



AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE

Submission on the Independent Review of the Agvet Chemicals System

26 February 2021

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Addressed to https://haveyoursay.awe.gov.au/agvet-chemicals-regulatory-reform/survey_tools/online-form-draft-report

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About the Australian Food Sovereignty Alliance (AFSA)

The Australian Food Sovereignty Alliance (AFSA) is a farmer-led civil society organisation made up of organisations and individuals working together towards a food system in which people can create, manage, and choose their food and agriculture systems. AFSA is an independent organisation not aligned with any political party. We have around 700 farmer, individual, and organisational members.

AFSA provides a balanced voice to represent farmers. We connect small- and medium-scale Australian farmers for farmer-to-farmer knowledge sharing, work with all levels of government for scale-appropriate and consistent regulations and standards for agriculture, and advocate for fair pricing for those selling to the domestic market.

We are part of a robust global network of civil society organisations involved in food sovereignty and food security policy development and advocacy. We are members of the International Planning Committee for Food Sovereignty (IPC), La Via Campesina – the global movement of peasant farmers, and Urgenci: the International Network for Community-Supported Agriculture, and work regularly with Slow Food International and many of its Australian chapters. We also support the Australasian representative on the Civil Society Mechanism (CSM), which relates to the UN Committee on World Food Security (CFS).

Our vision is to enable regenerative and agroecological farming businesses to thrive. Australians care now more than ever about the way their food is produced, including its social and environmental impacts. Food produced on small- and medium-scale regenerative farms is increasingly in demand, and government is bound to heed changing community expectations and facilitate and encourage the growth and viability of regenerative agriculture, thereby protecting the environment and human and animal health.

As a key stakeholder and representative body of small- and medium-scale producers Australia-wide, AFSA welcomes the opportunity to submit on the independent review of the agvet chemicals regulatory system.

Context

AFSA thanks the panel for the opportunity to submit on its draft report, following the feedback AFSA provided (in a joint submission with Gene Ethics) in October 2020.

We reiterate all of the points made in our October 2020 submission, and provide further information below regarding our key concerns with the draft report and the review in general:

1. Lack of consultation with Aboriginal and Torres Strait Islander Peoples
2. Preference for continuing the current rate of agvet chemical use
3. Impact and lack of protection of regulatory changes on small-scale farmers

Lack of consultation with Aboriginal and Torres Strait Islander Peoples

We note the absence of any mention of Aboriginal and Torres Strait Islander Peoples in the draft report. There is no acknowledgment that decisions are being made about the regulation of chemical use on Aboriginal and Torres Strait Islander Peoples land, and there is no apparent consultation with individuals, or Aboriginal and Torres Strait Islander controlled organisations. AFSA would welcome information on whether the Panel has sought the views of Indigenous peoples as part of its review.

Continuing our Rate of Chemicals Use

The routine use of pesticides and veterinary chemicals in farming is a relatively recent phenomenon, arising during the Green Revolution from the 1950s onwards, and yet it is now such accepted practice that a review such as this does not even ask *whether* we should continue our rate of chemical use, but instead asks *how to make chemicals more readily accessible*. Policy to increase the accessibility of chemicals is incoherent with discourses taking place in global governance processes. Notably, there was only one reference to the United Nations in the 279 page draft report, highlighting a lack of review of global best practice and policy recommendations on the use of agvet chemicals.

To summarise some of this international advice:

The World Health Organization and Food and Agriculture Organization of the United Nations, **International Code of Conduct on Pesticide Management** states ‘Governments, with the support of relevant international and regional organizations, donor agencies and research funds, should encourage and promote research on, and the development of, alternatives to existing pesticides that pose fewer risks such as biological control agents and techniques; nonchemical pesticides and pest control methods; pesticides that are of low risk to human and animal health and the environment, that as far as possible or desirable, are target-specific, and that degrade into innocuous constituent parts or metabolites after use.’ (p.10)

In 2019, the FAO released the **State of the World’s Biodiversity for Food & Agriculture Report**, which highlights the problems of ‘pollution and overuse of external inputs,’ and calls for improved monitoring of recognised threats to biodiversity for food and agriculture, of which agvet chemicals are one such threat.

The **2019 report by the High Level Panel of Experts on Agroecological and Other Innovative Approaches for sustainable agriculture** calls for ‘strengthening the regulations on the use of chemicals harmful for human health and the environment in agriculture and food systems, promoting alternatives to their use and rewarding practices that produce without them.’

In that same year, The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) released **The Global Assessment Report on Biodiversity & Ecosystem Services**, providing evidence that ‘Harmful economic incentives and policies associated with unsustainable

practices in [...] agriculture (including fertilizer and pesticide use), [and] livestock management [...] are often associated with land-use change and overexploitation of natural resources[...]. Vested interests may oppose the removal of subsidies or the introduction of other policies. Yet policy reforms to deal with such causes of environmental harm offer the potential to both conserve nature and provide economic benefits, including when policies are based on more and better understanding of the multiple values of nature's contributions.'

The UN's Convention on Biological Diversity is currently drafting a post-2020 **Global Biodiversity Framework (GBF)** to replace the failed Aichi Biodiversity Targets. You can see the Zero Draft on the CBD website, where draft Target 6 calls for the reduction of biocides, and Target 17 aims to 'by 2030, redirect, repurpose, reform or eliminate incentives harmful for biodiversity, including a reduction in the most harmful subsidies, ensuring that incentives, including public and private economic and regulatory incentives, are either positive or neutral for biodiversity'. Australia has committed to the earlier Aichi Targets and now the GBF process, but we see little awareness of these aims in the recommendations in this review.

Vested Interests

Furthermore, we would like to especially highlight the point about vested interests, as we note that CropLife is cited no less than 14 times in the report, and represents the interests of some of the world's biggest agvet chemical manufacturers. Can there be a more obviously vested interest than chemical companies advising an 'independent review' on the regulation of chemicals? As the world faces unprecedented losses of biodiversity, CropLife's website tells us they are here to help wage a war on nature. To quote: '...food crops compete with up to 30,000 species of weeds, 3,000 species of nematodes (microscopic worms) and 10,000 species of plant-eating insects, as well as viruses, fungi, mites and mice. Against these foes, as well as an increasingly volatile climate, our farmers are tasked with growing enough food, feed and fibre to serve a booming population. They need all the help they can get.' End quote – and CropLife are here to help – by selling them biodiversity-destroying solutions. When we read the Panel's enthusiasm for more 'co-regulation' with industry, the fox in the henhouse comes strongly to mind.

Antimicrobial resistance

We also want to highlight the use of antimicrobials in livestock production, and the rise of antimicrobial resistance. We welcome the acknowledgement of the issue of AMR in the report, and we also welcome Recommendation 19 to improve surveillance of chemical use. We urge the Panel to go further specifically in regards to the use of antimicrobials and require more thorough reporting of the use of antibiotics. Our livestock farmer members have noted that they are subject to reporting requirements, and are aware that they only have to report any medicines administered that would not meet a withholding period when we send animals to the abattoir. That is, there is no routine reporting requirement for the administration of antibiotics, and we recommend strengthening these to require reporting of all antibiotic administration.

The FAO's Committee on Agriculture has urged countries 'to take action to continue the development of sustainable food production systems taking into consideration their social, economic and environmental dimensions, in order to reduce the risk of diseases, prevent the unnecessary use of antimicrobials, including the phasing out of antimicrobials as growth promoters and promote good animal husbandry management, biosecurity and biosafety.' We urge the Panel to include this recommendation to phase out antimicrobials as growth promoters in its advice to Government.

Finally, the UN Committee on World Food Security (CFS) very recently released its draft **Voluntary Guidelines on Agroecological and Other Innovative Approaches for Sustainable Agriculture**. In it, the CFS reminds us that 'Over 1.3 billion people rely on degrading agricultural land, and globally, 33% of soil is moderately to highly degraded due to erosion, nutrient depletion, acidification,

salinization, compaction and chemical pollution. Ruptures to the interlinkages between human and planetary health compromise the well-being of both biodiversity and people.’

The Draft Report makes frequent mention of ‘social licence’ and the need to educate the community about the importance of agvet chemicals. AFSA respectfully submits that the public and the global scientific community are well versed in the evidence supported dangers of over-use of chemicals, and the inherent vulnerabilities of monocultures of crops or animals. There are major problems in the very way we farm – farming against nature rather than with it. So long as CropLife is a key source of information on how best to manage the risks of chemicals in agriculture, we will never address these deeper issues so well understood by the various governing bodies addressing agriculture, food, and health within the United Nations, and intrinsically understood by First Nations.

Impact of regulatory changes on small-scale farmers

AFSA also has a strong interest in the regulatory changes that will come out of this review and the impact they may have on our farmer members, many of whom farm organically without reliance on chemical inputs. The Draft Report does not detail what regulatory changes will be required, but we expect there to be further public consultation when these regulatory changes are raised so they can be scrutinised and debated.

In the meantime, the Panel’s vision statement suggests the first aim for an improved regulatory system is to enhance and protect health, but it links this aim to “improving access to safe products and uses”. We would suggest this secondary aim sits in direct conflict in the case of our farmer members who refrain from chemical and pesticide use in their farming practices. The more chemical substances made available as a result of “intelligent deregulation” (which are the panel’s words not ours), the greater the incursion risk to neighbouring farms whose business models eschew chemical applicants. Is deregulation actually an intelligent move at all when health and safety is concerned? To truly enhance and protect health, shouldn’t it be harder to obtain and use chemicals, not easier?

The rise of regenerative and agroecological farming means these types of incompatibilities will only increase. It brings to mind the sorts of legal complications that arose in the now infamous instance of West Australian farmer Steve Marsh. Mr Marsh lost his organic certification when his neighbour’s GM canola crops extended onto his property. Our question for the panel is where will the right to protection from excessive chemical use on neighbouring farms be enshrined given the current law is inadequate to protect one farmer’s practices from another’s? In conclusion, we would point out that this question is especially important in light of the fact that the chemical companies have demonstrated they are prepared to fund the legal defence costs of the users of its products? ¹

Key Recommendations

In light of our key concerns, AFSA proposes the following recommendations to the Panel:

1. AFSA welcomes information from the Panel on the consultation process with Aboriginal and Torres Strait Islander Peoples throughout the review process
2. The Panel shall review global best practice and policy recommendations on the reduction of agvet chemical use, to address the current incoherence, such as with *The International Code of Conduct on Pesticide Management*, and lack of recognition of Australia’s commitments to

¹ <https://www.weeklytimesnow.com.au/agribusiness/cropping/monsanto-contributed-to-the-legal-defence-of-wa-farmer-sued-by-his-organic-farmer-neighbour/news-story/c06e39b1ee67f196079943d399cc78aa>

the Aichi Targets and ongoing Global Biodiversity Framework process.

3. We urge the Panel to go further, specifically in regards to the use of antimicrobials and require more thorough reporting of the use of antibiotics.
4. We urge the Panel to include the FAO Committee on Agriculture's recommendation to phase out antimicrobials as growth promoters, in its advice to Government.
5. We request the Panel develops a clear plan for further public consultation for proposed regulatory changes, so they can be analysed from the perspective of small-scale, agroecological and regenerative farmers.

AFSA thanks you again for the opportunity to submit on the review of the agvet chemicals session and looks forward to further meaningful, collaborative consultation on the matters we have raised above.

About 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.”²

The core of food sovereignty lies in the following principles:

- Food is a human need and a basic right, rather than a commodity.
- Food systems should be democratically constructed, responding to diverse social, cultural and environmental conditions.
- Food systems should be based on a strong commitment to social justice: for farmers, food system workers, and the most vulnerable members of our society who experience food insecurity.
- Resilient food systems require long-term environmental sustainability, transitioning away from dependence on fossil fuels and chemical inputs.
- Resilient and sustainable food systems will be more localised and regionalised.
- Trade in food and agricultural products can enhance economic and social well-being but should be conducted on the basis of international solidarity, respecting and not undermining the food sovereignty ambitions of other peoples and countries.³

² The Australian Food Sovereignty Alliance, <<https://afsa.org.au/?s=food+sovereignty+>>.

³ Patel, R. (2009). What does food sovereignty look like? *Journal of Peasant Studies*, 36(3), 663-671.