

How do you think the green wedge and peri-urban areas support the Melbourne and Victorian community?

The Green Wedge zones (GWZs) and peri-urban areas are of critical importance to the Victorian community, in particular to Melbourne as the city prepares for its population to reach 8.6 million by 2066. According to a recently published report by Foodprint Melbourne, peri-urban areas of Melbourne's foodbowl provide 41% of Greater Melbourne's food needs and over 80% of its fresh vegetable needs. Many small-scale producers of meat and dairy have chosen to farm in the foodbowl because of significant advantages such as proximity to markets and water, access to labour and infrastructure and the suitability for certain planning zones for farming purposes. These indispensable features of Greater Melbourne are established by both Foodprint Melbourne and the Australian Bureau of Statistics. Melbourne's foodbowl is a unique asset to our state and the Victorian Planning Provisions.

Most importantly, it is key to the future of Victoria's food security but also its food sovereignty. Food sovereignty asserts the right of peoples to nourishing and culturally appropriate food produced and distributed in ecologically sound and ethical ways, and their right to collectively determine their own food and agriculture systems. Melbourne's current identity as a 'foodie city' is established upon its values for having a regional food system developed democratically by diverse social, cultural and environmental conditions. At the heart of the Victorian government's reviews such as these is the perceived or actual conflict between residential and agricultural land use. GWZs and peri-urban areas must maintain a key focus on preserving land for agricultural use. The pressures of a growing population must be dealt with in the residential suite of zones, not in Farming, Green Wedge, Rural Conservation nor Rural Lifestyle Zones. This is especially critical in the face of the negative impacts of climate change on Australia's capacity to grow food on the limited arable land we have, most of which is concentrated around cities (and indeed is the very reason cities were settled where they were). If the Government continues to allow inappropriate encroachment and urban growth into viable farm land, what will future generations have to eat? A food secure and food sovereign future depends on appropriate planning controls that preserve farm land in perpetuity.

We have identified that a food sovereign future for Victoria cannot be achieved unless the government incentivises regenerative and agroecological agricultural practices. A diverse range of agricultural land uses but mostly regenerative and agroecological small-scale production will ameliorate the conflict between high-density housing of livestock and residential uses. The Victorian government is responsible for preserving the GWZs and peri-urban areas. It carries the legacy of environmental and farmland protection laid down by the Hamer government of the late 1960s. Further erosion of strategic farmland and agricultural precincts will mean the vision of the GWZs will be lost and development will continue to cause dislocation of the agricultural communities of Greater Melbourne.

The significance of the foodbowl also has cultural and spiritual importance. As identified by the Green Wedges Coalition in their Green Wedges Charter of 2007, the GWZs include the lands of the Wurundjeri, Bunurong and Wathaurong nations. Figure 1 of the Proposed Criteria identifies the growth boundary within 100km from Melbourne's CBD. This radius then further includes the nations Djadjawurrung to the north-west and Taungurong in the north-east. These areas are of infinite value to indigenous Australians and therefore to all its past, present and future. The prosperity and social cohesion of Victoria's community rests upon how Victoria's government values these lands (never

ceded) that now sustains one of the world's most liveable cities. Not only does this review provide an opportunity to re-evaluate the importance of strategic agricultural land for regenerative agriculture, but also it will be a blueprint for establishing a planning strategy which prioritises social and cultural awareness in its approach to land management. We welcome the Victorian government's commitment to permanently protect strategic agricultural land in the GWZs and peri-urban areas of Melbourne.

KEY SUMMARY POINTS:

1. Preserve the well-established and historical foodbowl for Greater Melbourne and surrounds.
2. Support and cultivate Victoria's food and agricultural identity.
3. Reduce land use conflict by promoting and incentivising a diverse range of agricultural land uses including regenerative agriculture and agroecology.

What do you see as the biggest challenges for agricultural land management in the green wedge and peri-urban areas of Melbourne?

We have identified that the key challenges for agricultural land management in the GWZs and peri-urban areas of Melbourne are as follows:

1. ending the loss of agricultural land and subsequent dislocation of farming communities;
2. designing sustainable, fair and ecological water use, treatment and distribution policies;
3. managing land use conflict between land uses on the urban fringes;
4. avoiding the imminent public health and environmental impacts of high-density animal confinement practices;
5. reducing the remaining and expanding intensive agricultural industries that dominate the urban fringes while supporting food production;
6. overcoming ongoing land-use biases that have developed in the planning scheme towards low-density livestock practices;
7. bridging land use planning and food sovereignty in Victoria's planning scheme; and
8. encouraging long-term employment incentives across the agricultural industry including in processing facilities.

This list is by no means exhaustive. As an established voice for small-scale producers, processors, chefs, eaters and supporters of food sovereignty, AFSA has devised a number of solutions to these challenges. Until Victoria's Planning for Sustainable Animal Industries (PSAI) review was implemented, the link between land use planning and food sovereignty was poorly understood in Victoria. Our keen engagement as a stakeholder to PSAI contributed to Victoria's current commitments towards protecting artisanal producers and low-density producers in Victoria. In furtherance of these advancements, the appropriate response to this review should involve

continuing to undo land-use biases that have developed towards low-density, pasture-based livestock production amongst local governments and decision-makers.

We hope to assist DELWP in doing so by continuing to be involved in the proposal drafting stages to follow this consultation. DELWP must recognise the need to reduce risky, high-density practices while incentivising small-scale production across the strategic areas. Higher-density practices attract and exacerbate land-use conflicts between urban and rural land users. This has been demonstrated by an abundant number of tribunal matters in VCAT relating to the impacts of high-density agriculture on community amenity. Structurally different to high-density farming, small-scale, regenerative and agricultural practices reduce land-use conflict while increasing agricultural production in food sovereign ways.

As the Department is well aware, there is a growing area of scientific literature establishing the dangers of high-density housing of animals in confined spaces on the grounds of economies of scale. Research has shown that this results in bacterial and viral acute infections within the very environments which such practices intend to evolve greater transmissibility and resistance (Rob Wallace 2016). The sheds ostensibly built to keep disease out are instead the environments in which pathogenic species flourish. Highly industrial models promote highly pathogenic strains of avian influenza. H7N4 and H7N7, for instance, have been documented on large broiler and layer poultry operations in Victoria and Queensland since the 1970s. An on-site increase in the virulence of an avian influenza H7N4 strain from low to high pathogenicity was documented on a large commercial broiler-breeder operation of 128,000 birds. (Rob Wallace 2016). It is the concentration, scale, and throughput of animal production that are driving the new disease ecology, selecting for the evolution of greater deadliness, and increasing the geographic extent of pathogen transmission. Industrial pigs have repeatedly suffered disease outbreaks in Australia, including atrophic rhinitis, *Actinobacillus pleuropneumoniae*, *Haemophilus parasuis*, *Pasteurella multocida*, porcine circovirus 2, and swine flu H1N1 (2009). Many such acute pathogens can persist, and spread across multiple regional farms, only under intensive industrial models of production. (Rob Wallace 2016).

Remaining and expanding intensive agricultural industries dominate landscapes on the urban fringes and effectively cause further conflict between urban and rural landscapes. Through land use planning, the Victorian government should guide development in the rural and peri-urban zones in pursuit of common goals and values, such as nutritious and clean food products, environmental protection and sustainable liveable communities with a sense of place.

Do you understand why protecting agricultural land around Melbourne for food production is important?

I understand

Proposed criteria

Please review the [proposed criteria](#) for assessing whether agricultural land is strategic.

Have we got the right criteria?

Regulatory expression in the Proposed Criteria will act as a core framework of the operating planning schemes to come. AFSA does not accept the Proposed Criteria. Firstly, we reject the notion

that land capability for intensive, soil-based agriculture can provide strategic solutions to identifying agricultural land. Land capability relies on a reductive understanding of agriculture and fails to capture regenerative practices that have been shown to harness productive and ecologically-sound techniques to improve farming on marginal land. We highlight that this criteria precludes marginal land from consideration for protection. Small-scale farmers across Australia are already engaged in agroecological practices that provide nutritious food for their communities while caring for animal welfare, the soil and all other components of their local ecosystems.

The Department would be well-advised to refer to and continue developing data on the growing number of artisanal, small-scale producers in Victoria. We further urge DELWP to update their understanding of pasture-based soil management and other regenerative practices. A major criteria of this reform should not be reduced to current productivity and capability of soils, but more focused on the potential for farming systems that sequester carbon dioxide as a way to stabilize soil carbon. Regenerative practices, as advocated by the likes of Charles Massey, Paul Hawkins (author of the Drawdown) and the Regenerative Agricultural Alliance (of Southern Cross University), can make a significant contribution to climate change solutions while improving agricultural productivity. Additionally, certain biases towards farming on slopes is a contested area within the planning scheme. However, if a measurement of regenerative capability were to be included as a progressive criterion of these reforms, then the issue of slope can be resolved in a number of innovative ways.

Secondly, while we support the inclusion of criteria for Existing Land Use and Integration with Industry, we emphasise the need to support vital industries such as abattoirs, grain mills, and processing facilities such as on-farm and cooperative-managed boning rooms. While securing small-scale, low stocking density farming in Victoria, our state planning regulations should also support mobile infrastructures, which in turn will improve direct sales of produce to communities (Community-Supported Agriculture). The lack of access to abattoirs impacts not just animal welfare, but also prohibits new farming ventures from getting started in the first place. Large industrial abattoirs with a focus on export are increasingly moving away from accepting small private kills, and in many cases the Halal certification requirements of export have led to a decline in the number of large-animal abattoirs processing pigs. Where farmers lose opportunities to process and distribute their produce, it becomes increasingly difficult to provide local food to rural and regional communities. In the more remote parts of Australia where many livestock are grown, mobile abattoirs offer a feasible alternative to process livestock without prohibitive distance and cost to producers, but regulations in most states have prohibited the use of mobile abattoirs due to many overlapping jurisdictions of food safety and environmental regulators. Community responses to our campaigns and to AFSA's Slow Meat Symposiums in Daylesford have reinforced to our organisation that meat producers are suffering from the acute lack of local abattoirs throughout our region and Australia-wide. Local communities are demanding that industrial assets are made accessible and less oriented towards export commodity logistics. Our members want all livestock producers to have access to processing facilities and to have the confidence that they can only have when they have more control of the supply chain. Producers who operate further away from infrastructure assets can still be managed productively and ethically. For example, regional cooperative facilities built by local communities supported by planning regulations can reduce the negative impacts of access and control for producers in regional and rural locations. Hepburn Shire is currently working with the community in a project to build a new regional, cooperatively-owned abattoir. Taranaki Farm of Woodend is also working to provide a real solution to the problem of access in Victoria for poultry

producers, who now can only access the one processing facility left, Star Abattoir. While such a precarious situation should never have developed in Victoria, the government can still work to support regenerative, ethical, pasture-based farming and the on-farm micro facilities and community-controlled facilities desperately needed. Thirdly, we reject the Exclusion factor, 'Limited size and extent of area'. As the Department is well aware, small-scale farming (including but not only market gardens) should be encouraged and incentivised to populate peri-urban agricultural land.

The Department has not specified what dimensions are referred to with regard to "limited" size and extent of area. We believe that sustainable agricultural production is dependent on securing small-scale production in the GWZs and peri-urban areas. AFSA supports the recommendations of Foodprint Melbourne as a whole. We support their response to the Proposed Criteria 'Water Access' and 'Resilience and Adaptability'. AFSA reiterates that "strategies to increase the resilience of the city's food system will only be available in future if a precautionary approach is adopted now to retaining the city's farmland and promoting the viability of its farmers."

How important are the proposed criteria?

Land capability - Somewhat important

Water access - Very important

Resilience and adaptability - Very important

Existing land use and integration with industry - Very important

What local or regional factors should we know about when assessing whether agricultural land is strategic?

DELWP should further consider:

1. the potential for increased productivity measured by regenerative capability of soils and diverse landscapes (especially through pasture-based animal agriculture);
2. changing climatic conditions;
3. the productivity of marginal and small-size lots;
4. soil characteristics and regenerative pasture management;
5. diverse methods of housing and feeding, including the type of buildings and materials used, space allowance, ground cover;
6. access to animal feed;
7. the potential for cooperative-owned processing facilities, micro-abattoirs and boning rooms and relevant meat regulations to respond; and 8. the growing demand for regenerative, localised food production.

The proposed criteria will effectively determine whether agricultural land is strategic now and in the future.

Do you agree with the above statement?

Strongly agree

In the future strategic agricultural land will be recognised and protected in the planning system. The outcomes the Victorian Government are hoping to achieve by protecting this land through the planning system are:

Provide confidence to the agricultural industry to establish and grow.

Provide flexibility for agricultural businesses to expand, adopt new technology and respond to changing markets and consumer preferences.

Protect the 'right to farm'.

Ensure separation from sensitive uses and minimise risk of land use conflict.

Prepare for climate change by safeguarding areas with recycled water access and high resilience.

What do you want the planning response (to protect strategic agricultural land) to achieve?

We submit to the Department that the key goal of the planning response is to protect as much land near cities for growing food as possible. Foodprint Melbourne have highlighted this in their submission and we endorse their recommendations.

Is there any additional feedback or input you would like to provide?

We further make the case for agroecological farming in Victoria: Agroecological farming is the application of ecology to the design and management of sustainable agroecosystems . Agroecological farmers favour long-term planning strategies that are flexible and can be adjusted and re-evaluated through time. They aim to diversify production on farm, which creates resilience ecologically, and for farmers and eaters in the face of climate change, but also for shifting market prices . At the core of agroecology is the idea that the type of farming undertaken must be appropriate for that particular environment. This farming philosophy has been gaining an increasing following globally as farmers everywhere are beginning to seek out more sustainable farming methods. The concept has been endorsed by the Food & Agriculture Organisation of the UN (FAO) as a means to feed growing populations sustainably. The aim is to design complex and diverse agroecosystems for all the individual parts to eventually support and sustain each other to prevent the outbreaks of pests and disease common in mono-culture systems. In practice this means incorporating livestock, grains and plants in ways that minimise external inputs by re-using waste on the farm, spreading out the risk of relying on just one crop, conserving water and looking after the soil .

What is your relationship to the project?

We are an incorporated association which advocates for our members, including farmers, processors, eaters, community groups and community organisations, many of whom own land in the peri-urban and GWZs.

What region of the green wedge and peri-urban areas around Melbourne do you

live/work/own/have an interest in?

All the peri-urban and green wedge areas around Melbourne