#### How to Cite:

Lalengkima, L., & Singh, K. G. (2022). Execution issues with FPO policy's operational guidelines. *International Journal of Health Sciences*, 6(S1), 5221–5235. https://doi.org/10.53730/ijhs.v6nS1.6046

# Execution issues with FPO policy's operational guidelines

# Lalengkima

Research Scholar (Economics), NIT Mizoram

Email: engkima123@gmail.com

# Konthoujam Gyanendra Singh

Associate Professor (Economics), NIT Mizoram

Email: gyanendra.hss@nitmz.ac.in

Abstract--- A majority of public policy assessments focus on either policy formulation or ex-post implementation evaluation, leaving the policymaking black box untouched. Stakeholder engagement on the nitty-gritty specifics of guidelines is also essential for improved policy execution. The current situations affect policy-making consultations and may result in low stakeholder buy-in. The operational principles for supporting 10,000 Farmer Producer Organizations (FPOs) by further 2 years are highlighted in this article, which is an innovation of a recent significant policy document in Indian agriculture. Through a detailed e-survey, key stakeholders, representatives from FPOs and their federations, sponsoring and training organisations, donors, and other ecosystem players with significant experience working with FPOs were invited to participate and express their views on the policy document. The report includes e-survey findings that reveal a high level of participation and enthusiasm for the new policy. In the new programme, there is a clear endorsement of the long-term goal, as well as milestone-based assistance and improved financial arrangements. However, respondents expressed reservations about the "One District, One Product" blueprint and the proposed new institutional architecture's grassroots implementation capacity, as well as the overall role of the National Project Management Agency (NPMA) and its ability to roll out a diverse portfolio through implementing agencies and Community Based Business Organizations (CBBOs). Respondents were also surprised by the lack of policy support for the large number of FPOs that have sprung up in recent years; they appear to have been left on their own despite significant efforts in social mobilisation and incubating member-owned collective enterprises for growth and sustainability.

**Keywords---**Farmer Producer Organizations, One District, One Product, federations, sponsoring, e-survey.

#### Introduction

Farmers-Producers Organization (FPO) is a term that encompasses all farmers-producers organisations that have been incorporated/registered either under Part IXA of the Companies Act or under the Co-operative Societies Act of the relevant States. For this scheme, FPOs registered under the Cooperative Societies Act of the State (including the Mutually Aided or Self-reliant Cooperative Societies Act, by whatever name it is called) must be protected from all forms of interference, including during the electoral procedure and on a daily basis, by provisions in their Memorandum of Association and Bye-laws, in order to promote healthy growth and development of FPOs.

## Being aware of the pandemic's policy implementation

The major agricultural reform measures in India have been hotly debated, there has been little discussion of new sorts of institutions that are likely to drive the agrarian transformation. It is in the technical prescription, the nuts and bolts of operational rules that policy presents itself, even if a policy paper is sometimes used to signify political goals - "the 1991 moment in agriculture" or elsewhere. In many cases, there are discrepancies between the stated goals of policy and the actual results (OToole, 2000). According to a wide range of external elements and settings, policy papers are translated in different ways on the ground. The success or failure of a policy is not based just on its merits or design; rather, it is dependent on how it is implemented. It is essential to maintain regular contact with and understand the viewpoint of the implementing authorities in order to ensure efficient implementation (Hudson, 2019). Instead of looking for a one-size-fits-all policy solution, study into the policymaking process might lead to regionally and contextually relevant improvements.

For policies with diverse and tangled aims and long-term goals like a paradigm change, this is especially true when looking at Farmer Producer Organizations as crucial, if not essential, vehicles for Doubling Farm Income. The policy guidelines for establishing FPOs include a number of operational and technical criteria. As a result, these rules will have an influence on a wide range of stakeholders, necessitating the support of many. Consequently, it is critical to foresee potential implementation challenges and incorporate possible institutional structures to support policy and integrate course adjustments. Binary categories and agreement levels fail to capture the full variety of policy-related issues and perspectives from stakeholders and organisations. The Indian government recently announced plans to promote 10,000 Farmer Producer Organizations (FPOs) by 2024. The operating guidelines were published in July 2020 and included substantial revisions to the membership requirements, agency selection, incubation assistance, and grant administration processes. Prior to their fast proliferation in 2016-2019, FPOs had their last thorough set of rules in 2013. Nonetheless, the continuous spread of Covid-19 and the accompanying lockdowns in much of India affected talks on the numerous elements of the widely

anticipated 10,000 FPO policy issued in July 2020. In order to gather a wide range of viewpoints, a detailed questionnaire was created (Chambers, 2015). Instead of developing a bias from one stakeholder's perspective, the regional and role diversity of responses was sought. This method complicated the plot but revealed the restrictions and tensions driving the dialogue. To avoid simple and reductive 'answers,' the exercise attempted to highlight the 'messy realities' (Cook, 2009)regulating the respondents' opinions. It also assisted policymakers articulate their beliefs about targeted beneficiaries (FPOs, farmers, etc.) and their implied expectations from supporting organisations. With these insights, stakeholders may collaborate more effectively and create common ground for future encounters. Deliberative democratic dialogues can boost representative procedures during pandemics and this research proposes a policy conversation innovation with many stakeholders (Pieczka, 2010).

#### Supporting ecosystems for FPOs for increased farm income

The Centre's "Formation and Promotion of Farmer Producer Organizations (FPOs)" initiative aims to create 10,000 new FPOs in five years. Its major goal is to provide professional and financial support to newly founded FPOs for five years. Each FPO may also be eligible for equity of Rs.15 lakh and credit of Rs.18 lakh if certain quality standards are met. The scheme's main goals are as follows:

- Encourage the formation of 10,000 new FPOs by providing a holistic and broad-based supportive ecosystem.
- To improve productivity and profitability through greater liquidity and market connections.
- Up to five years of handholding and assistance for new FPOs in all elements of management, inputs, production, processing, value addition, market connections, credit linkages, and technology usage.
- Providing effective capacity building to FPOs in agro entrepreneurship so they may become commercially successful and self-sufficient after government support.

The recommendations set the ground for evidence-based policy conversations with major implementing agencies including NABARD and SFAC (Small Farmers' Agri-Business Consortium). The operating guidelines were divided into 17 sections, and e-survey respondents were advised to read them first. Rural Livelihood groups, Revitalising Rainfed Areas Network (RRAN), National Rural Agrarian Society (NRAS) and other agricultural networks shared the survey form, which was implemented in partnership with the National Association of Farmer Producer Organizations (NAFPO). A trust network prevailed, allowing members to express themselves freely. A total of 54 people responded to the 14 questions with 37 sub-parts addressing various facets of the operating guidelines. The replies were recorded and categorised. An easy and adaptable tool for qualitative data analysis, Themes were mapped into replies based on FPO criteria categories. Feedback on certain guidelines received descriptive replies. The next section provides an in-depth study of the replies.

# Data Analysis Diversity of Participants

More than half of the responders (54+2) came from diverse parts of India, while one came from outside the country. Figure 1 shows that South India (32 percent) had the most participants, followed by Western India (20 percent) and Eastern India (10 percent) (16 percent). Some of the responding organisations have a presence in many Indian states (12 percent). Figure 2 depicts the respondents' work environments, including their affiliations with FPOs and federations, as well as other educational and training establishments (some respondents belonged to multiple categories). More than two-thirds of the responders were FPO promoters and trainers, followed by FPOs and federations (16), donor organisations (seven), and value chain actors (six). More than 39 percent of the respondents have worked with farmers and their organisations for more than ten years.

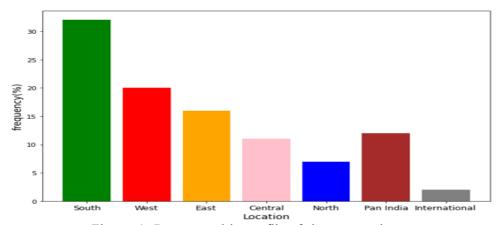


Figure 1: Demographic profile of the respondents

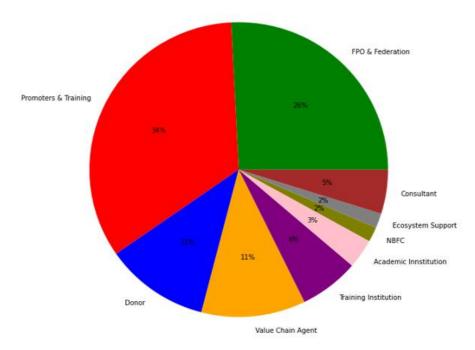


Figure 2: Organizational profile of the Respondents

In general, the questions focused on the guidelines' most important sections. On the basis of their suitability, respondents were invited to give comments that they thought would enhance the proposed FPOs. As a whole, the replies can be categorized as follows:

### Cluster- based business organizations (CBBOs)

FPOs shall be formed and promoted by Cluster-Based Business Organizations (CBBOs) at the State/Cluster level as required by Implementing Agencies; nevertheless, Project Management Advisory and Fund Sanctioning Committees will designate goals for the State or region's producing clusters (N-PMAFSC). FPOs shall be formed and promoted by Cluster-Based Business Organizations (CBBOs) at the State/Cluster level as required by Implementing Agencies; nevertheless, Project Management Advisory and Fund Sanctioning Committees will designate goals for the State or region's producing clusters (N-PMAFSC).

The idea of forming and managing FPOs with participation from Cluster-Based Business Organizations (CBBOs) was met with mixed reactions. Nearly 30% disagreed with the provision, and 40% thought it needed further elaboration. The Centre's emphasis on commodity-based FPOs (One District One Product) sparked concerns, claiming farming and demand trends are complicated, and standards must accommodate flexibility. Many respondents expressed worry that a single-product concentration would lead to monoculture programmes, hindering mixed-crop producers employing agroecological principles. This issue calls for redefining CBBOs' role and scope. Concerns were raised about the faith in KVKs (Krishi Vigyan Kendras) and agricultural universities as weapons and automatic CBBO

candidates. Historically, these institutions have had a limited role in market interaction or company development. Many respondents suggested that cluster selection should actively promote farmer collaboration, shared natural resource use, and cultural sensitivity.

### FPO membership requirements

The minimum number of members required to create an FPO has been reduced from 1000 to 300 in plain regions and 100 in the hills after the 2013 recommendations (GoI, 2013). Given the severe geography and small population, most respondents (58%) believed this minimum condition for FPO development was possible. Unease that the present definition of a hilly region (1000m MSL or higher) will exclude most populations in the eastern ghats and central tribal territories. Some argue that the FPOs should serve a bigger population, up to 4,000-5,000 families, and that the threshold is set too low for these institutions to support small farms. One advocated for flexibility based on local socio-economic and geographic considerations.

FPO federation level: "federate at district level and State level depending on their necessity of processing, branding and marketing of produce/trading of commodities, which are vital for scaling up for survivability and expansion in an era of competition. Participants were asked to select the degree of federation they would most want to see. District federations were preferred by 54 percent, while 44 percent favoured the state-level federation option.

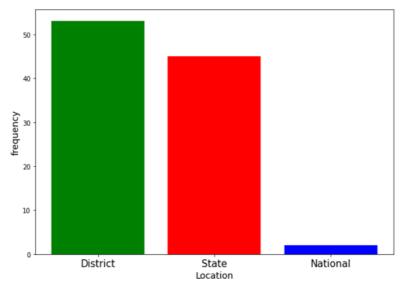


Figure 3: Preference distribution of the level at which FPOs can be federated

In aspirational districts, efforts are being made to establish one FPO every block: The centre aims to "form & promote at least 15% of the total planned 10,000 FPOs (i.e. 1,500 FPOs) in aspirational districts with at least one FPO in each block of aspirational districts in the country for their development" (p.4). Question: Will this move assist spread FPOs and expand access to farmers? Most

respondents agreed that value chains and other infrastructure assistance may help develop sustainable FPOs at the block level. Others expressed worry over operational issues and the FPO's block-level coverage. One participant suggested reducing the number to 10%, while another suggested allocating 10% to promote women-led FPOs.

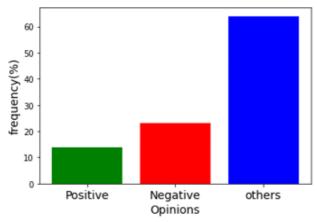


Figure 4: Views on- if having an FPO at block level in aspirational districts would address access issues

#### The new institutional architecture

The former policy architecture supported farmers through several entities with varying standards and support. The new strategy intends to unite them under a single National Project Management Agency (NPMA). The policy includes a State Level Consultant Committee (SLCC) and a District Level Monitoring Committee (DLCMC). Respondents were asked to consider the bodies' design, composition, and potential efficacy.

National Project Management Agency (NPMA): SFAC will transparently establish a National Project Management Agency (NPMA) to provide overall project direction, data maintenance via an integrated portal, and information management and monitoring. Incubation Service Providers, IT/MIS, Law & Accounting, and Agriculture/Horticulture. The NPMA will have a technical team with five categories of specialisation.

## **Duties and responsibilities of NPMA**

- Creating the program's outlines, including cluster structuring
- Selection of CBBOs with Transaction Advisory
- Post-transaction assistance is required for successful project/program execution.
- Assist in the establishment of a structured interaction with stakeholders such as ministries, financial institutions, training institutions, and research and development institutions.
- Assisting in the development of programme and policy orientations
- At the national and state levels, policy orientation and related advocacy

Adequacy of the NPMA's mission and scope: The centre intends to establish a National Project Management Agency (NPMA) to oversee national projects, data upkeep and information management. NPMA will be expected to assist CBBOs with project implementation, stakeholder engagement, and programme and policy direction. Participants were asked if they believed this was adequate or if they had other ideas about how such a body might work. While over half of participants agreed that the NPMA's job was well-defined, others felt it was too broad for one agency. Others said more regional centres may assist improve monitoring and support. Some questioned the top-down hierarchical nature of job distribution, which lacks the reflexivity of decentralised institutions. Recruitment and appointment practises were also questioned as inconsistent.

NPMA's credit guarantee programme and advising services were offered to FPOs. While 48% of respondents thought it was a good idea, others (27%) said more information was needed about the NPMA's purpose and scope. 25% said the instruction was inadequate and demanded further action. Their key worries were the lack of defined criteria for helping current FPOs, financing details, and if the NPMA advice services were free.

Adequacy and responsibilities of the Implementing Agencies: Three implementing agencies have been recommended by the government (IAs). FPOs are already being promoted by SFAC and NABARD, and the National Cooperative Development Cooperation (NCDC) has jumped on board as well. The instructions specifically specify that:

- SFAC will develop and promote FPOs under Part IX A of the Companies Act.
- NCDC will create and promote FPOs registered under the State Cooperative Societies Acts.
- NABARD shall create and promote FPOs registered under Part IX A of the Companies Act or any State Co-operative Societies Act.

States may also approach the DAC&FW to establish a state-level implementing agency. NAFED (National Agricultural Cooperative Marketing Federation of India Ltd.) has been tasked with promoting 50 FPOs in 2020-21. Assisting cooperative societies and FPCs in connecting to markets for their agricultural products and inputs, NAFED recently took over the national-level Federation of Indian FPOs and Aggregators (FIFA).

If this was not adequate, respondents were asked for comments on the IAs' duties and responsibilities. Most respondents agreed that the IA proposal should include new concerns and lessons learned from prior programmes. Some believe that before assisting FPOs, CBBO capacity must first be built. Others proposed clarifying the role of IAs in assisting FPOs and CBBOs with marketing, value addition, price realisation, and agricultural extension. Some pointed out that the nature of the collaboration between the three primary agencies was not specified. There's been some discussion over SFAC promoting secondary FPOs while NABARD/state governments/NCDC push primary FPOs. Others advised integrating more experienced grassroots agencies like SRLMs and CSOs (CSOs).

#### **Duties and Responsibilities of CBBOs**

- Assist in the execution of the NPMA's programme and Scheme guidelines.
- Help the Implementing Agency find clusters.
- Prepare baseline survey, clusters, value chain research, groups and FPO meetings. They may seek support from Local Bodies in locating appropriate produce clusters and mobilising members.
- BODs are trained on duties, responsibilities, management, as well as capital/equity mobilisation.
- Identification of training needs, development of training modules, basic training workshops and exposure tours.
- Encourage social cohesion among FPO members.

Adequacy of the criteria for identifying CBBOs: Only 19 participants thought the requirements were sufficient. The general consensus was that the requirements were not straightforward or comprehensive enough to encourage the development of financially sound CBBOs. Instead of just covering state and central government agri-universities and KVKs, several respondents suggested that the qualifying requirements for CBBOs should be expanded to institutions registered as societies, public charity trusts, or Section 8 businesses. This idea addressed CBBOs' worries, since they are experienced in service or development but lack the experience needed to sustain a firm. Others believed that the requirements should be based on previous POPI-building experience, and that government entities should not be nominated by default unless they meet the criteria set forth for everyone else.

The timescale suggested for supporting CBBOs' financial independence is feasible: Only 28 individuals thought the timing was reasonable and sufficient. While some people applauded the idea of holding CBBOs accountable, others believed that the responsibility for meeting stated targets should be shared by the IAs as well. Others emphasised the necessity for businesses in their early phases to be flexible and responsive to changing circumstances. It was also advised that more money be put in, especially in the first year.

Adequacy of three-tiered implementation mechanism at National, State and District level: The guidelines envision a well-structured and institutionalised three-tiered system at national, state, and district levels. Those polled were asked to remark on the precise guidelines for each level. The main points were as follows:

# National level

- CSO engagement is essential because they are more grounded, purposedriven, and inclusive of people of all classes and genders.
- Active engagement of practitioners should be encouraged instead of cooption tactics.
- There should be a wide basis, with representatives from the NDDB, IRMA, and other well-known civil society organisations.

#### State level

- Because state government departments are understaffed and hence unable to handle increased obligations, CSO specialists must be given priority. A more effective technique than bureaucracy is needed to align diverse line departments.
- Existing high-performing FPOs in the state should be required to submit nominations. Farmers and FPO professionals might be among them.
- Instead of the GoI, the head of the state committee should designate farmer/FPO representatives to the State Level Consultative Committee (SLCC).

#### District level

- Instead of a CEO chairing a District Level Committee, the district's Joint Collector would be a preferable choice. Because the CEO is likely to encounter political pressure, this is the case.
- The district monitoring body should include the chairpersons of the districts' FPOs. The importance of focusing on women should not be overlooked.
- Dairy cooperatives that are doing well may be included as well.

#### CBBOs and FPOs have financial provisions

A significant departure from the current recommendations is the phased payment structure and clear reference to the establishment and incubation of FPOs over a five-year period of up to Rs 25 lakhs over five years and Rs 18 lakhs during the first three years of service. The provisions must include assistance for a CEO and an accountant at a rate of Rs 35,000 per month, a one-time registration fee of up to Rs 40,000 per year, office rent, and utilities expenses, among other things.

The majority of respondents said that the ceiling on preparation and incubation expenditures of Rs. 25 lakh was insufficient, since a lesser incubation investment would result in unstable FPOs. The amount of money required was suggested to be between Rs 35 lakhs and Rs 1 crore. Additionally, respondents felt that a bigger initial allocation of capacity building funding would be more efficient than a predetermined sum every year. Additionally, it was advocated that competitive pay be offered to attract and retain competent experts (such as CEOs and accountants) in organisations. The critical role of recruitment qualifications was emphasised. Additionally, the need of accounting for infrastructure requirements was emphasised.

Provision for the grant of equity and Credit Guarantee Facilities (CGF): Producer members' equity will be augmented by a matching government equity grant to improve the financial foundation of FPOs, as set forth by the Centre. Each farmer would receive up to 2,000 rupees every FPO, up to a maximum of Rs. 15.00 lakh. As long as it is clear that the amount per farmer is up to Rs.2000, the majority of respondents agreed with this approach, even though it may be prohibitively expensive for many small and marginal farmers.

Many respondents said that the equality grant's qualifying standards could be met, but they also offered a variety of ideas about how to do so. According to some, SFAC data from the past should be analysed in order to give better recommendations for the future. It was argued that the minimum paid-up capital requirement of Rs.30.00 lakhs should be slashed, and that any further capital expenditures should be encouraged as much as feasible. Only a small number of FPOs are now eligible for the funding, and establishing four tranches is impractical, according to several replies.

Access to Credit Guarantee Facilities is simple (CGF): A dedicated CGF is planned in the strategy to ensure that FPOs have access to credit from traditional banks and financial institutions by reducing the risk of financial institutions giving loans to FPOs. NABARD and NCDC will maintain a corpus of Rs 1500 crore. Participants were asked if they thought the measure would help FPOs get more funding. This provision was deemed adequate by 86 percent of the respondents.

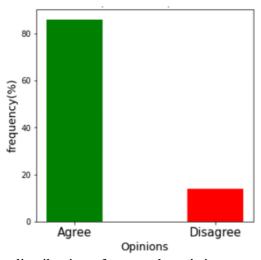


Figure 5: Percentage distribution of respondents' views on adequacy of the CGFs

The consistency of the ELI (Eligible Lending Institute) credit facility rules, and whether this would allow for a bigger flow of funds to the FPOs, received more mixed responses. Some respondents responded that arrangements should be made to increase credit coverage year over year because they believe the coverage level is too low. Others believed that interest rates (on loans) should be kept at 5% or, at the very least, capped at 10% for the first several years. Some argue that, like with MSMEs, a Trust with NABARD, NCDC, SFAC, SIDBI, or banks should be established for better money management. Obtaining a AAA rating for an NBFC, according to one responder, might be challenging.

### Perspectives on FPO promotion training and capacity building

The Bankers Institute of Rural Development (BIRD) will serve as a nodal institution for CEO and Board of Directors training, with NABARD supplying cash. BIRD has been encouraged to collaborate with a few additional institutes. Respondents were asked if focusing on technological transition and technical

understanding was enough to empower CEOs while also allowing for more institute ownership in the long run. While many people thought this was a positive start, there were also various ideas for integrating other training components that are not currently addressed in government training. Among the interesting proposals were:

- In the classroom, a centralised, one-size-fits-all strategy is insufficient. Working with successful FPOs in the region should provide at least 15 days of on-the-job training.
- In addition to virtual training sessions, doorstep handholding, personalised training sessions, and exposure trips would be more beneficial. Exposure to successful start-ups may be evaluated.
- There are a limited number of professional consultants who can be employed at the state level and rotated among CBBO-FPOs. Annually, IRMA and other management institutes might produce a pool of candidates.
- An specific focus should be placed on developing local youth's professional capabilities to manage FPOs by nurturing a feeling of ownership and the ability to take measured risks. Understanding how a company process works is more important than merely having a backup plan.

Several issues and situations were expressed by respondents when it came to ideas for what features should be added to the guidelines. These included the following:

- Vision formation, organisational growth, company management, dispute resolution, financial and inventory management, team building, and legal compliance are all necessary. It should be actively considered how FPO members' relationships and ownership may be enhanced.
- Cost-benefit rationing training, community mobilisation, business orientation and administration, IT (information technology), and communication skills are all needed modules.
- CEOs must be educated in local political economics, self-governance, and entrepreneurship, among other things. The development of instructional tools on networking, social capital, stakeholder identification and management, and the integration of divergent views, among other topics, need further thinking.
- Corporate governance, management accounting, sales process excellence, supply chain management, income tax return filing, and legal compliances all require explicit training.

# Evaluation scheme of the policy

The government intends to have a third party conduct midway (4th year) and endof-term reviews on parameters such as the number of FPOs founded, members, equity grant covered, credit links established, and company turnover, among others. Respondents were asked to remark on the guideline's suitability. While there was general agreement, the following are some of the particular ideas made by the respondents:

- The governance and institution-building components are vital, but concrete requirements are lacking.
- Annual evaluations might be implemented, and management audits made required, based on criteria such as farmer participation, buyer links, renewable energy adoption and value addition, and dividend distribution.
- Baseline surveys, research on diverse value chains, and chances for supporting members' year-round lives might all be budgeted separately. By the end of the first year, or 18 months, this intervention plan should be finished. The payment of the CBBO may be contingent on the implementation of certain initiatives.
- Farmers' empowerment should be emphasised through their leadership in the FPOs. Increased access to information, expertise, input, financing, governance, and financial self-sufficiency should be encouraged through explicit methods.

Connections to current systems and services, such as E-NAM: Respondents were asked to remark on the guidelines' adequacy in terms of their links to current programmes and laws. The following were the most important comments:

- More market participation is required. The post-COVID future should place a greater emphasis on local markets.
- A unique provision on the e NAM platform for female FPOs/FPCs is required.
- The emphasis should be on providing a conducive climate for FPOs to get market access.
- FPOs should be given preference in the distribution of fruits, vegetables, and grains to different government-owned/operated entities such as hospital canteens, ashram schools, and Jawahar Navodaya Vidyalayas, among others. Public Distribution System (PDS) items should also be acquired from local FPOs, allowing production, procurement, and consumption (for the rural poor) to be controlled as locally as feasible.
- A localised function model should be prioritised over distant markets. Consumption commerce (rather than the nexus of intermediate traders) should be used to boost local consumption before providing outside. This is also the current need for sustainability and climate change mitigation.
- FPOs should participate in a few non-farm enterprises on which small and marginal farmers, women, and tribal households rely, such as Non-Timber Forest Produce (NTFP), poultry, and animal husbandry.

#### **Discussion and Conclusion**

The poll, which was designed to gather feedback from key stakeholders, ended up serving as a forum for stakeholders to engage in a lively conversation about the future of FPOs in India. The diversity of perspectives presented mirrored both the different experiences of stakeholders in managing FPOs and the vast range of experiences in institutional structures across India. The 2013 guidelines aided in the formation of the FPO movement in India. Since then, over 7000 FPOs have been established, with NABARD and SFAC playing key roles. The new FPO policy provides a chance to envision FPO 2.0, based on the wealth of knowledge gained by FPOs over the previous decade (Prasad, 2019). According to the study, while

there was agreement on the necessity for consistent rules independent of the implementing agency, there was substantial uncertainty about the new norms with a new NPMA in place. At the end of the poll, respondents were asked for their general thoughts on the policy paper. According to the study, although there is hope and dedication, there are also significant policy objectives. A key source of worry is the lack of investment in capacity-building of FPOs at all levels. Other recommendations for improvement include:

- Annual sharing learning seminars at the state and national levels should be planned.
- A knowledge library of value chain actors in various goods may be established, and web-based peer review services can be offered. Because these principles can also fulfil significant SDGs, they should be mapped with SDG objectives and targets.
- Under the priority sector quota, FPOs should be able to get working capital loans from banks. It is also necessary to differentiate between main and secondary FPOs. Principal will work from input procurement through manufacturing, equipment management for production, harvesting, primary processing (including quality control, weighing, packaging, and grading) all the way to the FPO gate; generally, in B2B mode for distant and B2C local markets. Secondary FPO (market facing) will need high-value capital equipment and complex production procedures. These might participate in business-to-consumer (B2C) for remote markets.

While the guidelines are admirable in their intent, they must consider numerous factors of implementation and practicality in order to fulfil their objectives. To begin with, the absence of any reference to pertinent clauses of the pre-existing 8000 or so FPOs is concerning. As recent investigations have shown, their viability remains a major challenge (Neti, 2020). Overall, while the government looks to be close to fulfilling the two primary roles it may play as a coach and for the FPOs, it appears that the operational rules will require major buy-in from current stakeholders, which appears to be lacking. In the absence of active participation, the existing set of principles may not inspire confidence among farmers to embark on a collaborative business enterprise. They may have difficulty navigating the bureaucratic quagmire' (CS Prasad, 2020).

It is hoped that the impending conclusion of the epidemic would open the door to a series of conversations with stakeholders on this complicated issue of increased agricultural revenues through their own economic operations. In some ways, the poll has confirmed the necessity for multi-stakeholder discussions to enable greater coordination with common aims, such as the much-needed doubling of agricultural incomes. As (Dermont, 2017) has pointed out, increased popular acceptability of policies necessitates bringing the policymaking viewpoint to bear on key players. If the epidemic creates obstacles in this process, technologies such as e-surveys have the ability to provide players who may otherwise be excluded from decision-making a much-needed "voice." As the poll results show, these voices have a lot of influence over policy implementation.

#### References

- Chambers, R. (2015). Inclusive rigour for complexity. *Journal of Development Effectiveness*, 7(3), 327-335.
- Cook, T. (2009). The purpose of mess in action research: building rigour though a messy turn. *Educational Action Research*, 17(2), 277-291.
- Dermont, C., Ingold, K., Kammermann, L., & Stadelmann-Steffen, I. (2017). Bringing the policy making perspective in: A political science approach to social acceptance. *Energy policy*, 108, 359-368.
- Hudson, B., Hunter, D., & Peckham, S. (2019). Policy failure and the policy-implementation gap: can policy support programs help?. *Policy design and practice*, 2(1), 1-14.
- Neti, A., Govil, R., & Rao, M. R. (2019). Farmer Producer Companies in India: Demystifying the Numbers. *Review of Agrarian Studies*, 9(2369-2020-1967).
- O'Toole Jr, L. J. (2000). Research on policy implementation: Assessment and prospects. *Journal of public administration research and theory*, 10(2), 263-288.
- Pieczka, M., & Escobar, O. (2010). Dialogue: Innovation in policy making and the discourse of engagement. In *Political Studies Association Annual Conference*, *Edinburgh*, *April*.
- Prasad, C. S. (2019). Farming as an Enterprise: Ten years of FPO Movement in India. State of India's Livelihood Report; Access Development Services: New Delhi, India, 37-48.
- Prasad, C. S., Dutta, D., & Ravichandran, V. (2020). Issues in Policy Implementation: Insights from an E-survey on Operational Guidelines for 10,000 FPOs.