



Response to Animal Industries Advisory Committee Discussion Paper

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Prepared by Tammi Jonas, President, Australian Food Sovereignty Alliance

About the Australian Food Sovereignty Alliance (AFSA)

The Australian Food Sovereignty Alliance (AFSA) is a collaboration of organisations and individuals working together towards a food system in which people have the opportunity to choose, create and manage their food supply from paddock to plate. AFSA is an independent organization and is not aligned with any political party. Currently we have 230 individual, organisational, business and farm members. These members include national networks such as the Australian City Farms and Community Gardens Network, peak bodies such as the Melbourne Farmers Markets Association and the Victorian Local Governance Association, the City of Melbourne, and leading environmental organisations such as Humane Choice, MADGE and Gene Ethics.

In 2014 we established a producers' branch of AFSA, Fair Food Farmers United (FFFU) to provide a balanced voice to represent farmers who are at the sharp end of the impacts of free trade, raise awareness about the impacts of cheap imports on farmers, advocate for fair pricing for farmers selling to the domestic market, connect Australian farmers for farmer-to-farmer knowledge sharing, and to be a voice for farmer-friendly regulations and standards.

We are a part of a robust global network of farmer-led organisations involved in food security and food sovereignty policy development and advocacy. Our involvement includes support for the sole Australasian representative on the Civil

Society Mechanism (CSM) of the Food and Agriculture Organisation's (FAO) Committee on World Food Security (CFS), as well as being the Australian representative on the International Planning Committee for Food Sovereignty (IPC). We are also a member of Urgenci: the International Network for Community-Supported Agriculture, and have strong links to Slow Food International and its Australian chapters.

We work extensively with primary food producers and consumers across every state and territory in Australia. Our committee has consisted of published academics and lecturers from RMIT, Deakin University, University of Tasmania, University of Sydney, and the Queensland University of Technology, farmers from NSW, VIC, ACT, SA, and WA, and local advocates and campaigners representing Food Connect, Friends of the Earth, Regrarians, Fair Food Brisbane and the Permaculture Network.

Our vision is to enable regenerative farming businesses to thrive. Australians increasingly care about the way their food is produced including its social and environmental impacts. They seek out food that is grown locally and without damage to the environment. This means that food produced on small regenerative farms is increasingly in demand. Most Australian farms are still small. Just over half of Australia's farms had an estimated value of agricultural operations of less than \$100 000 in 2010-11¹. Because Australia's agriculture sector is built on small farm businesses, removing unnecessary regulatory burdens is important for these operations to be viable and to encourage more people to embrace a life on the land to produce food sustainably for their communities.

AFSA welcomes this review by the Animal Industries Advisory Committee and the opportunity to contribute our views on potential planning policy solutions to address the issues faced by livestock farmers particularly and small- to medium-scale farming more generally in Victoria.

Introduction

The current planning definition of 'Intensive Animal Husbandry' is clearly inadequate and causing significant material and symbolic damage to Victoria's farming community. The fact that the same definition is applied to a 30-sow pastured pig farm that is applied to a 1000-sow indoor piggery is a stark example of this inadequacy and the urgent need for reform of the planning scheme.

¹ Australian Bureau of Statistics 2012, *Australian Social Trends*, December, Cat. no. 4102.0

Two of the purposes of the Farming Zone are:

- *To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture.*
- *To encourage the retention of employment and population to support rural communities.*

At the heart of the current review of animal industries is the perceived or actual conflict between residential and agricultural land use. The Farming Zone must maintain a key focus on protecting land for agricultural use, especially as the pressures of development for non-agricultural uses are being felt in peri-urban areas that have not been responsibly managed to date and have forced farming further and further from Melbourne and regional cities. The pressures of a growing population must be dealt with in the residential suite of zones, not in Farming or Green Wedge Zones. Please note that in our use of 'Farming Zone' throughout this submission, we include 'Green Wedge Zone'.

The Food and Farming System in Australia

In a political environment that prioritises expensive, high-tech solutions that fail to address the primary concerns of food production, our national food system is struggling under the burden of worsening public health, concentration of market power, and an undemocratic focus solely on narrowly defined economic outcomes: big operators over smaller farmers, and multinational corporations over the small-to medium-sized and locally-owned businesses that are the lifeblood of our regional and rural communities. This narrow and misaligned focus is paid for in rural inequity, shrinking rural communities, a lack of investment in infrastructure and significantly poorer social and mental health outcomes².

A simplistic message of 'scale up production and export more' is not assisting ailing rural communities, and nor is it feasible. Australian producers are being asked to adapt quickly to variable climate changes that happen in months and years, not decades³. In addition, increasing the demand on farmers to produce more with the focus on chemical fertilisers, genetically modified crops, and intensified livestock production systems does not lead to a sustainable system.

² <http://www.crrmh.com.au/index.php/our-work/research-projects/armhs>

³ Stokes C & Howden M. (Eds.) 2010. Adapting Agriculture to Climate Change: Preparing Australian Agriculture, Forestry and Fisheries for the Future. CSIRO PUBLISHING.

We take the view that while we need to support our farmers with access to markets, encouraging more intensive, large-scale, and export-focused farming is not the solution to long-term food security and food sovereignty in Australia.

Farmers committed to producing healthy, sustainable food for their local communities should have assistance, support and training for the continual necessary transition to genuinely sustainable forms of production. Small-scale farmers across Australia are already engaged in sustainable practices to provide nutritious food for their communities while caring for the soil they grow on.

Agroecology and its Potential

Agroecological farming is the application of ecology to the design and management of sustainable agroecosystems⁴. It is a whole-systems approach to agriculture and food systems development based on local food system experiences. It links human and ecological health, culture, economics and social wellbeing in an effort to sustain agricultural production, healthy environments, and viable food and farming communities.

For example, this is achieved through using renewable resources such as biological nitrogen fixation, using on-farm resources as much as possible and recycling on-farm nutrients. Agroecology aims to minimise toxins and conserve soils by using perennials, no-till or reduced tillage methods, mulching, rotational grazing, and mixed-species paddock rotations.

The most important aim of agroecology is to re-establish ecological relationships that can occur naturally on the farm instead of monoculture farming's narrow, input- and output-reliant paradigm with its associated externalised costs. Pests, diseases and weeds are carefully managed instead of 'controlled' with damaging chemicals. Intercropping and cover cropping draw in beneficial insects and keep moisture in the soil. Integrated livestock ensure a symbiotic relationship between soils and animals. Efforts are made to adapt plants and animals to the ecological conditions of the farm rather than modifying the farm to meet the needs of the crops and animals.

From an economic view, agroecological farmers aim to avoid dependence on a single crop or products. They seek out alternative markets and many rely on Community

⁴ <http://www.agroecology.org/>

Supported Agriculture (CSA), farmers' markets, 'pick your own' marketing, value-added products, processing on-farm and agro-tourism. These direct connections and regular engagement with local and urban consumers are of further benefit to the economic and social health of rural communities.

Response to proposed policy directions

While AFSA appreciates that it is outside the scope of this discussion and the role of planners, we believe that it is time for a rigorous inquiry into the animal welfare, environmental, and social impacts of intensive animal agriculture. As this discussion paper highlights, community acceptance of intensive livestock systems is declining, and more communities are opposing the development of new, or expansion of existing, intensive operations.

The Minister for Agriculture conceded the need for improvements and better community engagement by the intensive chicken industry when she announced the [Chicken Care Program funding in August 2015](#).

The Minister has also expressed the Victorian Government's support for those seeking to grow the intensive chicken industry in this state. AFSA questions the wisdom of this approach – what is the aim here?

- To increase the profitability of private businesses?
- To provide employment in rural areas? or
- To produce more food on less land?

Profitability of large-scale intensive farms is often in fact lower than on small-scale diversified farms. Employment on mixed-farm enterprises and the agri-tourism industries often associated with small-scale, educational farms surely offer better options than working in the toxic environment of pig and poultry confinement sheds and their associated processing and distribution systems. Further, if the aim of increasing production to meet demand for food, then attention would be more appropriately focused on addressing the intolerably high level of food waste in Australia post-harvest through to domestic waste rather than raising production in a manner that, paradoxically, creates more waste.

With this context of working more holistically for a fair, sustainable food system, please see our feedback on the questions provided in the discussion paper below.

1. Provide stronger strategic guidance by undertaking regional agricultural land capability assessments and identifying appropriate areas for intensive agriculture in local planning policies.

AFSA supports the undertaking of land capability assessments across the state for suitable agricultural enterprises. However, we strongly recommend taking into account community sentiment about intensive agriculture when determining what areas are genuinely to be deemed 'suitable'.

Recommendation: that local communities are consulted and that where there are significant objections to proposed development of intensive animal agriculture the decision of whether to grant a permit is made democratically with the community's involvement.

2. Strengthen the purpose of the Farming Zone to promote agriculture activity as the priority activity and remove reference to encouraging dwellings as a means of promoting population growth.

Two of the purposes of the Farming Zone are:

To ensure that non-agricultural uses, including dwellings, do not adversely affect the use of land for agriculture.

To encourage the retention of employment and population to support rural communities.

While the Committee has suggested that these purposes are contradictory, AFSA respectfully submits that the regenerative, agroecological farming movement offers an alternative in which increased population on farms is desirable and supports the purpose of farming as the priority activity. Agrarian intellectual Wendell Berry famously called for a better ratio of 'eyes to acres' – that is, *more* people watching and working the land to ensure it is cared for attentively and sustainably.

Former UN Special Rapporteur on the Right to Food Olivier de Schutter has also pointed out that agroecology is 'knowledge and labour intensive' – surely a welcome thing when seeking greater employment opportunities in rural Australia, and aiding in slowing rural-urban migration.

Allowing for multiple dwellings on what would be classified a single farm, will aid farmers wishing to practice multigenerational farming. This could allow a smoother

transition in the farming population as younger farmers will have the opportunity to live on farm with their own families while they learn by doing. Furthermore, holistic farming on a single plot of land has the potential to support several families making their living from various farming enterprises that support each other socially and ecologically.

So while AFSA strongly supports the need to recognize agriculture as the priority activity in the Farming Zone, we see a need to offer more flexibility to enable farms to construct suitable dwellings for the rich community of workers needed to manage these systems, where those dwellings are genuinely built in support of agricultural purposes.

Recommendation: create more flexibility for the construction of dwellings built in support of the agricultural purposes on farms, while maintaining and strengthening guards against converting farms to purely residential, lifestyle properties.

3. Identify in planning schemes defined buffer distances for different types and scales of intensive animal industries.

Under the current inadequate definition of 'Intensive Animal Husbandry' the application of buffers can be highly inappropriate to scale. For example, in the case of Jonai Farms where there are just 12 sows (so a total herd of around 110 pigs at any given time) on 9ha of paddocks, the 250m buffer zone from rural dwellings recommended by Australia Pork Limited (APL) is actually wider than the pig paddocks in their entirety, and yet at times there are no pigs visible in a one-acre paddock due to low stocking densities. When applied, however, to a large intensive piggery with the attendant odour issues, most people would object to living downwind of such a structure within 250m.

Recommendation: that after the definition of 'Intensive Animal Husbandry' is revised to no longer include small-scale, low stocking density, free-range farms, that buffer distances are determined in close collaboration with communities on a case-by-case basis where intensive agriculture is proposed.

4. Require a permit in the farming zones for new dwellings within the buffer distance of intensive animal operations.

As proposed in point 3, the definition of 'Intensive Animal Husbandry' must exclude small-scale, low stocking density, free-range farms, and any buffers should be developed in collaboration with the local community on a case-by-case basis.

5. Base the generic definition of intensive animal husbandry on the impacts of the operation.

The current definition based on importing 50% of animals' nutritional needs is clearly inadequate, and does not helpfully distinguish between different systems and their impacts, be they environmental, social or welfare impacts.

Importing 50% of the feed for 200 chickens foraging in rotations on 10 ha is a very different proposition to importing 100% of the feed for 10,000 broilers housed in a shed. Whereas the manure in the pastured operation fertilizes paddocks directly with no need for treatment and removal, in the actually intensive operation, effluent must be carefully managed to ensure nearby catchments and waterways are not polluted.

APL funded research in 2014 that found that pigs in its rotational outdoor piggery study were 'adding some 300-600kg N/ha/yr and 100-200kg P/ha/yr [...] presenting environmental risks to both surface water and groundwater.' The research is included in APL's publication 'Rotational Outdoor Piggeries and the Environment', which cites cases of pigs being rotated after 6-24 months on paddocks. The citation does not include the stocking density that created this nutrient load.

Using the Nutrient Balance Calculator available on the APL website, we were able to calculate that a system like Jonai Farms (12 sows, 2 boars – total herd size of approximately 110 pigs at any given time on 9ha) where pigs are rotated anywhere from fortnightly to up to two months adds 15kg N/ha/yr and 6 P/ha/yr, and that just one season of lupins would actually deplete the overall available nitrogen and balance the phosphorous and potassium.

What this comparison seeks to demonstrate is the inappropriateness of comparing high-density intensive animal systems with low-intensity extensive animal farms through total nutrient imported alone. A combination of nutrient import and stocking density may serve better to determine the potential impact of livestock agriculture.

Recommendation: that the generic definition of intensive animal husbandry be based on the impacts of the operation, which will be determined on a case by case basis by a metric that takes into account soil type, rainfall, nutrient import, livestock species, stocking density, and pasture coverage.

6. Base the requirement for a permit for animal industries on the potential environmental and amenity impacts of the operation derived from an assessment with an online tool.

In principle, AFSA supports the development of an online tool to enable a simple assessment of the potential impacts of animal industries to determine permit requirements, acknowledging the complexity of information needed to make such an assessment (water supply catchments, significant native vegetation, soil type, rainfall, proximity to settlements...).

Such a tool would best be developed through collaboration between government and industry, including both intensive and extensive, large-scale and small- to medium-scale farms.

7. Create specific land use terms for poultry farms (broiler, egg and hatcheries), cattle and sheep feedlots and piggeries and other clearly intensive uses, to avoid reliance on a generic intensive animal husbandry definition where possible.

The current Nesting Diagram for Agricultural Land Use Terms (Fig 3) does not accurately reflect contemporary farming practices, however, the nesting of 'Cattle feedlot' and 'Broiler farm' under 'Intensive animal husbandry' does seem to indicate that the current interpretation that has seen issues arise for small-scale free-range farms is not what was originally intended in the scheme.

This highlights the risk in creating specific land use terms that may quickly become outdated as farmers innovate and develop new, regenerative models that don't fit neatly into the terms dictated by the scheme.

For these reasons, AFSA does not support the creation of specific land use terms for different intensive operations, and instead reiterates the recommendation under point 5 to clarify the generic definition of 'intensive animal husbandry'.

8. Strengthen permit triggers, application requirements and referral arrangements for animal industry applications.

While in principle AFSA supports strengthening permit triggers, application requirements and referral arrangements for genuine intensive animal industry applications (as per a new definition that excludes genuine small-scale free range farms), caution must be applied when increasing regulatory burden on the farming sector, which is already subject to a high regulatory burden. Such strengthening should focus on potential high impact operations, such as large-scale feedlots, broiler sheds, and indoor piggeries.

9. Limit the 'right to object' in the Farming Zone when standards prescribed for an animal husbandry enterprise type are met.

While we appreciate the impulse to protect agricultural enterprises from the objections that may sometimes arise when 'tree changers' or inhabitants of non-farming lifestyle blocks lack sufficient knowledge of normal or innovative farming practices, it is our view that limiting the 'right to object' in a democratic society is deeply problematic.

There is a need to balance the importance of community sentiment with evidence-based planning policy that supports agriculture, and AFSA would suggest that another way forward may be in the assessment of objections, rather than in limiting the right to object.

AFSA does not support limiting the 'right to object' in the Farming Zone.

10. Clarify when farming operations have existing use rights.

AFSA supports clarifying existing use rights to ensure balance is maintained between protecting legitimate existing use rights and not allowing inappropriate new uses to pass undetected, e.g. intensifying animal industries on inappropriate sites.

11. Create a single point of contact for all enforcement actions whose role it is to oversee enforcement activities.

AFSA has long campaigned for the creation of an inter-departmental Ministerial Food Forum to ensure strategic and coherent policy development and integration of planning in and across departments managing local food and food systems, population health, transport, land use, education, environmental sustainability,

natural resources, infrastructure and economic development. We suggest that a single point of contact only for enforcement carries the risk of a punitive approach rather than coherent policy and planning support for agriculture.

Recommendation: create a Ministerial Food Forum to ensure strategic and coherent policy development across all agriculture and food system activities.

12. Increase the role of the EPA as an enforcement body.

See our response to point 11.

13. Set clearer prescribed standards and conditions for intensive animal industries in planning schemes using the Codes of Practice approach.

Codes of Practice are unnecessarily prescriptive and quickly outdated. They rarely support innovation and industry best practice. The Committee admits in this very discussion paper that the current Codes of Practice are out of date.

AFSA does not support the implementation of more codes of practice. Instead, we recommend that permits are only granted where impacts have been demonstrated to be acceptable under the requirements, and where deemed acceptable by local communities.

14. Develop and maintain a contemporary Codes of Practice for all intensively farmed livestock (as a minimum for poultry (broiler, egg and hatchery), piggeries, cattle feedlots, sheep feedlots, and feedlot dairies).

See point 13.

15. Introduce a fast track process for applications that meet defined standards.

While streamlining regulatory burden is desirable to support innovation in agriculture, it must be balanced with appropriate community and environmental protections. Were a fast track process to be introduced, a risk-based assessment should be applied and only low-risk applications (e.g. small, extensive operations not on sensitive sites) be made eligible for streamlining.

16. Formally recognise participation in compliant industry assurance programs in the planning process. Some examples include APIQ, NFAS, Chicken Care and Egg Corp Assured.

Industry-based assurance programs are not necessarily aligned with community values, and must be independently assessed before government relies on them to

streamline the planning process. While industry bodies have a fiduciary duty to serve the interests of their members, government's duty is to the public.

At this time, AFSA does not support formal recognition of participation in industry assurance programs as part of the planning process.