



National Food Plan Submissions  
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Dear Senator the Hon. Joe Ludwig

**Re: National Food Plan green paper: Submission of the Australian Food Sovereignty Alliance**

The Australian Food Sovereignty Alliance (AFSA) welcomes the opportunity to comment on the National Food Plan (NFP) green paper, prepared by DAFF. We represent 110 organisations across Australia, including family farmers and food-related small businesses, which are working for an equitable, sustainable and resilient food system for all Australians.

Given the scope, scale, complexity and urgency of the issues that confront the food system as a whole, the NFP initiative is both timely and necessary.

**General comments – the process of developing the NFP**

That said, we believe that a more broadly based, wide-ranging, participatory and inclusive approach to the NFP's development should have been undertaken. While we recognise that a series of national consultations were organised, participation at these meetings was capped, with many members of the public seeking to engage in these meetings, but not being able to gain access.

Likewise, we are concerned about the 'vetting' of participants via the survey that potential participants were required to fill out prior to being issued an invite.

A further concern is that the membership of the NFP Working Group is primarily comprised of big business representatives, and with the exception of CHOICE, has few civil society representatives. We are concerned that environmental groups, public health experts, parents/schools, and community gardeners/urban agriculturalists/fair food movement activists are not represented. The perception of our members is that this 'stacking' of high level committees with the corporate sector does not bode well for a truly inclusive, democratic or fair food system and, on account of those omitted, is unrepresentative.

### **General comments – underlying philosophy and priorities of the NFP**

As regards the substantive content of the proposed NFP, as we mentioned in our response to the Issues paper, there is a need for much bolder questioning of conventional economic orthodoxies and the assumptions underpinning the NFP green paper. Indeed, many of our members have reported feeling constrained at the public consultations when they were asked to respond to a limited number of topics that were already framed within the neoliberal, free-market, 'business-as-usual' approach. This approach does not reflect a truly consultative process, tapping into audience understandings, expertise in their substantive fields and lived experience of the current food system as growers, farmers, practitioners, parents, and eaters.

It has been well documented in the scientific, peer-reviewed literature that the current food system has resulted in significant environment degradation, and is polarising eaters into have-and-have-nots globally (with one billion people obese and one billion people hungry). Further, the current food system, characterised by vertical integration, consolidation, concentration, corporatisation and industrialisation has seen many family farmers leave the land, declining rural communities, and the provision of chemical-laden foods available as 'standard fare' to families.

Additional to this is the contribution of the conventional, 'business-as-usual' approach of the globalised food industry to the worsening of the current global food price crisis. This latest crisis is in many respects a new wave of the global food crisis of 2008, which produced food riots in over 30 countries; and led to many countries ceasing their export of grains to keep them for own their national populations. The immediate causes of the 2008 global food crisis can be largely traced to rampant financial speculation in commodity markets and the diversion of much of the world's grain crop to biofuels. Neither of these issues have been seriously tackled, let alone resolved; and to them we must add the devastating impacts of accelerating climate change and rapidly emerging resource constraints.

There are prudent and sensible policy options to navigate through such challenges, such as supporting a wider transition to knowledge-intensive agro-ecological production methods, controlling commodity speculation and tackling systemic inequalities regarding access to key productive resources, in particular land. Taking such measures will require both vision and the political courage to stand up to those vested interests who want to maintain the status quo, in favour of the interests of the global citizenry as a whole.

The re-emergence of systemic failures and a new global food crisis signifies the existence of malfunctions and failures within the globalised food system that require government interventions and long-term solutions. The challenge for the current generation of Australian politicians is to acknowledge that such failures exist, and to examine, on the basis of the best available evidence and with regard to best practice around the globe, the policy options for their lasting resolution.

As the physicist Albert Einstein famously said, you cannot solve a problem with the same level of thinking that created it. It takes little imagination or education to see that this should be applied to the global food system, and that it should be reflected in any Australian food policy, if that policy is to enjoy any level of credibility.

In the strongest terms, we question the process of consultation that the government has undertaken in the development of the NFP. We similarly strongly question the content which the NFP process to date has produced, in the form of the NFP green paper.

### **Our approach – a fully inclusive and democratic NFP**

We reiterate the need for an authentic NFP, representative of the full breadth of food interests in this country, and one that presents to the Australian community a convincing vision of food and farming systems that will successfully meet the pressing challenges of both the present and the future.

At the heart of this vision must lie the recognition that food is a basic human right to which everyone is entitled; it is not simply another commodity produced for export and profit.

In practice this means:

- following due process in formulating a national food policy and any related plans and strategies by including the full range of food interests in this country;
- guaranteeing a fair price for farmers;
- shifting towards agro-ecological farming systems as the dominant mode of farm production, as a rational and precautionary response to the depletion of non-renewable farm inputs and climate change
- government support in the form of extension services to farmers who choose to make the transition to lower input, sustainable food production;
- transitioning away from factory farming;
- improving access to healthy and nutritious foods for all;
- controlling and properly regulating the supply of energy-dense, nutrient-poor foods (e.g., prohibitions on advertising of junk foods to children, as voluntary codes have failed); and
- supporting a whole-of-society effort to eliminate the unacceptable levels of waste that we currently tolerate at all points in the food supply and farm production systems.

## **Key assumptions underpinning the green paper**

We reiterate our concerns about the key assumptions that underpin the green paper, and caution DAFF that following the same trajectory is short-sighted and counter to both conventional wisdom and cutting edge academic research:

*Substantial, unavoidable and imminent changes in our food supply systems ... require fundamental shifts in how we manage land and resources for food production ... these potentially non-linear changes mean the past is not necessarily a reliable indicator of the future and care must be taken in avoiding 'lazy' assumptions about the possibility of continuing in a business-as-usual trajectory*

(Melbourne University's Victorian Eco-Innovation Lab, Food Supply Scenarios, April 2011).

We have elaborated on the flawed assumptions that underpin much of the thinking behind the green paper, in a widely read article published on the Conversation website.<sup>1</sup> In submissions already made to the green paper, the narrowness of the government's focus on global competitiveness and increasing productivity has been revealed as failing to address the many serious shortcomings of our food production and supply systems.

The situation facing most farmers – especially smaller-scale operators, but by no means those exclusively – is particularly acute. In the words of Mr Eric Gribble,

The Agricultural sector in Australia is struggling. Those who are not walking away from it all are only barely making subsistence living. As a greenhouse Capsicum grower who works long hours I wish I could walk away from it all, however I have committed my life savings to my business so I keep persevering.  
(Eric Gribble, submission to the green paper for a NFP)

Similarly, Ms Gayle Day, who writes on behalf of 'the family owned farm', points to the severe demographic crisis facing this country's farmers:

Our children see us working very hard, and they know the farm struggles to make ends meet...Why would any child growing up here see constant sacrifice and hardship as a great future?...Are you aware of the seminar being run called, "Handing on the Family Farm is Not Child Abuse?"  
(Ms Gayle Day, submission to the green paper for a NFP)

Ms Day makes what would seem the obvious, commonsense observation that

In order to have 'food security' you need to farm. In order to grow food for an increasing population you need to have farmers...You need us to stay here, trust me, you want us to succeed.  
(Ms Gayle Day, submission to the green paper for a NFP)

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<sup>1</sup> Rose, N., and Croft, M., 2012, **The draft National Food Plan: Putting Corporate Hunger First**, <http://theconversation.edu.au/the-draft-national-food-plan-putting-corporate-hunger-first-8342>.

And yet, regrettably, the green paper offers no vision for family farmers. On the contrary, it sees as inevitable the further application of 'market logic' and 'structural adjustment', which will lead to increasing rationalisation of the family farming sector, the growing corporatisation of Australia's farms, and an increasing reliance on imported foods from lower-cost countries. This same point is made by Jon Durham, of Apples and Pears Australia, who writes that:

[T]he morale of my members is very low – they do not see a bright future for their industry. In fact the most likely future scenario that they see is that imported food will replace all locally produced processed foods (such as canned, juiced or frozen products) and that in the longer term the same will apply to fresh food.  
(Jon Durham, APAL submission to the green paper for a NFP)

The NFP outlined in the green paper does not acknowledge sufficiently the significance of fundamental problems in the present system or provide an adequate response. Instead, it adopts a 'more of the same' approach, which prioritises the interests of the big food industry, as summarized below:

- The green paper fails to adequately assess the risks to Australian food security from climate change and constraints on the availability of natural resources, such as oil and water which are key inputs into 'business as usual' food production (agrichemicals, fertilisers, etc.)
- The green paper does not reflect the evidence put forward by the community in submissions, or the significant body of Australian and international research on key issues, such as the likely impacts of climate change and natural resource constraints on food production
- The NFP should aim for transformational change, rather than the 'business as usual' approach taken in the green paper, which relies on large corporate support. There is significant and growing public support for government interventions to fix the major health and sustainability issues facing the food system
- Government, the food industry and eaters all have a role in creating food system change. The Working Group composition does not adequately reflect that there are food system stakeholders beyond the corporate sector.
- The impacts of environmental constraints on food production in Australia, particularly related to climate change, mean that the aim of doubling bulk commodity exports by 2030, especially without any local value-adding, is both unrealistic, and socially and environmentally destructive.
- There is no recognition in the green paper of the importance to the Australian public of regional and local food systems, yet support for and reliance on regional and local food systems is rapidly growing

- The green paper does not treat with sufficient seriousness the impacts of Australia's supermarket duopoly. Australia has the world's most concentrated supermarket sector and the effects on producers and eaters is easily observable for anyone who wishes to see it: declining viability of family farms and Australia's food processing and manufacturing sector, on the one hand, matched by the declining health of the general population with the onset of the obesity pandemic, on the other. Mr Gribble, in his submission, makes this point very well.
- The green paper fails to recognize the value of protecting land on the fringe of cities for food production to provide a local source of foods to underwrite urban food security, and the need to map this land, as part of a well-rounded approach to mitigating the risks of climate change and peak oil on Australia's food security. Equally the green paper does not treat with sufficient seriousness the threats posed to Australia's prime farmland by the rapid expansion of the coal-seam gas industry
- The green paper focuses on improving the productivity and competitiveness of large- scale agri-businesses in the grain and fibre sectors, but pays insufficient attention to solutions for improving the economic viability of small-medium sized farmers, horticulturalists, market-gardeners and the increasing role of urban agriculture in food production

### **Our view on the current state of the globalised Australian food systems**

Bearing in mind these observations, together with the growing weight of evidence of the manifest failings of the globalised, 'free trade' food system from around the world, AFSA's considered view is as follows:

On one level, the food system, conceived as a sector of the economy like any other, is fulfilling its primary purpose of generating profits for the large national and transnational corporations who are its principal beneficiaries. Seen in this light – and regrettably it appears to us that this is how the government sees it – the food system is actually functioning reasonably well, as indeed the government suggests in the Green Paper.

On another level – a level which prioritises human health and well-being, and ecosystem integrity, well above corporate profitability - the Australian food production and supply systems are broken. The current system is contributing to significant public health, social, economic and environmental problems. Further, climate change and increasing stresses on environmental resources are threatening the viability of the current food system to meet the food and nutrition requirements of this and future generations.

## **Our view on the purpose and role of the NFP**

We say that the purpose of any national food plan must be to feed the Australian people with sufficient food, year-round, of a type that supplies a nutritionally balanced diet capable of providing for the needs of an active life. This is a widely accepted definition of food security.

We agree with the Food Alliance that the overarching goal of Australia's NFP should be:

**'An environmentally sustainable, prosperous and resilient food system that promotes access for all to nutritious, fair and affordable food'.<sup>2</sup>**

Our NFP needs to facilitate and support transformational change of the Australian food system so that it can serve as a safe, secure, sustainable and prosperous resource for the whole Australian community.

To achieve this objective, transparent, accountable and democratic governance processes are vital. Any mechanism for facilitating whole of government food policy must have appropriate decision-making powers, and should report directly to the Prime Minister. We propose that the key governance mechanisms for the National Food Plan should comprise a Ministerial Food Forum, an Advisory Council and an independent Food Commissioner, with broad representation and open, democratic processes.

## **Concluding remarks**

In short, contrary to the Government's claims, the green paper is a recipe for increasing vulnerability, lack of resilience, and heightened inequality in our food system. A different approach, based on a different set of values and priorities, is required.

In the absence of leadership and vision on these issues from the Government, the Australian Food Sovereignty Alliance is inviting all concerned members of the public to join us in a truly participatory and democratic conversation to develop an authentic and representative food system that is truly fit for the food and nutrition challenges of this century.

We have produced a draft discussion paper of Values, Principles and Best Practices for a People's Food Plan for Australia (attached as Appendix A), which is currently receiving an enthusiastic reception at public forums and kitchen table talks around the country.

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<sup>2</sup> Food Alliance (Population Health Strategic Research Centre, Deakin University), Submission to the green paper for a NFP.

We will be continuing to support this process over the coming months and years, and would urge the Government to take note of the fact that this process, resourced only by the dedicated volunteer labour of dozens of committed supporters around the country, evidences the existence of a growing constituency for a fair, sustainable and resilient food system for Australia.

Yours sincerely

Nick Rose  
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Australian Food Sovereignty Alliance