

## Response ID ANON-NESK-81R1-W

Submitted to Horizon scan to support the System Strategic Direction for 2023-2026  
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### About you

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Please tick this box if you would like your response to be confidential

What sector do you represent? (Required)

Not-for-Profit (please specify)

If 'other' sector selected, please specify in the text box:  
Farmer-led civil society organisation

What is your organisation?

Organisation name:  
Australian Food Sovereignty Alliance

Which country are you responding from? (Required)

Australia

If you selected 'other' please specify country:

The field below provides an opportunity to submit any other information about your organisation.

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The Australian Food Sovereignty Alliance (AFSA) is a farmer-led civil society organisation of people working towards socially-just and ecologically-sound food and agriculture systems. The democratic participation of First Peoples, small-scale food producers and local communities in decision-making processes is integral to these efforts.

AFSA provides a balanced voice to represent small-scale food producers and local communities' interests at all levels of government. We connect small-scale food producers for farmer-to-farmer knowledge sharing, assist local, state and the federal government in instituting scale-appropriate and consistent regulations and standards, and advocate for fair access for small-scale food producers to local value chain infrastructure and markets.

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). We also support the Australasian representative on the Civil Society and Indigenous Peoples' Mechanism (CSM), which relates to the UN Committee on World Food Security (CFS).

Our vision is to enable agroecological and regenerative farms to thrive. This has taken on an added salience in the face of the increasing impacts of the climate crisis and the ongoing COVID-19 pandemic. Australians care more than ever about the way their food is produced and how and where they can access it, with a growing awareness of its social, environmental, and economic impacts. Nutritious food produced locally in socially-just, ethical and ecologically-sound ways is increasingly in demand. Governments must facilitate and encourage the emergence and viability of agroecology and regenerative agriculture embedded in localised food systems with short and direct supply chains, thereby protecting the environment and human and animal health. Inextricable to this vision is the need to honestly and truthfully account for the land's needs. As such, AFSA works to increase understanding of and appreciation for Aboriginal and Torres Strait Islander Peoples' connection to and care for Country and the ongoing impacts of colonisation and development on Country. We aim to put First Peoples' knowledge first as best practice for healing Country and sustaining life, and as an organisation are committed to decolonising the food and agriculture sector.

The National Committee has consisted of farmers and allies from every state and territory in Australia, as well as academics from the University of Melbourne, RMIT, Deakin University, University of Tasmania, University of Sydney, QUT and UWA. We have also had representation on the National Committee by local advocates and campaigners such as Open Food Network, Food Connect, Friends of the Earth, the Youth Food Movement, Fair Food Brisbane, and the Permaculture Network.

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## Consultation Questions

1 Are the trends, issues, risks, and opportunities affecting the broader food system accurately captured in the Horizon Scan?

No

If you answered no, which matters have not been captured? :

AFSA commends the System for acknowledging the need for significant food regulation reform. We note positive steps taken to ensure that regulation supports socially-just and ecologically-sound food systems. However, we seek to underscore that large-scale industrial agriculture and corporations still exercise excessive market control over independent producers, who play a critical role in feeding local communities. In addition, the consultation paper notes pressing challenges, such as climate change and emerging diseases, will put significant pressure on food systems and its stakeholders.

AFSA notes a critical gap in the Horizon Scan paper is consultation with First Nations peoples, whose traditional knowledge and practice in caring for Country should be considered first and foremost in all areas of regulatory reform. Further to this, AFSA has previously highlighted how regulation contributes to the systemic oppression and violence used against First Nations' traditional foodways. In NSW, regulation has led to the criminalisation of Yuin people fishing for abalone. We stress that food regulation reform must seek to recognise First Nations sovereignty and right to self-determination in all aspects of the food system, and we hope this is captured in subsequent consultation with First Nations stakeholders throughout all stages.

AFSA has reviewed the Horizon Scan document and will refer to specific items to highlight which aspects of regulatory reform we believe have not been accurately captured at this stage.

More from less: More demand for limited resources

Under point 24, the consultation paper notes the challenges of increasing demand to feed growing populations, while conserving agricultural land and water from environmental impacts. AFSA believes it's important to consider that Australia currently produces enough food per year to feed around 75 million people. It's estimated that by 2050, Australia's population will increase to around 35 million people. A key issue that emerges here relates to the Australian Government's continued focus on food as a commodity, where Australian farmers produce 93 per cent of Australia's food, even while exporting some 70 per cent of what we produce overseas. Meat producers are among the largest exporters, with on average 75% of beef and veal, and 73% of lamb and mutton, sent offshore. The productivist and export focus is often framed within a moralising discourse that Australian agriculture is 'feeding the world'. Yet, the reality is that exports are directed not to countries suffering widespread food insecurity, but rather the 'highest value markets in developed economies and to the middle classes in developing countries'.

Going, going...gone? Breach of environmental limits

Similarly, point 25 in the consultation paper does not seem to account for:

1. the industrialised and globalised agriculture and food system creates as much as 57% of total global greenhouse gas emissions
2. industrialised agriculture (via deforestation and land use change) is a major factor in the mass extinction of other species
3. resources such as soil, water, phosphate and cheap, readily accessible oil, on which the industrial food and agriculture system depends, are in sharp decline

AFSA acknowledges that policy and regulation go hand-in-hand. We have been vocal about our position on the Australian Government's plan to increase agriculture to a \$100 billion industry by 2030. Intensifying agricultural outputs for exports will only add to the ecological and social burdens from the current system. As such, regulation should seek to enforce rigorous measures at scale, the higher intensive agricultural activity becomes to mitigate risks and impact. This also applies to the increasing role of food systems in sustainability, where globalised economies and food miles now account for 19 per cent of total greenhouse gas emissions from agriculture.

Silk highway/Geopolitical tensions: Shift in global economy & fractal politics

There is extensive evidence to suggest, that in the current, corporate dominated globalised food system:

1. family farmers everywhere struggle to earn a decent living
2. fresh, nutritious food is becoming less affordable for many people
3. animal welfare standards are barely existent in factory farms
4. as much as half of all food produced is wasted
5. we need fair trade, not just free trade.

It should be accurately captured in this paper and proposed reforms that Australia does have the capacity to feed a growing population if regulation supports the scaling-out of small-scale, independent food production, processing and distribution. AFSA represents small-scale farmer members who commit to decentralising food systems and localising economies through alternative pathways such as community supported agriculture (CSAs), farmers markets and direct farm-gate sales. We also emphasise that the majority of our farmer members adhere to the principles of agroecology, working with nature to create holistic management systems that work to enhance agricultural land, rather than degrade them through the use of intensive chemicals and resources. Regulation should seek to support small-scale, independent producers through the establishment of risk-based, scale appropriate measures.

Forever young: Ageing population, high chronic disease & spiralling health costs and Great expectations: Shift in consumer wants & needs

AFSA acknowledges that consumer concerns about climate change and the treatment of intensive livestock has led to increased demand in plant-based food as outlined in point 35-36. However, the rise in plant-based meat substitutes contribute to the increasing number of ultra-processed foods sold in supermarket chains. Regulation of plant-based products should seek to provide consumers with transparent information about nutritional value and health risks associated with consuming ultra-processed lab meats and other substitutes. Companies producing plant-based meat substitutes through lab fermentation have relied on fetal bovine serum, extracted from pregnant cows during slaughter, as a growth medium in the production of synthetic meat. For consumers purchasing meat substitutes for ethical reasons, regulation should also stipulate that plant-based companies disclose this information clearly on packaging, so that consumers can make informed choices. In the case of fetal bovine serum being used in plant-based meat substitutes, failure to regulate this adequately could be deemed fraudulent. GMO yeasts are also common in plant-based meat substitutes, which should also be declared.

We note that historically, food regulation to manage health risks have focused heavily on short-term, fast moving threats from pathogens passed through agricultural production. However, these reforms should seek to incorporate a focus on the number of toxic and ultra-processed foods sold in supermarket chains across Australia and New Zealand. While these foods may not pose an immediate health risk, they are unequivocally linked to the rising number of chronic illnesses in Australia, ranging from diabetes to heart disease.

In part 2 of the consultation paper, reference to genetically modified foods (GMOs) should be considered under regulation related to health and wellbeing as well as shifts in consumer wants and needs. Industrial-scale agriculture and food production relies on GMOs and technological advancement to produce at a scale that comes at a significant cost to the environment and public health. Regulation should require that health risks from GMO produce is backed by scientific evidence and made clear to consumers. AFSA asserts that regulation to support the scaling out of small-scale agroecological farming can effectively provide communities with access to safe, fresh food that mitigates the risk of chronic health impacts from GMOs.

Innovation imperative: Accelerating technological advancement

AFSA has identified a gap in the consultation paper related to the risk of big data and big tech encroaching on the rights of smallholders and citizens under points 37-38. Agribusinesses are getting farmers to use their mobile phone apps to supply them with data, on the basis that they can give 'advice' to the farmers. On the output side, big e-platform corporations are buying their way into the sector and taking control of food distribution. Together, they favour the use of chemical inputs and costly machinery, as well as the production of commodities for corporate buyers not local markets. They encourage centralisation, concentration and uniformity, and are prone to abusing their power and monopolisation.

We reject the push for so-called 'inclusive digitalisation of agriculture', which is simply another way for multinational corporations to maintain and gain further control of food and agriculture systems. The overall trend of digitalisation is towards an integration between the companies that supply products to farmers (pesticides, tractors, drones, etc.) and those that control the flow of data.

Signing up with a digital agriculture company could lock farmers into a contract that will force them to buy the products companies promote and sell on credit (at high prices), follow chatbot advice to qualify for insurance (which farmers must pay for), and receive payment via a digital money app (for which there is a fee). Farmers may find themselves locked into selling their farm products to just one company at a price determined by their algorithm. Farmers may be forbidden from repairing the equipment on their own farms.

Food workers may find their jobs replaced by machines such as robots and drones.

They may be expected to work at the same pace as a robot, perhaps by wearing robotic devices, even though this has already been leading to more accidents in highly automated workplaces such as industrial meat processing facilities.

Small-scale farmers need to be able to connect to local markets to sell our produce – not through corporate platforms like Alibaba, but through open source platforms developed by not-for-profits like Open Food Network.

Regulation should promote transparent agricultural data governance that ensures equal rights for small-scale farmers and fishers through the following considerations:

1. Agroecology should provide the framework for innovations that should be promoted, enabled and supported by public policies, financing and responsible investments to ensure sustained development and evolution of agroecological innovations and practices by small-scale farmers.
2. Recognize, support and promote farmer's innovations and agroecological practices, particularly involving indigenous and traditional knowledge systems, harnessing endogenous capacities and responding to local needs and situations, as already enshrined in the UN Declaration on Rights of Peasants.
3. Small-scale farmers should have access to, control and ownership over digital technologies and data in agriculture.
4. Regulation should prohibit monopoly control over digital tech platforms, and promote public-private-farmers partnerships.
5. Regulation should address threats and the adverse consequences of application of digital technologies in agriculture:
  - o Taking away farmer's control over data and information on their fields and practices
  - o Violation of privacy and community rights over data and information pertaining to farmers' practices and innovations
  - o Further consolidation of control and power of corporations over food and agriculture through IPR and control over Big Data
  - o Impacts of digitalization on the environment, biodiversity, genetic resources and the climate
  - o Undermining of farmer's access, control and rights over seeds and breeds resulting from digitalization of agricultural genetic resources.

2 To what extent are there activities underway within your organisation, to manage these issues and risks and to leverage these opportunities?

Please provide further detail below:

AFSA and its members are committed to any measure that ensures all people have access to food produced in socially-just and ecologically sound ways in food systems underpinned by the principles of food sovereignty and agroecology. It is through these guiding principles that AFSA and its members seek to reduce the social, ecological and economic risks associated with globalised food system systems and long supply chains. The COVID-19 pandemic and

foot-and-mouth disease in Bali should inform policy and regulation that acknowledges small-scale, agroecological farming as a clear pathway to mitigating food system risks outlined in the Horizon Scan consultation paper.

AFSA asserts that food sovereignty is more ambitious and holistic than food security, and should be the overarching goal of all legislation, policies and projects across the food system, including regulation reform.

Food sovereignty lies in the following principles:

1. Food is a human need and a basic right, rather than a commodity
2. Food systems should be democratically constructed, responding to diverse social, cultural and environmental conditions
3. 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
4. Resilient food systems require long-term environmental sustainability, where agriculture transitions away from dependence on fossil fuel and chemical inputs; and towards renewable energy and regenerative soil fertility
5. Resilient and sustainable food systems will be more localised and regionalised
6. 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.

The potential of agroecology in contributing to food sovereignty can be seen in the experience of the Pro Huerta movement in Argentina. Since 1990, this nationwide movement in a country of 41 million people, has, through a 700-strong network of professional advisors and technicians, together with 19,000 volunteers, helped build in excess of 600,000 market gardens and 140,000 small-scale farms, addressing pressing food security needs of millions of poor Argentinians, as well as strengthening local economies.

At a high level, we put forward this reasoning to support AFSA's efforts to build local food and agricultural systems that not only comply with standards set by policy and regulation, but vastly improve social, ecological and economic outcomes for producers and consumers. We argue that localised agrarian futures are a common sense alternative to the current industrialised food system. We argue for a divestment from multinationals and re-investment in ethical and ecologically-sound production. Local production and processing builds community resilience and empowers people while respecting and creating opportunities for increased nourishment and employment.

We have been active in campaigning against Brazilian meat company JBS expanding into Australia, where its history of environmental and human rights violations has been widely documented. The recent JBS takeover of Rivalea abattoirs and Huon Aquaculture speaks to an urgent need for regulation that ensures industrial-scale agriculture and corporations are held accountable for social, ecological and economic impacts. It is these dominant, industrial-scale players in our food system that require rigorous, strict regulation that smallholders are often subjected to under a one-size-fits-all approach. AFSA's role in the system will continue to advocate for scale-appropriate regulation that recognises small-scale food producers pose significantly less risk compared with Agribusiness.

AFSA points to part two of the consultation paper, under opportunities to increase antimicrobial resistance (AMR). Comments 60-61 While it is encouraging to see under points 60-61 the emphasis on One Health approaches to deal with the increase in AMR in Australian and globally, we believe it is important to note One Health's recently heightened focus on ecosystems and the prevention of zoonotic disease and AMR rather than only surveillance and control of outbreaks. Current regulatory regimes that control the use of antimicrobials are insufficient, and there should be an investigation into the production systems that create conditions for the growth of pathogenic bacteria, such as intensive pig and poultry sheds and feedlots of cattle and sheep. Regulation could then better prevent disease outbreaks, resulting in less need for treatment.

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.

We also urge the System to consider that the UN's Convention on Biological Diversity is currently drafting a post-2020 Global Biodiversity Framework to replace the failed Aichi Biodiversity Targets. You can see the Zero Draft on the CBD website, where draft Target 7 calls for the reduction of biocides, and Target 18 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.

Finally, regulation must consider a review of agvet chemicals under reform. 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.'

### 3 What opportunities do you consider exist for future work or partnerships, for mutual benefit?

Please provide further detail below:

AFSA stresses the importance of consultation and partnership with First Nations people in food regulation reform and policy processes.

It is critical that any consideration of Indigenous food and land management practices under regulation should be coupled with a rights-based framework that upholds the principles enshrined in the Nagoya protocol (ensuring free and prior consent before the use of traditional knowledges or genetic

materials, and sharing of benefits from the use of either), and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP).

Article 26 of UNDRIP states that "Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired." It directs states to give legal recognition to these territories. AFSA asserts that regulation has not recognised these rights in several cases where First Peoples have been barred from accessing their traditional lands, marine and terrestrial waters for sustenance and livelihood. For example, in the case of the Yuin Peoples ongoing battles to dive for abalone on the south coast of NSW.

Indigenous ways of knowing, and the place-based knowledge and wisdom of peasants, which centre listening to and working with nature within agroecosystems, can provide a basis for preserving biodiversity and the overall health of agro-ecosystems. Food production and consumption epitomises our interrelationship with nature. Instead of putting in place policies and regulations that will lock in more separation between humans and the more-than-human world, the FAO and member states must promote positive interaction between agricultural practices in both managed and wild ecosystems.

From an organisational perspective, AFSA welcomes any opportunity for partnership and collaboration to develop food regulation that supports the following principles:

1. Food is a human need and a basic right, rather than a commodity
2. Food systems should be democratically constructed, responding to diverse social, cultural and environmental conditions
3. 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
4. Resilient food systems require long-term environmental sustainability, where agriculture transitions away from dependence on fossil fuel and chemical inputs; and towards renewable energy and regenerative soil fertility
5. Resilient and sustainable food systems will be more localised and regionalised
6. 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.

Would you like to add anything else to your submission?

Please provide further detail below:

AFSA highlights the extreme compliance burden placed on small- and medium-scale food businesses. Small- and medium-scale food businesses are currently asked to meet the same standards as large-scale food businesses and importers. For example, in small-scale egg production, where a pasture-based producer grading 100 eggs per day by hand for consumption within their local community, they have to undergo an identical accreditation process to an industrial battery farm producing hundreds of thousands of eggs per day. This calls for a decreased regulatory burden and widespread small-flock exemptions.

AFSA urges a review the consistency of food regulation approaches and make subsequent reforms that are commensurate to the level of risk of different scale food producers and businesses. It is important to note that many small- and medium- scale food producers are also food businesses, who conduct processing and retailing of food, often selling direct to consumers. Therefore, the risk points that arise in the conventional industrial supply chain are vastly reduced, due to shorter supply chains resulting in less cold-chain risks and potential contamination points, as well as increased traceability. The three levels of government, each with legislation and agencies that mandate food safety and standards in Australia, results in a duplication of effort for small- and medium- scale food businesses.

At the state government level, the Victorian Government has a specific meat regulator that creates increased regulatory burden and duplication of effort, for example conducting quarterly audits of butchery facilities, compared to an annual audit in New South Wales. Furthermore, Victoria contrasts other states and territories that have integrated food regulators, which are able to view each sub-sector as part of a greater food standards system, resulting in regulation more commensurate to risk.

AFSA urges the reform process to review the ability of state and local jurisdictions to easily and consistently interpret the food standards set at the federal level, to ensure small- and medium- scale food businesses can consistently meet the food standards, without the need to overcome different application processes and inconsistency between state and local (e.g., Environmental Health Officer) auditing processes.

Finally, we welcome regulation reform that considers consultation with First Nations stakeholders at the core of all processes. Enabling the scaling-out of small-scale, agroecological farming through scale-appropriate regulation can strengthen opportunities for our food system to flourish, while mitigating risks from industrial scale farming. Agroecological farming cannot omit the knowledge and perspectives of First Nations people, and regulation should support this notion in the development of much-needed reform.