

Farm subsidy recipient lists:

A case of clear or opaque transparency?

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Mexican law requires that federal agencies publicly disclose basic information about their operations, including their rosters of subsidy recipients.¹ In principle, this mandate allows citizens to detect possible anomalies in how public funds are distributed through these programs, both at the level of individuals and in terms of broader distributional patterns. In this way, governmental transparency creates the potential to encourage public sector accountability.

Public access to the official lists of recipients of Mexico's main agricultural subsidy programs has put this hypothesis to the test through an intense public debate, triggered by press coverage and a civil society project called "Mexican Farm Subsidies." This project, located online at www.subsidiosalcampo.org.mx, is hosted by the public interest group Fundar, Center for Analysis and Research and also involves academics and peasant organizations. The project is based on the official databases of the Procampo and Ingreso Objetivo farm subsidy programs (publicly available thanks to the Federal Transparency and Public Information Access Law, LFTAIG) and presents the data in a much more accessible format (for reasons that will be explained below). The presentation of the official data in this format makes it possible to do searches, and allows the public to learn details about these subsidy payments, showing who receives how much, where and for what. The website's analysis of the official data also reveals the payments' distribution patterns. The data shows, for example, that even Procampo, the Agriculture Ministry (Sagarpa) program that is the most pro-poor, has a very unequal distribution of payments.

This website project, together with Mauricio Merino's analysis (this volume), attracted media interest in knowing more about the distribution of these public resources. The discussion was led by the national newspaper *El Universal* in July, 2009 and again in February, 2010, and was taken up by other national and local media.² This coverage led to questioning and independent assessments of the actual distribution of Procampo and Ingreso-Objetivo subsidies – though the first of these two programs has been operating for 15 years. Analysis of the current beneficiary lists raised the question of whether these programs were fulfilling their original goals.

The journalists' investigation produced a series of influential reports that revealed that the official program beneficiary lists included the names of well-known agricultural sector policy-makers, as well as the names of relatives of alleged drug dealers.³ This led to media discussion of the ways in which Procampo and Ingreso-Objetivo have really been operating during all these years, and members of Mexican society began to ask whether these programs were using public resources in the most appropriate way.

Following the institutional commitment to the timely publication of certain data on the distribution of official subsidies, this significant advance towards open government leads quickly to a "second generation" of questions, largely involving the *quality* of transparency. Some information disclosure strategies generate more public access than others. Indeed, some open government measures are so limited that they lack the combination of accessibility, consistency and reliability that are needed for transparency to fulfill its potential to encourage accountability.

The media coverage of the celebrity beneficiaries of Procampo and Ingreso-Objetivo subsidies included discussion of the relationship between transparency and accountability, especially from the perspective of the limits of the official information. As will be seen below, the official data do not present enough information to confirm whether a name on the list really refers to the specific person that it apparently identifies. In other words, the fact that the name of the current Secretary of Agriculture, Francisco Mayorga, comes up as a Procampo beneficiary does not necessarily mean that it is actually the Secretary himself, because it could refer to another person with the same name. In this case, when the media reported the substantial amount of government funding that the current Secretary and his family received during his period of service as a public official in the agricultural sector, Mayorga confirmed that the name on the list was indeed his (Hernández 2010, Arvizu 2010). He went on to defend his right to be a program beneficiary, arguing that government officials have the right to subsidies if they are farmers (in spite of the rules that prohibit conflicts of interest). According to the Secretary, "I don't think there is any reason to give them up, not even for ethical reasons" (Arvizu 2010). In contrast, Merino cites "the absolute prohibitions in the Agriculture Ministry's rules of operation, published in December, 2007, and those which appeared much earlier in Article 8 of the Federal Law of Administrative Responsibilities of Public Servants" (Merino 2010). Merino further contends that "although there are legal ins and outs to avoid sanctions for receiving subsidies, from the ethical point of view, this is evidently a reprehensible position"

¹ Article 7 of the Federal Transparency and Access to Information Law (LFTAIPG in Spanish) clearly details the information subject to mandatory disclosure requirements. Beneficiary lists for federal subsidy programs are specified under this clause for pro-active disclosure. In other words, this information must be made public by any federal agency operating a subsidy program on their website, without requiring that an interested party file an information request.

² Notably, see the work of Evangelina Hernández and Ignacio Alvarado, of *El Universal's* Investigative Unit.

³ See the two series in *El Universal* at: http://www.eluniversal.com.mx/graficos/especial/EU_procampo/historico.html (for July 2009 coverage), and http://www.eluniversal.com.mx/graficos/especial/EU_procampo (for the February 2010 coverage).

(Hernández 2010).⁴ Meanwhile, Merino observes that the Secretary of Public Administration “prefers to turn the issue over to the state government’s oversight agencies” (Merino 2010).

Meanwhile, as one might imagine, when the media pointed out the presence of relatives of alleged drug dealers on the Procampo subsidy lists, it was not possible to get the same kind of de facto confirmation in the form of public statements by the “accused.” As a result, one cannot claim with 100% certainty that the names on the list correspond to the specific individuals who appear to be identified. However, the fact that there could be doubts about the precise identities of subsidy beneficiaries is a clear example of the limits of what appears to be transparency, as well as its disconnect with accountability.

This raises important issues for the broader debate about the potential for a more transparent public sector to lead to full accountability. First, one must recognize that the media coverage (though limited by the emphasis on exposing scandal) opened up to debate the issue of how subsidy programs distribute public resources, simply by asking whether the current beneficiaries are those who should really be receiving these funds. Second, these revelations and discussions could be a step towards a broader public debate regarding government officials who receive public subsidies from programs in their own sector – the issue of conflict of interest. Third, the debate over who is on the subsidy lists triggered larger questions about the programs’ performance. This points to the narrow agendas of the official evaluations of Procampo and Ingreso Objetivo, insofar as these programs’ evaluations have not addressed their lack of transparency, nor their real impacts in Mexican society. Moreover, the case of the public debate over Procampo and Ingreso Objetivo shows that although transparency can inform the discussion of the impact of governmental programs and where public funds go, this debate has yet to be informed by the involvement of other institutions, such as the judiciary and the congress, which could begin the long transition to accountability.

In this context, this study presents the results of detailed independent analysis of the nature and quality of public data in the lists of recipients of Mexico’s main farm subsidy programs, including but not limited to Procampo and Ingreso Objetivo. The study is based on a series of public information requests sent to ASERCA, formal appeals of denials of information requests, and analysis of official data made possible through the new, independent on-line database, www.subsidiosalcampo.org.mx. Beyond determining whether the names on the beneficiary lists correspond to specific individuals, the goal is to establish, through an independent evaluation of public programs, the degree to which official transparency is meeting its goal of providing the public with quality, reliable information.

In summary, this assessment found that ASERCA’s disclosure measures for its two main farm subsidy programs appear to be very transparent at first, but upon closer examination they are quite opaque. In addition, many of Mexico’s other farm subsidy programs fall short of even the appearance of transparency. In general, all of ASERCA’s subsidy programs share two cross-cutting problems, involving the quality of public data: inconsistency in the presentation and lack of precision regarding who the beneficiaries are and how much they receive.

- One key institutional constraint is that each government agency—and each program within each agency—organizes and disseminates their recipient information differently. The federal transparency law (LFTAIPG) does not set minimum standards for quality and consistency of official data. Farm subsidy policy is more transparent than it was before open government reforms, but the inconsistency in the presentation of the data continues to prevent external observers from determining exactly who gets what from more than one program.
- In addition, farm subsidy data does not consistently reveal how much money individuals or enterprises receive from each program. Even the two most transparent subsidy programs, Procampo and Ingreso-Objetivo, present data that show the amount of each payment to each registered recipient. Yet individuals or enterprises can be registered more than once, which means that the public data *understates* the concentrated distribution of subsidy payments. At the same time, the official registration system allows groups of producers to register together as one recipient (as in the case of the Rural Production Societies, for example), which would lead the data to *overstate* the degree of concentration of payments. In other words, this way of presenting the data on who receives subsidies is distorted in two opposite directions at the same time. As a result, it is not clear whether, on balance, the official data overstates or understates the concentrated patterns of distribution of farm subsidies. Until official farm subsidy databases disclose how much public money goes to each individual, it will not be possible for the public to know who gets what in farm subsidy payments.

⁴ For additional details, see Merino (this volume).

1. PUBLIC ACCESS TO FARM SUBSIDY DATA

The mandatory disclosure of recipient lists required by the federal transparency law (LFTAIPG) has increased public access to information about who is getting what from ASERCA's two largest farm subsidy programs, Procampo and Ingreso Objetivo. More information is currently available online than ever before about each program's subsidy recipients, at least for those specialists with the skills necessary to navigate official databases. However, the federal transparency law includes no requirements regarding how each agency, or each program within each agency, organize and present their information. The law requires agencies to publish *whatever* information is currently in their possession regarding subsidy recipients, however that information may be organized or presented. They are not required to *generate* information that is not currently in use by the agency.⁵ This lack of minimum standards and consistent format is an obstacle to public scrutiny of these public expenditures.

Because of institutional limitations, though many farmers and agribusinesses receive subsidies from multiple programs at the same time, the current information disclosure system prevents observers from knowing exactly who gets what from more than one program. The cause of this opacity is that each of the different agricultural agencies and programs use their own lists for keeping track of subsidy recipients. In addition, most programs assign subsidy recipients their own separate individual identification number, which prevents analysis of who gets what from more than one program. Policymakers have suggested that they plan to address this issue, but as of early 2010, tangible changes have yet to be seen. This combination of the lack of a universal subsidy recipient identification number or a centralized beneficiary list that includes all the relevant programs greatly complicates the extent to which current open government reforms can bolster accountability in farm subsidy programs.

Most programs present their information about farm subsidy recipients with a high degree of internal homogeneity, as will be discussed below. In the best cases, programs assign farmers an identification number specific to that program, which remains somewhat consistent over time and therefore allows some tracking of subsidy payments to farmers across years within that program. However, this is not always the case, and independent analysis of beneficiary lists found examples of direct-payment subsidy programs whose recipient lists do not include unique farmer identification numbers, and therefore do not even allow tracking of payments across years within the same program.

Overall, it is currently impossible to know the aggregate amount of subsidies that any one farmer receives across programs for any year with any certainty. Since, at best, the ID number assigned to a farmer is unique only to one specific program at a time, it is quite possible that a farmer has dozens of different ID numbers when receiving funding from multiple programs, and/or several payments within a given program. Since programs are not currently required to publish information that identifies each individual farmer, there is no way to know with certainty whether the same name, either within a program or across programs, is indeed the same person or a case where two different people have identical names.

This issue has gained significance, as government responses to public information requests have consistently argued that additional information permitting the identification of farmers beyond the publication of their names is either unavailable, or not subject to official transparency requirements.⁶ While it is important that individuals' private personal information be protected, if it is true that identifying information on individual farmers is *unavailable* (meaning that government has not gathered this information, regardless of whether publishing it violates privacy clauses), this would imply that even the government is unaware of how much funding any one farmer is receiving from the whole range of farm subsidy programs.

The following section presents the results of an independent assessment of public access to recipient data for each of Mexico's main farm subsidy programs,

- **Procampo, Mexico's largest direct payment agricultural subsidy program representing over 60% of ASERCA's budget (over 20% of Sagarpa's total budget), publishes by far the most comprehensive farm subsidy information available.** Currently, ASERCA publishes and frequently updates the full recipient lists for Procampo online, for all of the over 2 million registered beneficiaries of the program since its inception in 1994.⁷ This information is easily downloadable in Excel, and includes detailed data on each recipient's name, the state and municipality where their land is located, their crop, the amount of land funded by the payment, and the payment amount (among other details provided).

⁵ Article 42 of the LFTAIPG clearly states that agencies are only required to give out information already in their possession.

⁶ Interview held in SAGARPA's offices with Graciela Aguilar, Director of ASERCA and Alberto Cárdenas, then Minister of Agriculture, August 11, 2009. See also information request number: 0810000021607. Note that official public information requests are available for consultation through the IFAI's Zoom search engine, at <http://buscador.ifai.org.mx/buscador/bienvenido.do>

⁷ Available at http://www.aserca.gob.mx/artman/publish/article_1424.asp

Files are presented by year, season, and state. Within the Procampo database (and over time), each recipient is assigned a Procampo Farmer ID for their payments. As will be discussed in further detail below, this Farmer ID permits multiple registries and is not sufficiently unique to distinguish between farmers with similar names.

- **Ingreso Objetivo, Mexico's 3rd largest subsidy program, part of ASERCA's Marketing Supports programs which represent over 18% of the agency's budget, and just under 10% of the overall Sagarpa budget, also makes available highly comprehensive information on recipients.** Originally, to qualify for Ingreso Objetivo payments, a potential recipient was required to be registered in the Procampo database. As a result, the information registered for Ingreso Objetivo beneficiaries closely resembles the public Procampo data, and on some occasions uses the same Farmer ID to identify payments administered through Ingreso Objetivo (though not always). The databases publicly available on ASERCA's website for this program are also easily downloadable in Excel, and provide equally disaggregated information on each payment, including farmer name, Farmer ID, geographic information, crop, tonnage subsidized, and payment amounts (among other data).
- **Beneficiary lists for Mexico's 2nd largest agricultural subsidy program, The Program for Acquisition of Productive Assets (El Programa para la Adquisición de Activos Productivos, previously known as Alianza para el Campo), which represents around 18% of Sagarpa's budget, are much more difficult to obtain and are highly inconsistent.** Funded by the federal Agriculture Ministry but administered by state and municipal governments, the umbrella investment subsidy program long known as Alianza para el Campo does not currently publish a single national database of program recipients. While there are certain national eligibility guidelines established each year at the Federal level, state and local governments are ultimately responsible for determining who will receive funding from the programs in their state or region. Therefore, each state maintains its own recipient lists, whose organization and accessibility vary widely. As a result, it is very difficult to verify the degree to which federal eligibility standards are respected in practice.

Monitoring is also complicated by the umbrella program's division into involves numerous components and sub-programs within the federal Agriculture Ministry (Sagarpa). Funds for the program are a combination of federal, state and municipal budget transfers, all of which are concentrated into state government public trust funds (*fideicomiso* in Spanish).

Together, these factors effectively block public access to information about who is receiving funding- and for what- from the Alianza investment support programs. The overall amount of money that is being spent for these programs in each state is very difficult to uncover, as access to information about *fideicomisos* is a grey area in the current LFTAIPG, and each state has its own local transparency laws, which are very uneven in their scope and accessibility.⁸ The fact that each state or municipality also chooses who will effectively gain access to these programs also means that the construction of a national recipient list depends entirely on the timeliness in which each state makes their recipient information available (if at all), and the quality of each state's program data.⁹

- **ASERCA's remaining subsidy programs, now known as Compensatory Supports (formerly known as Marketing Supports) continue to be opaque.** Ingreso Objetivo is only one element of a larger package of marketing subsidy programs. ASERCA currently operates an additional 10 sub-programs operating under this umbrella subsidy program, all of which are garnering increasing budget allocations since direct payments to support corn prices to farmers through Ingreso Objetivo have fallen since 2006. Recently, ASERCA has begun publishing recipient lists for the remaining Marketing Supports programs, though these files are not located in the "Recipient Lists" section of their website, and instead are to be found within the descriptive information available about each sub-program.¹⁰

Information about recipients of the Marketing Supports subsidies (with the partial exception of Ingreso Objetivo) is presented in such a way that it makes it very difficult to truly understand who is receiving funding, where, for what reason, and for how much—despite the fact that these programs provide very large payments to recipients, often for many millions of pesos at a time.¹¹ Access to this data is difficult because each sub-program posts a series of files, often in PDF or in a series of disjointed Excel files, which contain minimal information on the recipients of each sub-program, if recipient information is available at

⁸ For more information on the complexity and opacity of state government budgets, including their limited agricultural spending information, see the work of the state budget transparency project, led by Juan Pardinás of the Instituto Mexicano para la Competitividad (IMCO), at <http://imco.org.mx/finanzaspublicas/>

⁹ For analysis of how these investment subsidy programs allocate resources, see Palmer-Rubin (this volume).

¹⁰ Files are scattered throughout the information available in the "Our Programs" section, at <http://www.ASERCA.gob.mx/subhomes/NuestrosProgramas.asp>.

¹¹ See Box 5 in Fox and Haight (this report) for examples of transnational corporations that receive millions of pesos in payments through the Marketing Support sub-programs.

all.¹² Additionally, not all files for a given program during a consistent period of time are available in the same on-line location. This study found a number of cases where recipient lists for export or storage subsidies are embedded within the recipient information for an entirely different program.¹³

Most of these sub-programs do not include any type of ID number attached to recipients, and for those that do have a unique number corresponding to a specific recipient, this number varies from year to year because it reflects the number attached to their application for funding rather than assigning a number to the recipient themselves. In other words, most sub-program recipient lists are either lists with no identifying information attached to each recipient, or if they do attach an “identifier”, it is the number of that year’s application and not a consistent ID that can be tracked across time.

Some sub-programs do not specify even the state in which the recipient is located. Instead, the files refer to a group of states without specifying which recipient received funding in which state in the group. Some sub-programs’ recipient lists refers to a region rather than to state or municipalities.

Overall, ASERCA’s organization and presentation of subsidy data for most of the Marketing Supports sub-programs makes it very difficult to compare the distribution of payments either over time within the same sub-program, or across sub-programs for the same year. The presentation of these recipient lists is chaotic at best, and even after a significant research effort to organize the data in a way that would permit comparisons across programs within the same year (a monumental task unto itself), the incompleteness of the information provided makes it extremely difficult to know with any degree of certainty the aggregate amount of Marketing Supports subsidies paid to any one farmer, organization or company.

The public interest group, Fundar, has made repeated attempts to access greater levels of detail on the payments made through these programs.¹⁴ While limited progress has been made in a small minority of cases, unfortunately the predominant ASERCA response has been that the information currently available on their website is the “best that they can do” in terms of providing detail about subsidy recipients. Some officials claim that the nature of the program in question does not permit the collection of greater detail on who receives payments. Others claim that providing any additional information would violate the private personal information of the recipients. Others simply claim that despite their best efforts, the agency cannot be responsible for gathering the level of detail that Fundar has requested, and since they are not required to *generate* information in response to an information request, since the information requested is not already being gathered in the format requested, they are not required to provide it.

Overall, the case of the Marketing Supports sub-programs (other than Ingreso Objetivo) shows that despite ASERCA’s formal compliance with the official mandate to pro-actively publish recipient lists, the agency is far from transparent about these direct marketing subsidy programs’ actual distribution of payments.

- **Similarly, recipient lists for ASERCA’s fuel and other subsidies are nominally available, but they provide insufficient information and are difficult to decipher.** ASERCA formally complies with LFTAIPG mandates, insofar as all of the programs it directly operates provide at least nominally public recipient lists through their website—including its “commercial strengthening” and fuel subsidy programs. However, as is the case with the Marketing Supports sub-programs (apart from Ingreso Objetivo), the availability of these recipient lists for the remaining subsidy programs does not necessarily facilitate independent monitoring or analysis of subsidy recipients.

In the case of the fuel subsidy programs, which include 3 subprograms designed to subsidize the cost of fuel used in tractors, other farm machinery and fishing boats, recipient lists are published in PDF format, presenting information in a .txt format that is extremely difficult to read.¹⁵ The information is not presented in a table, rather it is a list of text divided by a series of vertical lines (that vary for each entry in the list) indicating the state, district, sub-district, name and payment amount. No identification number for each recipient is presented.

Separate files indicate, for each state, the overall consumption (in liters) for a given time period, as well as price variations. However, even if one compares these files with the ac-

¹² For example, the sub-program *Apoyo a la Inducción de Patrones de Producción de Oleaginosas* currently had no recipient information available online as of December 14th, 2009.

¹³ Information in varying harvest cycles, and sub-programs related to transportation and export subsidies, are often embedded in files claiming to pertain to storage subsidies, for example.

¹⁴ See information requests cited above.

¹⁵ See http://www.aserca.gob.mx/artman/publish/article_1234.asp

tual recipient list, it is impossible to relate how many liters, and at what price, each individual recipient consumed and therefore what exactly was subsidized. After deciphering the difficult presentation of the recipient data, we know the amount that ASERCA paid each recipient, but it is impossible to determine how many liters were covered and at what price per liter.

Because of the nature of the presentation of this information, in addition to the limits on comparing the multiple files available, it is extremely difficult to perform an independent analysis of who is receiving these fuel subsidies, where, and why. The files are thousands of pages long for each year, they are password protected (limiting the possibilities of viewing the documents in any other format). Even when printed, they are extremely difficult to read, let alone compare across states even within the same year. Comparing subsidy distribution over time is an equally difficult task, limited also by the lack of a unique identification number for each recipient.

- **While Procampo's recipient lists date back to the beginning of the program (1994), information about Compensatory Supports (Apoyos Compensatorios) prior to 2000 is very difficult to obtain.** The currently available databases for Procampo provide detailed information on the history of subsidy payments since the first checks that were issued under the program. In contrast, however, the programs now operating under the umbrella program, Apoyos Compensatorios (or Apoyos a la Comercialización), which have been in place since 1991, do not disclose historical payment data.

What began as essentially a package of subsidies designed to also compensate crop purchasers as agricultural markets were increasingly "opened", since then has undergone a series of sub-divisions breaking out each funding line into different sub-programs, each with their own rules, and therefore also their own recipient lists (as discussed above).

The notable exception is Ingreso Objetivo, whose publicly available recipient lists are not only the most complete of all the Marketing Supports sub-programs, but also provide information for payments made since the program was implemented as such (files go back to 2000).

However, the remaining sub-programs—many of which provide very large payments of many millions of pesos to small numbers of recipients—have gone through a series of reconfigurations making the historical reconstruction of exactly which programs were operating in which years very difficult to decipher. Most of the currently publicly available recipient lists are much more recent; 3 sub-programs only provide information starting in 2008, 1 goes back to 2007, 3 to 2006, 1 to 2004, and only 1 program provides details from 2002 forward.

An information request submitted to obtain data about recipients of Marketing Supports payments from the program's inception to date produced a response providing information from 1999 forward.¹⁶ The file provided was a Word document containing a series of photos (.jpg files) of tables of recipients, making the comparison of recipients over time very difficult, especially for those programs whose recipient lists publicly available online do not go back very far in time.

These difficulties in the organization and presentation of the data publicly available for recipients of the Marketing Supports sub-programs (with the notable exception of Ingreso Objetivo), combined with the lack of reliable and accessible information on the historic distribution of the program, make an overall understanding of how these funds have been spent, where they've gone, and why, a very difficult task. Given that these programs provide substantial amounts of funding to those who are able to access them, it is notable that formal compliance with transparency requirements does not provide sufficient information to understand how the payments are distributed.

Overall, on the one hand, ASERCA offers a high degree of detail available in its Procampo and Ingreso Objetivo recipient lists, which provide more comprehensive information on the real distribution of subsidy payments than any other agricultural program. On the other hand, however, ASERCA is simultaneously responsible for some of the most opaque recipient lists in their Marketing Supports, fuel and other subsidy programs.

¹⁶ See information request 0810000040808.

2. CONSISTENCY AND RELIABILITY OF OFFICIAL DATA ON SUBSIDY RECIPIENTS: THE CASE OF PROCAMPO

Transparency is a necessary—if insufficient—condition for accountability. We have seen that for many of Mexico’s major agricultural subsidy programs, formal compliance with mandatory disclosure requirements does not necessarily bolster transparency, since the data presented is ways that render the information largely inaccessible. In other words, for programs such as the Marketing Supports subsidies and the Alianza investment programs, “disclosure” does not even imply “transparency”.

In the case of those ASERCA programs that *are* more transparent, such as Procampo and Ingreso Objetivo, taking the necessary steps to move further along the path toward accountability depends on a number of additional factors. On one hand, interested parties would need to take advantage of government transparency in order to perform independent analyses that inform public debate about program operations. In other words, watchdog groups, program evaluators, the media and academics can use greater degrees of transparency to bolster accountability when they adequately utilize the information available to evaluate program performance, generate alternative proposals, and hold government officials to task for compliance with existing regulations.

However, independent actors’ capacity to act on newly transparent information depends also on the *quality* and *reliability* of the data provided. Though the government’s official subsidy recipient registries are now publicly accessible, this new level of transparency does not address problems of data quality. This complicates the degree to which transparency can promote accountability. In the case of ASERCA’s most transparent and comprehensive recipient lists, for Procampo and Ingreso Objetivo, independent analysis shows that the information publicly available is insufficiently reliable to ensure that the data actually reveals who is getting what from these direct payment programs. The principal weaknesses in data reliability are detailed below:

- **The publicly available recipient lists for Procampo report information on individual payments, not individuals.** Procampo payments are technically tied to the land parcel that is receiving funding, not necessarily to the farmer or enterprise that is cultivating it. When the land is registered in Procampo it is assigned its own parcel ID number (*folio de predio* in Spanish). However, this land-identifier is not currently available in the publicly accessible recipient lists. What is available is an ID number assigned to the farmer who is receiving the payment (*clave de productor* in Spanish). However, any one individual farmer may have multiple Farmer ID numbers within the Procampo registry, even during the same harvest cycle. Essentially, every time Procampo issues a payment to a program recipient, that payment is recorded according to the Farmer ID for the individual or organization receiving the payment, which may not necessarily be the only Procampo Farmer ID they have been assigned. Therefore, any one individual may appear several times in the Procampo registry. While information about the municipality in which the land is located, and the number of hectares receiving funding is included, none of the payment information is linked to the original land identifier.
- **Many individuals have multiple producer numbers in the Procampo registry, for reasons that are not clear.** It is both possible and legal that a farmer could register more than one plot of farmland upon signing up for Procampo. Therefore, a farmer could understandably be associated with several different land identifier numbers (*folios de predio*) registered with the program. However, there is no clearly defined relationship between the Farmer ID number that Procampo assigns to individuals, and the land for which they are receiving the payment.

ASERCA has not provided any official explanation as to how Farmer ID numbers have been assigned to individual Procampo recipients over time, and no additional identifying information on individuals is provided. Currently, what this implies is that there is no way to know with certainty whether the multiple appearances of identical names under different Farmer ID numbers are indeed the same person, or whether they are different people located in the same place who happen to have identical names.

One possible explanation for assigning multiple Farmer ID numbers to the same individual could be explained by the practice of land rental. Procampo’s operating rules permit rental of farmland, and the program has encouraged rental throughout its history, which may explain why some farmers have been assigned multiple ID numbers. It could be the case that when an individual rents someone else’s land for a given season, the land owner cedes

their Procampo payment to the renter as part of the rental package. In this case, if the renting farmer also has their own land registered in Procampo, it is possible that in the case of the rental transaction, the farmer was assigned a new ID number.

Procampo's director reported that as much as 80% of the payments issued during the Fall-Winter harvest cycle are paid to renters rather than to landholders.¹⁷ If it is the case that some of the multiplication in Farmer ID numbers is due to extensive land rental, then it is still unclear whether or not the rental Farmer ID has remained consistent over time, or is also constantly changing.

ASERCA has yet to clarify how Farmer IDs are assigned to individuals or to organizations, which greatly limits the capacity of independent analysis to document distributional patterns in subsidy payments. Since there is no clear association between names that coincide and ID numbers, and in the absence of an official explanation as to how the Farmer ID is assigned, there is no way to know with certainty either who is receiving these payments, or the aggregate amount of funding that an individual farmer or organization might be receiving.

To underscore the scale of this problem, the publicly available recipient lists for just the "Tradicional" component of Procampo indicate that there have been over 5.3 million distinct Farmer ID numbers assigned to individuals and/or organizations over time.¹⁸ However, the official number of "producers benefited" by Procampo recipients in 1995 was 2.9 million, according to the *Informe de Gobierno* (apparently referring to individual producers). The number of "producers benefited" was still 2.8 million in 2002, but fell to 2.4 million in 2008.¹⁹ In other words, the number of Farmer ID numbers that have been assigned to individuals or organizations over time is considerably higher than the official count of the total number of farmers participating in the program (especially in recent years).

- **The Procampo plot number is the only reliable identifier that has not changed over time.** However, this information is not currently publicly available, and the current Director of ASERCA indicated that the sensitivity of this information (arguing that its release would permit the localization of program beneficiaries) prohibits its release to the public.²⁰ If this information were made publicly available, one would be able to track the overall amount of payments that have been made to each plot of land enlisted in the program. However, this would still not resolve the issue of how to confirm who has been receiving payment for working a given landholding.

Access to the ID numbers for specific landholdings would permit an analysis of the degree to which that parcel (or portions thereof) have been subject to rental. One could ostensibly see the variety of Farmer ID numbers that have been issued payments for each parcel of land, and whether or not the land has been funded in its entirety or sub-divided. However, access to this kind of data would not solve the problem of knowing whether or not the potentially multiple Farmer ID numbers related to a parcel pertain to the same person or different people with identical names.

Researchers interested in gaining greater detail about the absolute number of distinct individuals receiving Procampo subsidy payments filed information requests to ASERCA asking for greater specificity in the information about the Procampo registry. The official responses revealed that ASERCA does actually have in its possession information permitting the distinction between multiple Farmer IDs, similar names, and distinct individuals. Such additional information, when pertaining to individuals rather than organizations, includes Mexico's national universal population registry number (CURP in Spanish) assigned to individuals when their birth is registered. Since this code contains potentially sensitive personal information, its release would violate privacy clauses in the transparency law, but the fact that ASERCA does indeed appear to have this number in its records implies that they *are* able to associate multiple IDs with distinct individuals. At the very least, the fact that ASERCA does have the capacity to relate ID numbers to individual names with greater certainty implies that the creation of a more consistent Farmer ID number is not inconceivable.

At the same time, in the interest of protecting private personal information, another additional piece of information that could be useful for discerning between individuals with identical names could be the inclusion in the publicly available databases of the locality where the individual's payment is issued. While this would not provide total certainty that the listing of more than one person with the same name in the registry indeed refers to the same individual, the currently available information only provides data on the *municipality*

¹⁷ Information provided by then-Procampo Director Gustavo Adolfo Cárdenas Gutiérrez, June 19th, 2009 in the Procampo offices.

¹⁸ See www.subsidiosalcampo.org.mx

¹⁹ Gobierno Federal (2009) and Information request No. 0810000025509, available for public consultation through the IFAI's Zoom search engine, at <http://buscador.ifai.org.mx/buscador/bienvenido.do>.

²⁰ Meeting with Graciela Aguilar, Director of ASERCA and Alberto Cardenas, then Minister of Agriculture, held in SAGARPA's offices, August 11, 2009.

where payments are issued (comparable to a county). It is much less likely that different individuals with identical names reside in the same *locality* than if producers had the same names within a *municipality*. While this approach would not provide 100% certainty as to whether the multiple Farmer IDs attached to an identical name are indeed the same person, it would decrease the likelihood that repeated names refer to different individuals.

- **The clarification of the relationship between Procampo's Farmer ID number and individuals would still not resolve the simultaneous issue of payments to organizations that distribute subsidies to their members.** Procampo's rules also permit a cooperative, organization, *ejido*, or other collective enterprise to register for subsidy payments as a group. This implies that the different land parcels associated with such an organization are grouped together in the payment process, and only one check (or deposit) is issued to the organization as a whole (rather than directly to the individuals involved in the organization). The organization then distributes this lump sum payment among its members.

Procampo's registry also assigns Farmer ID numbers to organizations. There are cases where the same organization is assigned multiple ID numbers, for reasons that are just as unclear as in the case of the same practice with individuals. Currently, it is impossible to know how many individual farmers are involved in a registered organizations, or within their membership, how many will receive a portion of the Procampo payment for any given harvest cycle. Information requests to ASERCA, in addition to direct conversations with ASERCA staff, indicate that even ASERCA does not know how many individuals will receive portions of a payment that is made to an organization.²¹

ASERCA claims that since local Sagarpa offices (CADERs) are responsible for receiving Procampo applications, there is no way that the central offices can control the quality of the data. Additionally, ASERCA claims that gathering such a high level of detail on each individual in the program (much less such detail on members of organizations), considering that there are over two million beneficiaries, and given that it would involve coordinating with so many local government offices.

- **For these reasons, the Procampo registry simultaneously over-counts the total number of individual recipients, and at the same time undercounts the number of distinct farmers receiving funding as members of organizations.** The net effect of these two distortions on the total overall number of Procampo beneficiaries is not clear. In the Federal Audit Agency's review of ASERCA's 2006 performance, they found 2.56 million producers and 3.48 million parcels on the rolls (ASF 2008: 428). According to ASERCA data reported in President Calderon's annual state of the nation report (*Informe de Gobierno*) for the same year (2006), there were 2.32 million farmers enrolled in the program.²² ASERCA's response to an information request that specifically asked for a response indicating the "total number of unique individuals" receiving payments through the program reported that, in 2006, there were approximately 2.75 million farmers enrolled in the program.²³

These inconsistencies, only for the case of 2006, are not minor, since they represent differences of between 190,000 to 430,000 farmers. This latter variation corresponds to the difference between the two figures that ASERCA provided in the total number of program beneficiaries. Other than the formal response to the information request, neither the *Informe de Gobierno* nor the ASF Audit Report clearly define how they reached their conclusions about the distinct number of individual farmers participating in the program. In other words, for the two official published reports, we do not know if they simply added up the total number of Farmer IDs (simultaneously *over-counting* of individuals with more than one ID during 2006, and *undercounting* because of the members of organizations included), nor whether they used some other methodology to address questions raised by the data (such as whether identical names refer to the same person or not). The fact that these two counts vary implies that they must have used different criteria to establish what "counts" as an individual in determining their overall quantities of program beneficiaries.

In ASERCA's response to the information request cited above, officials reported that they solved the problem of over-counting individuals by claiming that the numbers provided were calculated after associating each individual with additional identifying information (such as their name, CURP, birthday, birthplace, and other information). However, they openly stated that in the case of organizations, each one was only counted once according to its corresponding Farmer ID.²⁴ Therefore, it is remarkable that this particular calculation

²¹ Interview with Graciela Aguilar, then Director of ASERCA and Alberto Cárdenas, then Minister of Agriculture, SAGARPA, August 11, 2009.

²² Gobierno Federal (2009: 196) (en el archivo correspondiente a "Economía competitiva")

²³ See information request 0810000025509

²⁴ Information request No. 0810000025509. The exact text of the response to the information request states the following, "Note: Because a producer can have more than one Farmer ID, to count the individual producers one groups together the father's last name, the mother's last name, the first name, the date of birth, the state of birth, CURP and Electoral Registration number for physical persons, and in the case of moral persons [enterprises], they are only counted by Farmer ID." (sic)

of the number of beneficiaries in Procampo is the highest of the 3 official sources available, since methodologically the issue of over-counting individuals with multiple ID numbers was ostensibly resolved, and we are left with the problem of undercounting the number of distinct individuals that may be sharing a single Farmer ID through their organization.

The undercounting issue is highlighted by the fact that the largest payments made through Procampo are issued through organizations. The top 14 recipients over time of Procampo Tradicional are all groups rather than individuals, including mostly private enterprises, but also a large indigenous *ejido* in the state of Jalisco (see Maldonado, this volume).²⁵ In fact, there are only 7 individuals in the list of the top 50 recipients of the Procampo Tradicional program between 1994-2008.²⁶

- **This ambiguity as to who exactly receives what from Procampo makes it impossible to carry out a consistent analysis of the distributional patterns of subsidy payments, or to monitor compliance with existing rules.** The absence of the parcel ID number from the publicly available recipient lists means that payments cannot be accurately tracked to the specific land that is being funded. At the same time, the insufficiently precise Farmer ID number, both for individuals and organizations, and the lack of an official explanation as to how the Farmer ID is assigned, means that tracking payments at the individual level is impossible to achieve with precision. The only accurate analysis of distributional patterns that can currently be carried out would be the distribution of payments at the municipal level over time. While this analysis would allow one to see where the money has been going, and the degree of concentration in the geographic distribution of payments, an analysis of the degree of concentration in payment distribution at the individual level (i.e.: who gets exactly what, in comparison to what others get) will be imprecise as long as the Farmer ID problems persist.

Another important independent analysis that is currently impossible to perform with precision, which is important from an accountability perspective, would be an independent evaluation of the degree to which Procampo payments respect the program's established operating rules. When Procampo was first created via Presidential Decree, it was established that payments would be limited to 100 hectares of irrigated land, or its equivalent in rainfed land (noting also that these are the landholding limits established in the Constitution following the agrarian reform). However, it is unclear whether, in practice, any authority was ever tasked with ensuring compliance with this ceiling, at least before 2009 (see Box 1). These provisions did not address land rental, which left open a space for discretionary action. The payment ceiling of 100 hectares of irrigated land was reiterated in 2004, when Congress included these restrictions on Procampo payments in its Budget Decree. In April, 2009, the Agriculture Ministry and ASERCA agreed to further limit Procampo payments to individuals, publishing in Procampo's operating rules a limit of \$100,000 pesos per farmer per harvest cycle (US\$8,000).

These official limits on Procampo payments restrict the amount of funding that any one individual is allowed to receive. However, since there is currently insufficient information publicly available to track with certainty payments at the individual level, it is impossible to independently verify whether these legally established limits are being respected.

For example, even after the April 2009 changes in the operating rules, some producers continued to receive amounts that considerably exceeded the established ceilings. As shown in Box 1, which is by no means a complete list of the violations of the rules, ASERCA's own data revealed that the made payments of more than \$100,000 pesos each to many individuals producers for the spring-summer 2009 crop cycle. [Editor's note: One year later, however, Procampo payment ceilings appeared to be respected for the first time (see below), possibly in response to increased public scrutiny.

²⁵ www.subsidiosalcampo.org.mx

²⁶ www.subsidiosalcampo.org.mx

BOX 9:**NONCOMPLIANCE WITH PROCAMPO RULES OF OPERATION: INDIVIDUALS WHO RECEIVED MORE THAN M\$100,000 (SPRING-SUMMER 2009)****Ana Joaquina Ruiz Guerra (Fundar)**

According to Procampo's Rules of Operation, no individual is allowed to receive more than 100,000 pesos in subsidies, starting with the Spring-Summer 2009 crop cycle. Nevertheless, these rules were not strictly applied. Here follows a table which shows the beneficiaries who received more than 100,001 pesos for the Spring-Summer 2009 crop cycle.²⁷

ASERCA Subsidy recipients listed who received more than M\$100,00 from PROCAMPO Tradicional – Spring-Summer Crop Cycle 2009				
Producer Name	State	Area funded (hectares)	Amount of funding (pesos)	Ciclo
HANUN JORGE JORGE ALFREDO	Tamaulipas	328.6	\$ 316,441.80	PV09
ZUNIGA CEPEDA MARIA GUADALUPE	Tamaulipas	301.84216	\$ 290,674.00	PV09
GARCIA MEDRANO J SERGIO	Durango	257.54	\$ 251,824.12	PV09
MANZUR NADER SANDRA	Tamaulipas	249.13	\$ 239,912.19	PV09
ARELLANO CANALES MARIA BRISELDA	Tamaulipas	208.17	\$ 200,467.71	PV09
DE LA GARZA COLLADO LUCAS	Tamaulipas	207.68432	\$ 200,000.00	PV09
ARGUELLO HERNANDEZ ALEJANDRO	Tamaulipas	204	\$ 197,800.00	PV09
RAMOS FLORES JAVIER	Jalisco	202.84216	\$ 197,022.00	PV09
DE ANDA SANCHEZ SAUL EDUARDO	Tamaulipas	203.84216	\$ 196,300.00	PV09
CARDENAS CHARLES JOAQUIN	Tamaulipas	203.84216	\$ 196,300.00	PV09
BARRON TIJERINA ASCENCION	Tamaulipas	200	\$ 192,600.00	PV09
ELIAS SUDERMAN AGANETA	Chihuahua	193.84216	\$ 186,670.00	PV09
URIBE RIVERA DAFNE ALEJANDRA	Tamaulipas	180.005607	\$ 173,345.40	PV09
LOAIZA CONTRERAS JOSE DIEGO OSCAR	Puebla	180	\$ 173,340.00	PV09
DE LA GARZA MORANTES CESAR	Tamaulipas	178.84216	\$ 172,225.00	PV09
MONTES NEVAREZ SAMUEL	Chihuahua	155.5	\$ 166,875.50	PV09
TINOCO TINOCO MANUEL	Durango	171	\$ 164,673.00	PV09
UNGER WIENS ELIZABETH	Chihuahua	169.24216	\$ 162,980.20	PV09
JAQUEZ FLORES JUAN ANTONIO	Chihuahua	167.68432	\$ 161,480.00	PV09
GIESBRECHT REIMER JUAN REYNALDO	Chihuahua	166	\$ 159,858.00	PV09
PEREZ ROMO MERCEDES	Jalisco	165	\$ 158,895.00	PV09
ORTIZ HERRERA JOSE LUIS	Zacatecas	161.12	\$ 155,158.56	PV09
LOPEZ SOLIS JOSE	Zacatecas	152	\$ 146,376.00	PV09
SILVA GOMEZ JOSE LUIS	Chiapas	112	\$ 145,600.00	PV09
BRETON Y BRETON JAIME ELOY	Tlaxcala	145	\$ 139,635.00	PV09
ARGUELLES URENO ABRIL	Tamaulipas	144	\$ 138,672.00	PV09
VILABOA MURILLO ROBERTO	Veracruz	140	\$ 134,820.00	PV09
ABRAMS ZACHARIAS WILHILEM	Chihuahua	136.5	\$ 133,321.00	PV09
PEREZ ARCE LILIA SUNANA	Tamaulipas	137.5	\$ 132,412.50	PV09
RAMOS ZAVALA ARTURO	Tamaulipas	133	\$ 128,079.00	PV09
CRIVELLI CRUZ CARLOS ANTONIO	Veracruz	132	\$ 127,116.00	PV09
HERNANDEZ CHAVARRIA ALFREDO	Jalisco	131	\$ 126,153.00	PV09
LANDA ARROYO AURORA MIRIAM	Veracruz	130.35	\$ 125,527.05	PV09
LOPEZ GALVEZ JOSE GALDINO ANASTACIO DE JESUS	Puebla	129	\$ 124,227.00	PV09
ARELLANO GURROLA JUAN	Zacatecas	129	\$ 124,227.00	PV09

²⁷ The list does not include those who received exactly 100,000 pesos because, technically, that was permitted by the Rules of Operation.

Producer Name	State	Area funded (hectares)	Amount of funding (pesos)	Ciclo
SANTOS RODRIGUEZ MARTHA PATRICIA	Tamaulipas	126.1896552	\$ 122,149.00	PV09
ACEVES FERNANDEZ FRANCISCO JOSE	Aguascalientes	125	\$ 120,375.00	PV09
MORALES ROMAN TERESA	Veracruz	125	\$ 120,375.00	PV09
VALLES MATA MA ELSA	Durango	122.614746	\$ 119,260.00	PV09
MENCHACA MUNOZ SALVADOR	Zacatecas	115	\$ 116,297.50	PV09
HERNANDEZ RECENDES J JESUS	Aguascalientes	120	\$ 115,560.00	PV09
ZUNO CHAVIRA MARIO ALVERTO	Chihuahua	120	\$ 115,560.00	PV09
ARRIETA CARDENAS MARIA OLIVIA	Durango	120	\$ 115,560.00	PV09
SOSA RINCON MARIA EUGENIA	Veracruz	120	\$ 115,560.00	PV09
AVALOS MARTINEZ ARMANDO	Tamaulipas	112.21	\$ 115,053.05	PV09
BEJARANO GARCIA ROGELIO	Chihuahua	119.35	\$ 114,934.05	PV09
FAVELA DURAN GABRIEL	Baja California Sur	118	\$ 113,634.00	PV09
DOMINGUEZ HERNANDEZ JORGE	Zacatecas	117.71	\$ 113,354.73	PV09
GRIJALVA GONZALEZ OSCAR ISIDRO	Chihuahua	117	\$ 112,671.00	PV09
TERAN FLORES BRENDA GUADALUPE	Tamaulipas	114.17216	\$ 109,947.79	PV09
LOPEZ GALVEZ JOSE GALDINO ANASTACIO DE JESUS	Tlaxcala	114	\$ 109,782.00	PV09
JACOBO RODELO JESUS ARTURO	Sinaloa	109	\$ 109,695.00	PV09
FRAIRE MARTINEZ ROBERTO	Durango	93.86	\$ 108,877.60	PV09
MUNOZ PECINA SANDRA	Tamaulipas	113	\$ 108,819.00	PV09
ARROYOS COLMENERO GILDARDO	Chihuahua	110.96	\$ 108,539.48	PV09
VASQUEZ MARTINEZ JOSE RICARDO	Morelos	95.36	\$ 108,122.26	PV09
BUSTILLOS BUSTILLOS EMIGDIO	Chihuahua	112	\$ 107,856.00	PV09
GARCIA HERNANDEZ MARTHA CELIA	Chihuahua	112	\$ 107,856.00	PV09
LUDERS BECERRIL GUSTAVO	Sonora	112	\$ 107,856.00	PV09
MARTINEZ RIVERA TOMAS	Durango	111.5	\$ 107,374.50	PV09
VILLARREAL CORTEZ MYRTHALA PATRICIA	Tamaulipas	110.83	\$ 106,729.29	PV09
VALADEZ PADILLA EFREN	Zacatecas	110.26	\$ 106,662.29	PV09
MARTINEZ NEGRETE ARTURO	Guanajuato	110.00216	\$ 105,932.08	PV09
OROZCO XX BLANCA ARMIDA	Chihuahua	110	\$ 105,930.00	PV09
ZUMARAN CASTANEDA JOSE ALFREDO	Durango	110	\$ 105,930.00	PV09
BERLANGA ESPINOZA MARGARITA	Tamaulipas	110	\$ 105,930.00	PV09
MORALES MARTINEZ JOSE LUIS	Durango	99	\$ 105,110.00	PV09
DELGADO SALAZAR TOBIAS	Durango	108.5	\$ 104,485.50	PV09
BANUELOS MEDINA JOSE	Zacatecas	108.4	\$ 104,389.20	PV09
BUSTILLOS OLIVAS JESUS MARIA	Chihuahua	105.5	\$ 104,157.50	PV09
GOMEZ NUCAMENDI JOSE RUMUALDO	Chiapas	108	\$ 104,004.00	PV09
VAZQUEZ CONTRERAS ISMAEL	Durango	104	\$ 103,522.00	PV09
FRIESEN VOTH JOHAN	Chihuahua	102	\$ 103,514.00	PV09
ALVAREZ ARIAS JOSE	Michoacán	106.4	\$ 102,463.20	PV09
SANTA EDWIGES S.P.R DE R.L.	Chihuahua	106	\$ 102,078.00	PV09
MONTIEL RODRIGUEZ ANDRES	Sinaloa	106	\$ 102,078.00	PV09
MONREAL CASTILLO FRANCISCO JAVIER	San Luis Potosí	104.71	\$ 102,015.23	PV09
WIEBE LOEWEN CORNELIUS	Chihuahua	105.3	\$ 101,403.90	PV09
ANCHONDO RAMOS ANTONIO MANUEL	Chihuahua	98.79	\$ 100,164.58	PV09
ALBA OLAVARRIETA ARTURO	Aguascalientes	104	\$ 100,152.00	PV09
PENNER PETERS DAVID	Tamaulipas	104	\$ 100,152.00	PV09

Source: Official data from ASERCA's beneficiary lists, downloaded April 20, 2010, from http://www.aserca.gob.mx/artman/publish/article_1878.asp. According to ASERCA's website, this data was up to date as of August 18, 2009. **[Update: As of August, 2010, one year later, the author's new review of the Procampo recipient list for the spring - summer 2010 crop cycle showed that the payment ceiling for individuals was being respected.]**

The media coverage of the farm subsidy issue in February 2010 raised the question: why were the Rules of Operation being violated? (the rules had been changed not long before). Although neither Sagarpa nor ASERCA responded directly to these questions, the Director of ASERCA and the Director of Procampo did both resign (the Secretary of Agriculture had changed in the summer of 2009). However, the government's response did not include specific institutional changes that would assure compliance with the operating rules of Procampo, ASERCA and Sagarpa. Instead, the commitments made (detailed below) referred to a "clean-up" of the Procampo registry through the verification and updating of the data, the use of better technology (like geo-referencing systems) to assure that the producers receiving program subsidies really comply with the rules. In practice, however, the implementation of these plans has been quite slow, since they would be completed in 2011 at the earliest. Meanwhile, since ASERCA lacks other institutional mechanisms to assure compliance with its own rules, the agency continues to use the existing registry (with all of its associated problems), apparently driven by inertia.

Another issue of monitoring and compliance involves eligibility for Procampo payments in cases of conflicts of interest, and whether or not public officials working in agencies related to agricultural policy should be allowed to receive subsidy payments while in office (see Merino, this volume). As mentioned, because the Farmer ID is insufficient to identify individuals beyond the appearance of their name, there is no way to know with certainty whether officials are violating these regulations while in office. From an accountability perspective, the independent analysis of compliance with conflict of interest clauses is essential to holding public servants accountable for their behavior while in office.

Independent civil society policy monitoring, expressed through the *Subsidios al Campo en México* website, seeks to increase the accessibility of official data on subsidy distribution in Procampo and Ingreso Objetivo. Despite ASERCA's online public dissemination of the raw databases for its two largest programs, their size and scope make it difficult for citizens to access the data in its official format. Because Procampo alone reaches over 2 million beneficiaries each year, the Excel files for each state (especially in the Spring-Summer harvest cycle where the majority of payments are made) involve thousands and thousands of entries. Even for experts in Excel, managing information from such a large data set is highly complicated. This issue is exacerbated when one considers that the program has been operating for over 15 years.

In response, a civil society initiative called *Subsidios al Campo en México*, -- a collaborative project among NGOs, social organizations and academics -- sought to facilitate access to Procampo's recipient lists by publishing them in an easily searchable format online (available at www.subsidiosalcampo.org.mx). The website's database makes it easy to compare payments throughout the 15 years of the program's operations, in addition to distributional patterns across states. The on-line platform also includes the official databases for Ingreso Objetivo, which facilitates comparison of payment trends over time and geographically. The website also allows viewers to do searches for the names of individuals or organizations, as well as to see the detailed information of where, for what crop, the number of hectares and funded (tons in the case of Ingreso Objetivo), as well as the amounts of payments over time for each recipient listed.

This website makes accessible ASERCA's official recipient lists *exactly* as they are presented by the agency. This means that the content of the official data is not altered at all, even when there are obvious spelling and/or typographical errors. Therefore, the increased accessibility of the data through this online resource is subject to the same limitations in the official lists. It does not solve the problems of multiple Farmer ID numbers to individuals, nor does it provide any additional information about registered organizations. While greater public access to the official data creates the potential for bolstering accountability, the extent to which this website can permit precise monitoring of the distribution of farm subsidy payments over time is limited by the same factors described above.

- **Official Procampo data do not permit analysis of the degree of program coverage of grain producers.** Policymakers, observers and analysts often implicitly assume that Procampo covers all eligible producers, yet in practice, the degree of program coverage is not clear. The publicly available data on Procampo recipients does not allow for an analysis of the program's overall degree of coverage, either in terms of eligible farmers or land. Moreover, the official evaluations of Procampo do not address this issue. However, according to the research findings presented in the reports by Scott and Fox and Haight (this volume), undercoverage is significant. Both studies cite surveys showing that most smallholders lack access to the Procampo program. This pattern is due to two sets of factors. First, some producers were not registered in the first place, back in 1993-1994, for reasons that require additional research. Registration was then closed. Second, increasing numbers of registered producers are not participating, as documented by a 2006 federal audit (ASF 2008). The overall participation rate among registered producers was 91% nationally, but some states

showed much higher rates of non-participation, for reasons that are not clear.²⁸ Additional information is needed to assess the degree to which Procampo is effectively reaching its target population.

- **In spite of its limitations, the Procampo database was one of the most comprehensive sets of data about agricultural activity during the sixteen years in between the 1991 and 2007 national agricultural censuses.** The 1991 previous agricultural census was carried out before the reform of Article 27 of the Constitution, allowing the individual titling and possible sale of *ejido* land, and prior to the Procede land registration program.²⁹ The most recent agricultural census, carried out in 2007, has only recently been made public, and so far only partially (see Robles Berlanga, this volume).

The lack of a comprehensive national census for agriculture for over 15 years leaves open the question of which data was being used to make major agricultural policy decisions during that time frame. Few other government sources, at least not those that are publicly available, contain as much information as the Procampo database in terms of what crops farmers are growing, and where. However, the aforementioned problems in the quality and reliability of these databases also call into question the basis for agricultural policy decisions, if the ASERCA databases were used to inform them.

- **The Agriculture Ministry and ASERCA (with support from the Inter-American Development Bank and the World Bank) have promised to improve the quality and accessibility of data on subsidy recipients of Procampo.** The government recently announced (and budgeted) the investment of \$400 million pesos into “cleaning up” the Procampo roster. Regulations were published in September, 2009 indicating how the government intends to verify the eligibility of farmers currently enrolled in the program (DOF 2009). At the same time, large loans from the Inter-American Development Bank and the World Bank also commit significant resources to contributing to improving the quality of the data on who receives Procampo payments.³⁰

ASERCA’s previous director, Graciela Aguilar, reported that as they carry out the process of “verification”, they intend to institute a Farmer ID internal to Procampo and Ingreso Objetivo that will be more reliable than the information currently available.³¹ However, specific information on how this process of improving the Farmer ID will work has yet to be made public, other than that the process is under way and will take at least a year.

These initiatives represent potentially important steps toward improving the quality and reliability of the public data on Procampo. As civil society organizations continue to monitor Procampo’s performance, access to improved information will bolster their efforts to seek greater public sector accountability in case of Procampo farm subsidies. At the same time, public scrutiny of quality and access to official data about Mexico’s many other farm subsidy programs remains incipient.

3. CONCLUSIONS

Media coverage in 2009 and 2010 led to greater attention to Mexico’s main farm subsidy programs. Whether or not certain individuals are receiving farm subsidies, such as public officials or relatives of alleged drug dealers, is only a symptom of a larger question which should be the subject of a broader public debate. Multiple official evaluations have not determined whether the design or performance of these programs meets their goals. Moreover, the limited agendas of the official evaluations do not ask whether these goals are the ones that agricultural subsidy policy should pursue. For now, it is clear that official transparency, through the publication of recipient lists, has made a substantial contribution to the debate over farm subsidies. At the same time, the public debate is unfolding in the absence of precise and reliable information about who really receives (and concentrates) these subsidies.

²⁸ For example, in 2006 Procampo left out more than a quarter of the already-registered producers in Guerrero, reaching only 71.5%, and covered 79.1% of the registered producers in Chiapas (ASF 2008: 418).

²⁹ Procede’s full name is the Programa de Certificación de Derechos Ejidales y Titulación de Solares Urbanos (The Program for the Certification of Ejido Rights and the Titling of House Plots).

³⁰ See www.iadb.org and www.worldbank.org

³¹ Meeting held in SAGARPA’s offices with Graciela Aguilar, then Director of ASERCA and Alberto Cárdenas, then Minister of Agriculture, August 11, 2009.

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