



AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE

Submission in relation to the Identification of Leading Practices in Ensuring Evidence-Based Regulation of Farm Practices that Impact Water Quality Outcomes in the Great Barrier Reef

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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, particularly in this case some of the otherwise voiceless small-scale farmers within the reef catchment regions, AFSA welcomes the opportunity to submit on the identification of leading practices in ensuring evidence-based regulation of farm practices that impact water quality outcomes in the Great Barrier Reef.

Context

On 19 September 2019 the Queensland Parliament passed the *Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Amendment Bill 2019* (the Bill). The associated Reef Protection Regulations are due to come into effect on 1 December 2019 with a planned three year rollout period applying.

The Reef 2050 Long-Term Sustainability Plan

The Reef 2050 Long-Term Sustainability Plan (“2050 Plan”) is Australia’s overarching framework for protecting and managing the Great Barrier Reef from 2015 to 2050.¹ The 2050 Plan contains seven themes:

- Ecosystem health
- Biodiversity
- Heritage
- Water quality
- Community benefits
- Economic benefits
- Governance

AFSA notes that Queensland’s Palaszczuk Government made significant election commitments when coming into office through its Saving the Great Barrier Reef policy. These commitments included new ports legislation to manage port development and dredging, reinstating vegetation clearing laws, addressing climate change and improving water quality.

The Palaszczuk Government also committed to the Reef 2050 Plan and its overarching themes above. AFSA submits that while the restrictions being placed on current and future small-scale regenerative farmers by the Bill at first glance do go some way towards addressing water quality for large input farmers, the obvious benefits from the other 2050 Plan themes of ecosystem health, biodiversity, heritage, water quality, community benefits, economic benefits and governance have been overlooked.

Small and medium scale regenerative farming offers benefits against every single theme of the 2050 Plan. Such farming practices need to be carved out of a regulatory regime that threatens to impose an additional regulatory burden and compliance cost or make the whole exercise too complex and cost prohibitive for new agroecological enterprises.

The Queensland Government has identified agriculture as one of the four pillars of the State’s economy in its 2040 agricultural strategy², however the Bill is truly incongruous to this strategy.

¹ <http://www.environment.gov.au/marine/gbr/long-term-sustainability-plan>

² “Queensland’s agriculture strategy – A 2040 vision to double agricultural production” Department of Agriculture, Fisheries and Forestry

The Great Barrier Reef Water Science Taskforce Final Report

In 2016 the Great Barrier Reef Water Science Taskforce delivered its final report.³ The Report made recommendations upon which the bulk of the Bill has been based. Recommendation 5, specifically 5.2 and 5.3⁴ make mention of offering incentives for improved practises and having minimum standards that have been set in consultation with affected industries. However, this does not appear to have been addressed in the Bill, and there has been no consultation with small scale regenerative farmers, only the “big players” such as QFF, Canegrowers, the MLA (noting that, on the whole, AFSA’s members do not align themselves with these larger industry bodies).

The Queensland Government’s response to recommendation 5.2 in particular makes mention of addressing the most polluting practises, but reducing regulatory burden for the best performers:

*“5.2/5.3 The Queensland Government will work with industry to develop farm scale minimum standards to **target the most polluting practices while at the same time reducing regulatory burden for the best performers.** It also supports the intent of gathering finer scale data to help focus efforts towards high risk areas and support regulations. The Queensland Government agrees that targeted regulations introduced in progressive stages may continue to drive further load reductions over time.”⁵*

It appears however that when it has come to drafting the Bill, all farming has been tarred with the same brush. Nowhere, for instance, does there appear a fast-track approval process for small scale, low-impact farmers. Instead, all new or changed activities are prescribed Environmentally Relevant Activities (ERA’s) with which classification comes increased regulatory and compliance costs.

How the proposed changes will affect AFSA’s farmer members

AFSA is categorically supportive of reef protection measures. The Great Barrier Reef is a significant environmental asset from both an ecological and economical point of view. However, AFSA maintains it is imperative to ensure that any regulatory response is proportionate, fair and achievable. We acknowledge that this is not an easy task when juggling the seemingly competing interests advocated by the various industrial, agricultural, scientific, political and environmental advocates. The alarming clash of science around this topic does not elicit confidence in the direction the Queensland Parliament has taken.⁶

³ <http://www.gbr.qld.gov.au/taskforce/final-report/>

⁴ 5.2 Incentives to continuously improve practices should be complemented by staged regulations that should:

- improve existing minimum regulated standards (for example for urban, stormwater and point source) over time
- establish minimum standards across all agricultural industries to address sediment and nutrient pollution
- mandate the provision of farm level yield data, nutrient and other relevant data across all agricultural industries
- consider progression to other approaches, including farm-based caps, if other stages are not successful within 5 years

5.3. Minimum standards must be set in consultation with affected industries and have explicit regard to the cost and benefits of those standards.

⁵ “Queensland Government response – Great Barrier Reef Water Science Taskforce Final Report – August 2016”

<https://www.qld.gov.au/assets/pdf/file/taskforce-final-report-response>

⁶ “Queensland Labor punishes farmers to placate UNESCO” (News Weekly October 19 2019), and article that refers to, for instance, interviews with AgForce chief executive Michael Guerin who previously told The Australian: “Where is the logic? The reefs adjacent to Cape York, where [voluntary] sediment and nutrient targets were met, were the worst affected by recent bleaching events.”

For its part, as a representative of small and medium scale agroecologists in the area, AFSA has concerns that the increased regulatory burden will significantly disadvantage them and in turn lead to the potential decrease in local, high-quality food. This would be a particularly inappropriate outcome considering the fact our farmers actively seek to minimise the environmental footprint of their farming practises and actually regenerate the land rather than deplete it.

It goes without saying that any additional regulation adds to our farmers' administrative workload. Being small scale means our farmers do not necessarily have resources to meet additional regulatory requirements, on both a financial and time-basis level. Any fees associated with regulatory change must be scale-appropriate so that our farmers are not unfairly disadvantaged.

Increased regulation risks reducing access to fresh, local produce to the detriment of public health

The public health system in Australia is under pressure due to an epidemic of diet-related disease. One of the most important ways to counter the effects of poor dietary options is to ensure the public have access to high-quality fresh meat, vegetables, fruits and grains. Requiring farms to comply with a new regulatory regime without a clear, unequivocal reason for doing so will make enterprises more difficult to start and harder to run.

It should be noted that according to the IBISWorld *Fruit and Vegetable Processing - Australia Market Research Report*, domestic demand for processed fruit and vegetables has trended down in recent years, and Australian fruit and vegetable processors are forecast to face greater regulatory restraints.⁷

As a signatory to the United Nations (UN) Covenant on Economic, Social and Cultural Rights, Australia is bound to ensure the full enjoyment of the universal human rights it outlines, include the right to adequate food.⁸ That obligation includes *respecting, protecting, facilitating and providing access* to adequate food to ensure food security and healthy livelihoods.⁹

Australia is currently behind on providing access to fresh food to Australians. Indeed, the Department of Agriculture has set out a number of aspirational agricultural and food policies and has set up numerous task groups in order to improve policymaking. Increasing the burden of regulation on existing producers will only add to factors which may result in their ceasing production.

Guerin told the North Queensland Register: "There isn't even any basic monitoring in place to ensure the measures claimed to protect the reef are actually effective." Also marine scientist Professor Peter Ridd, who was found to have been unlawfully dismissed by James Cook University for criticising a colleague's claims about climate change, has been a vocal opponent of the new laws. He told The Australian that farm chemicals are not affecting the reef.

⁷ <https://www.ibisworld.com.au/industry-trends/market-research-reports/manufacturing/food-product/fruit-vegetable-processing.html>

⁸ Article 2 of the International Covenant on Economic, Social and Cultural Rights (ICESCR).

⁹ United Nations Human Rights Office of the High Commissioner, Special Rapporteur on the Right to Food, <<http://www.ohchr.org/EN/Issues/Food/Pages/FoodIndex.aspx>>.

Risk: scale matters

AFSA believe that government policy often fails to capture the model of most small- medium-scale farms.

The costs to the community of a farm regulatory system that mandates onerous administrative burdens would be significantly greater than any benefit. Many small farms start in horticulture for instance because of the low barriers to entry. Increasing regularity barriers into horticulture production across the reef region would prohibit the growing movement of young people returning to farm in small-scale agroecological ways, and in turn inhibit communities' access to fresh, local food produced in ecologically-sound systems.

The UN Declaration on the Rights of Peasants and Other People Working in Rural Areas asserts that: 'States shall take all appropriate measures to ensure that their rural development, agricultural, environmental, trade and investment policies and programmes contribute effectively to protecting and strengthening local livelihood options and to the transition to sustainable modes of agricultural production.' It further asserts that 'States shall stimulate sustainable production, including agroecological production, whenever possible, and facilitate direct farmer-to-consumer sales.' (UNDROP, Article 16.4)

A better way

Our farmers in the reef region care for the land and the waters. They shun high input agriculture and monitor their soil quality as they are fully reliant on soil health for their farm produce to grow and thrive. Holistic farming practices produce healthy animals and soil, which in turn improve water quality outcomes for the reef.

As an alternative to en-masse reef regulation, and recognizing that a one-size-fits-all approach smacks of "tarring all farmers with the same brush", if farmers were encouraged and even financially assisted to implement regenerative techniques into their land management, there would potentially be far less pressure on the Queensland Government to strengthen reef protection regulations.¹⁰ A carrot, rather than a stick, approach ultimately could lead to far better outcomes for both the reef and farmers than an extra layer of regulatory complication will.¹¹

AFSA trusts that Senate Standing Committee Inquiry will be taking all the above into account. We would truly appreciate the opportunity to meet and discuss our concerns further so we can be assured that all farming interests, of all shapes and sizes, are being considered in the development of reef regulation reforms.

¹⁰ "Minerals, mulch and microbes hold reef, drought solutions" The Weekly Times, May 8, 2019

¹¹ For instance, The Reef Trust – Great Barrier Reef Foundation could be utilised and enhanced to support individual farmers who are actively seeking or utilising reef-protection solutions in their farming practices. Note the admirable work of the Central Queensland Soil Health Systems farmer collaborative in this respect: www.cqshs.farm

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.”¹²

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.¹³

¹² The Australian Food Sovereignty Alliance, <<https://afsa.org.au/?s=food+sovereignty+>>.

¹³ Patel, R. (2009). What does food sovereignty look like? *Journal of Peasant Studies*, 36(3), 663-671.