. In states like Bihar and Jharkhand, the proportion of poor households (below the "Tendulkar poverty line") that did *not* have a BPL card was as high as 80% in 2004-05, according to National Sample Survey.

The PDS entitlements must therefore be universally provided without differentiating between different people based on poverty ratios.

4. PROVISION FOR RICE AND WHEAT ONLY

The Bill defines "Foodgrains" to mean "rice,

wheat or coarse grains or a combination thereof". However, nutritional security requires along with cereals, at the very least pulses and oils as the common sources of protein and fat. NSS data shows that the average pulse consumption among people has decreased between 2004-05 and 2009-10. A similar trend is observed in the case of millets and coarse cereals as well. The Bill must therefore include provision of pulses and oils through the PDS and lay a stronger focus on encouraging the use of millets not just through the PDS but also through other food distribution programmes such as the mid day meal scheme and ICDS.

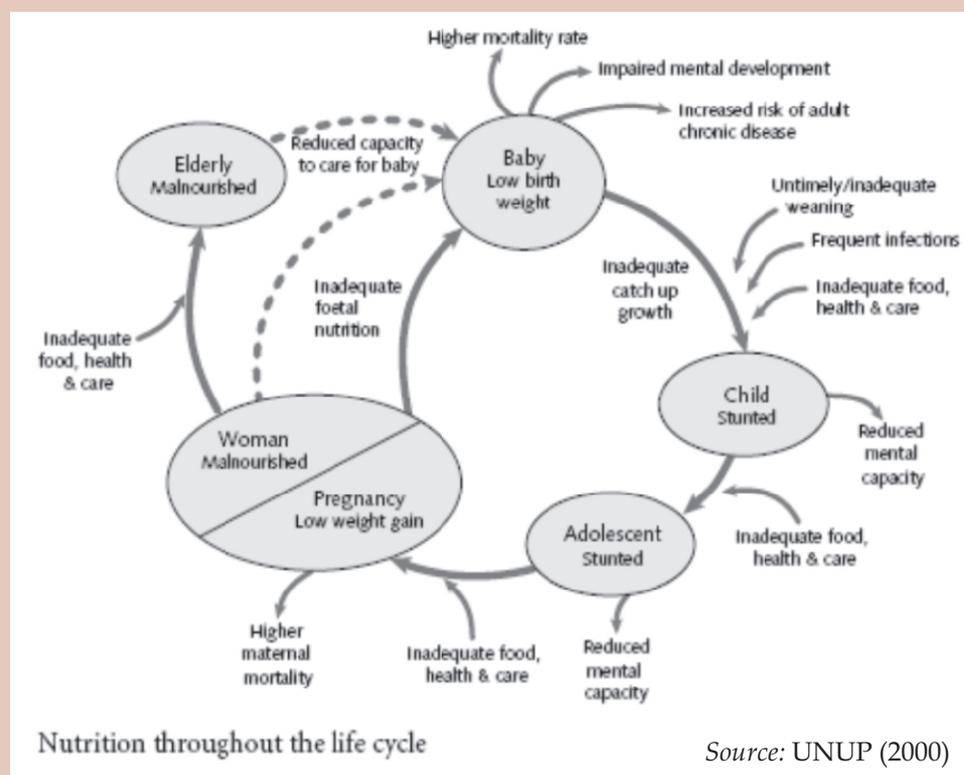
This could go a long way in improving the nutrition content of people's diets. Millets are a rich source of nutrients, for e.g. while pearl millet (Bajra) has 16 mg of iron, rice has only 0.7 mg; and finger millet (Ragi) offers 344 mg of calcium while rice has 10 mg. Further, these foods are predominantly from dryland crops, which need fewer resources for cultivation and are the mainstay of sustainable production system in the vast rainfed areas. To improve protein consumption along with provision of pulses through the PDS, inclusion of animal proteins such as milk and eggs in the nutrition provided to children through schools and anganwadis must be considered.

The Bill in its present form with provisions only for cereals (and that too, mainly rice and wheat) is therefore unlikely to contribute much towards nutrition security and many more provisions need to be included.

5. MISSING LINKS - ADOLESCENT GIRLS

While the Bill states that it aims to provide food and nutrition security in a human life cycle approach, a crucial age group, namely adolescence is completely ignored. Ensuring good nutrition for adolescent girls is a critical linkage in breaking the inter-generational

cycle of malnutrition. Malnutrition often begins at conception. Malnourished women are more likely to give birth to smaller babies who then tend to be malnourished themselves. The effects of early childhood malnutrition persist into the school years and even adulthood, lowering productivity and quality of life. Small adult women who were malnourished as children are more likely to produce small babies, and the cycle of malnutrition and illnesses continues. Intervening during adolescence can go a long way in ensuring healthy pregnancies and decreasing the incidence of low weight babies at birth.



Supplementary nutrition (for girls in school, this can be through the school mid day meals being extended up to class XII and provision of supplementary nutrition for adolescent girls through ICDS) and health counselling for both the girls and their families are must be ensured. All of these interventions can be carried out by the ICDS, school and health departments in convergence with panchayats. Even the Supreme Court orders under the 'Right to Food' case provide for universal supplementary nutrition for adolescent girls through the ICDS.

While the current Bill provides for mid day meals for school children (only up to class VIII), nutrition support for adolescent girls is only mentioned in the Schedule on provisions for progressive realisation.

6. NEGLECT OF YOUNG CHILDREN

There are several reasons for children, especially young children, to have a special claim under the NFSB. India has intolerable levels of child undernutrition, which impairs the daily lives of millions of girls and boys. Further, research on nutrition has unambiguously shown that it is in childhood (and especially in the age group of 0-2 years) that nutritional interventions are most required to ensure adequate growth, cognitive development and good health. The age group of 0-2 years is seen as the 'window of opportunity' for interventions aimed at reducing malnutrition. In terms of the proposed Act, this would imply strengthening the Mid Day Meal Scheme and the Integrated Child Development Services (ICDS), especially services for children in the 0-2 age group and including in it special services which provide nutrition counselling, breastfeeding support, crèches and maternity entitlements for women to facilitate care and breastfeeding.

However, the NFSB only focuses on provision of additional meals to children and pregnant and lactating mothers. This is once again contrary to the Supreme Court directives that clearly specify that *all* services of the ICDS must be universalised. ICDS services include nutrition and health education, growth monitoring, referral services, immunisation and preschool education along with provision of supplementary nutrition. Further, several studies and evaluations, including by the Government of India have shown that infrastructure of the ICDS is very poor and there is a need to improve the physical infrastructure of the anganwadis, and enhance the number of workers and their quality of training for ensuring better focus on children under two years of age. The NFSB must therefore make provisions for 'universalisation with quality' of the ICDS rather than just providing supplementary meals as it currently does.

Further, experience has also shown that proper childcare (in the form of 'crèches') can contribute to preventing malnutrition. Ninety percent of women in our country work in the informal sector with no proper place to leave their young children. Often young children are left in the care of older girls, to the detriment of the latter's right to education. Crèches (for all those who need it) must be considered a part of comprehensive services for young children. Crèches have not been mentioned in the NFSB, not even in the Schedule (Schedule III) on objectives for progressive realisation.

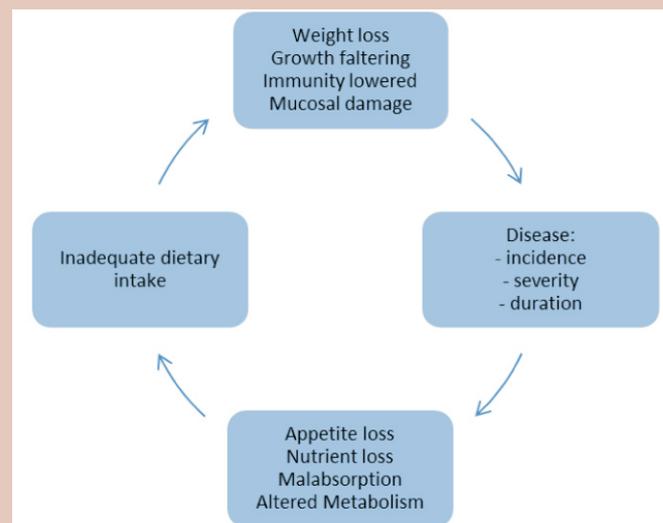
7. NO PROVISION FOR TREATMENT OF MALNUTRITION

NFHS data shows that about 20% of children under five are severely malnourished. The only provision for severely malnourished children in the current Bill is provision of an additional meal. Treatment of malnutrition requires a range of interventions including early identification, healthcare, improved nutrition and intensive nutrition counselling for the family. The NAC (?) draft provides for detailed interventions for the management of malnutrition and this must be incorporated in the Bill. Otherwise, the current Bill will not even help in treating those children who are already severely malnourished with the risk of mortality.

8. HEALTH SERVICES - INFECTION AND MALNUTRITION

Inadequate nutrition intake and illness form a vicious circle. A malnourished child, whose resistance to illness is compromised, falls ill, and malnourishment worsens. Children who enter this malnutrition-infection cycle can quickly fall into a potentially fatal spiral as one condition feeds the other.

Malnutrition lowers the body's ability to resist infection by undermining the functioning of the main immune-response mechanisms. This leads to longer, more severe and more frequent spells of illness. Infections cause loss of appetite, malabsorption and metabolic and behavioural changes. These, in turn, increase the body's requirement for nutrients, which



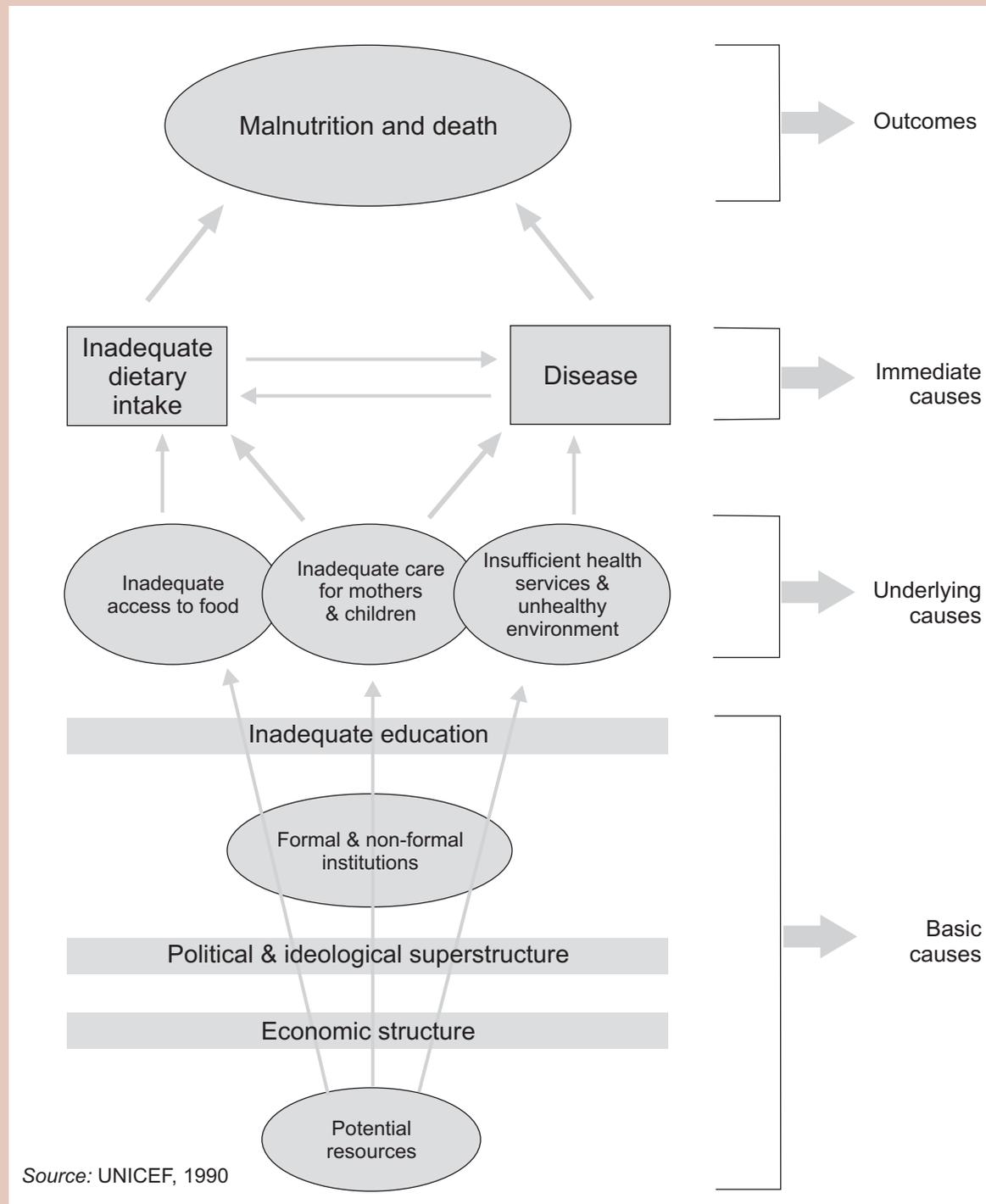
Source: UNICEF (1998)

further affects young children's eating patterns and how they are cared for.

It is therefore important that proper and timely care for sick children is provided for. The Bill must include a provision for identification of sick children and their referral to health services. As mentioned above the linkage with health services is also important for treatment of severe malnutrition.

9. ACCESS TO CLEAN WATER

Prevention of illness is also an essential intervention for prevention and management of malnutrition. Many of the illnesses caused during childhood (which contributes to malnutrition) such as diarrhoea are caused by inadequate access to clean drinking water. Studies have also shown that proper washing of hands is one of the basic



UNICEF, 1990. Conceptual framework in 'Strategy for Improved Nutrition of Children and Women in Developing Countries'. Monograph, June 1990. Programme Division, Nutrition Section, New York.

interventions for prevention of malnutrition. Access to clean water is therefore essential to address nutrition security.

10. SANITATION

As with the case of clean water, sanitation facilities are required for prevention of illness and hence malnutrition. The present Bill mentions drinking water, sanitation and health services in the Schedule on 'Provisions for Advancing Food Security' but does not provide for specific entitlements for the same.

Conclusion

As seen above, for various reasons, the present version of the NFSB does not address nutrition security. Given the high rate of malnutrition in our country, a strong case can be made for urgently introducing comprehensive services to address the problem. This Bill could be seen as an opportunity to lay the framework for our fight against malnutrition.

However, the present Bill is nowhere close to addressing the problem of malnutrition, leave alone ensuring nutrition security. Even if it is accepted that the aim of the Bill is less ambitious and is only to address immediate hunger, it falls short on many counts.

References

MSSRF and WFP (2008), *Report on the State of Food Insecurity in Rural India*, M. S. Swaminathan Research Foundation, Chennai.

National Advisory Council's Draft National Food Security Bill, Explanatory Note and Framework Note.

Reetika Khera (2009), 'Right to Food Act: Beyond Cheap Promises', *Economic and Political Weekly*, Vol. XLIV No. 29, July 18.

Right to Food Campaign (2010), 'National Food Security Act: An introductory primer on the Legal Guarantees Demanded by the Right to Food Campaign'.

Right to Food Campaign's Documents available on www.righttofoodindia.org.

Suneetha Kadiyala, P K Joshi, S Mahendra Dev, T Nanda Kumar, Vijay Vyas (2012), 'A Nutrition Secure India: Role of Agriculture', *Economic and Political Weekly*, February 25, Vol. XLVII No. 8.

Stuart Gillespie and Suneetha Kadiyala (2011), 'Exploring the Agriculture-Nutrition Disconnect in India', Conference on Leveraging Agriculture for Improving Nutrition and Health, Conference Brief No. 20, IFPRI.

UNICEF, 1990. Conceptual framework in 'Strategy for Improved Nutrition of Children and Women in Developing Countries'. Monograph, June 1990. Programme Division, Nutrition Section, New York.

UNICEF (1998) State of World's Children.

UNUP (2000) Food and Nutrition Bulletin - Ending Malnutrition by 2020: An Agenda for Change in the Millennium.

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