



AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE

Submission on the Property ID Reforms

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Prepared by

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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 draft principles for property identification arrangements.

Context

The proposed Property Identification (Property ID) reforms have stemmed from Australia's Intergovernmental Agreement on Biosecurity review. In the associated Agriculture Ministers' statement it has been noted that:

“the challenges facing our national biosecurity system continue to grow as the volume and complexity of global trade and travel increases. However, together we are committed to building a smarter biosecurity system.

To achieve this, we will focus on a number of priority areas as identified by the [2017 report Priorities for Australia's biosecurity system: an independent review of the capacity of the national biosecurity system and its underpinning intergovernmental agreement], by our governments and by key stakeholders, to better prepare and respond to pests and diseases, increase biosecurity awareness across the community, enhance our capability to manage environmental biosecurity and better manage risk through research and innovation.”

One of the priority areas for focus appears to have been derived from a report recommendation, namely:

“progressing a nationally consistent system for the allocation and use of property identification codes across the animal and major plant production sectors”.

AFSA became aware of the proposed Property ID reforms when a member read an article in Farm Online¹. Without this fortuitous discovery it is questionable whether we would have known about the proposed changes at all. Whilst we are grateful that there is an opportunity to make submissions, we do question whether any industry consultation has occurred earlier in the piece, as we would have appreciated an earlier opportunity to consult to ensure that scale-appropriateness was being taken into account in developing the reform principles.

The recently adopted UN Declaration on the Rights of Peasants and Other People Working in Rural Areas asserts the right of small-scale farmers to participate in 'decision-making processes on food and agriculture policy' (UNDROP, Article 15.4). As stakeholders and representatives of farmers and eaters, we seek further engagement in the making of all new rules and regulations in relation to property IDs.

How the proposed changes will affect AFSA's farmer members

AFSA recognises that property ID rules already exist on a State by State for livestock, but has concerns that requiring similar identification for all other types of farming (notably grains, horticulture, plant nurseries, orchards) will have negative impacts.

AFSA wholeheartedly supports provenance and transparency in food production which we note is a current focus of our agriculture ministers in proposing the property ID reforms. We do have concerns however that property ID measures on the scale anticipated by the reforms are likely to have burdensome and potentially costly impacts on small scale producers who already have direct accountability in their supply chain. This is because our farmers literally either stand in front of

¹ <https://www.farmonline.com.au/story/6407239/have-your-say-mandatory-traceability-for-cropping-and-hort/>

their customers at markets, they sell their produce at farm gates, or they have strong relationships with their customers through distribution models such as Community Supported Agriculture.² Any and all food risks can be addressed within these distribution systems quickly and effectively.

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. It is not clear from the principles whether there are any fees associated with the proposed property ID's, but given there are in the livestock sector one would assume there will be. Any such fees would need to be scale-appropriate so that our farmers were not unfairly disadvantaged.

AFSA is concerned with the practical aspects to the property ID reforms and the link to individual "pieces" of produce from farms. Will there be a requirement to label produce and animals with the property ID in order to link each product/animal to the property from whence it has come? We understand this is largely manageable in the case of livestock such as cattle, sheep and goats where electronic ID tags are attached to the animals' ears (though we query how a similar identification process could be effected with poultry and feral animals harvested for processing such as goats). Of course it goes without saying how impractical it will be to label horticulture products like lettuces and tomatoes.

Will there be a threshold before such identification is triggered? For instance, take the case of a hobby farmer selling a few dozen eggs from their farm gate each week – will their property require an ID and how is that ID proposed to be associated with their small flock of hens? Will the hens require leg bands? Will the egg cartons require labelling with the property ID? It would be disappointing if the proposed new requirements stifled such entrepreneurship (especially as many children from farming families start out in this way).

In a similar vein we note draft principle 7 requires that "data is to be updated regularly". We question the degree of information required and how often one would have to change or update registrations as crops are altered or seeds raised. In the case of many small-scale market gardens for instance, growing hundreds of small product lines and being highly flexible and variable to react to customer demand and climate challenges, it could be overwhelmingly burdensome to comply with the data requirements.

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 vegetables, fruits and grains. Requiring farms that produce horticultural products to comply with a new property ID regime will make enterprises as urban micro farms, community-supported agriculture, food buyers' groups, farmers' markets, and foodbanks more difficult to start and harder to run.

² Community supported agriculture is a food system that connects farmers and eaters more closely by allowing the eater to subscribe to the harvest of a certain farm or group of farms. It is an alternative socioeconomic model of agriculture and food distribution that allows the producer and consumer to share the risks of farming. The eater subscribes to a harvest and in return receives the produce on, for instance, a weekly or monthly basis. Farmers and eaters form relationships through the provision of letters, emails or facebook posts around what is happening on the farm, invitations to a harvest, or holding on-farm open days and events.

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.³

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.⁴ That obligation includes *respecting, protecting, facilitating* and *providing* access to adequate food to ensure food security and healthy livelihoods.⁵

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. However, major determinants of food prices along value-chains are becoming more complex in nature and connection to other factors. Increasing the burden of regulation on existing producers will only add to factors which may result in their ceasing production.

Risk: scale matters

AFSA seeks assurance on behalf of our small-scale producers that the consideration of property ID reforms has been conducted commensurate to risk, with acknowledgement that there is already a high level of traceability in models where produce is sold directly from the farmer to consumers.

We stress this as we believe that government policy often fails to capture the model of most small-scale farms. The many risk points represented in the conventional industrial supply chain are vastly reduced in small-scale farming models, most of whom sell their produce direct to consumers.

Conventional Supply Chain for Commodities

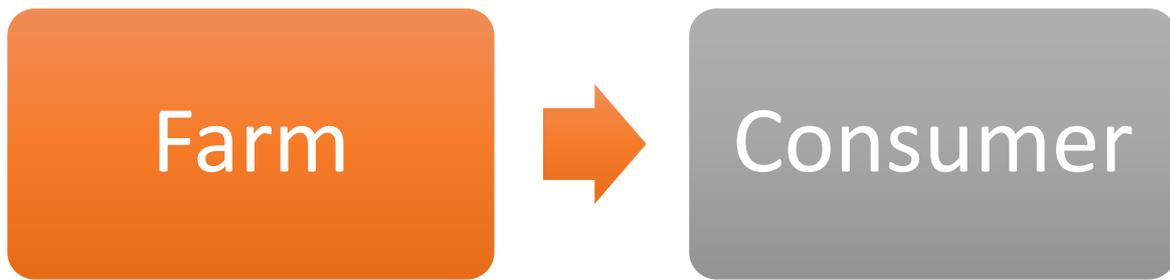


Small-Scale Farm Supply Chain for Food

³ <https://www.ibisworld.com.au/industry-trends/market-research-reports/manufacturing/food-product/fruit-vegetable-processing.html>

⁴ Article 2 of the International Covenant on Economic, Social and Cultural Rights (ICESCR).

⁵ 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>>.



The costs to the community of a food regulatory system that mandates onerous administrative burdens would be significantly greater than any benefit. Many small farms are starting in horticulture for instance because of the low barriers to entry. Increasing regularity barriers into horticulture production 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)

AFSA trusts that the working group considering the property ID reforms will be taking all of 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 the reforms.

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.”⁶

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.⁷

⁶ The Australian Food Sovereignty Alliance, <<https://afsa.org.au/?s=food+sovereignty+>>.

⁷ Patel, R. (2009). What does food sovereignty look like? *Journal of Peasant Studies*, 36(3), 663-671.