



Australian Food Sovereignty Alliance

Response to the Inquiry into Food Security in Australia

House of Representatives Standing Committee on Agriculture

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We thank the committee for initiating the inquiry into food security in Australia. AFSA welcomes the opportunity to provide a written submission, as well as all further opportunities to participate in this inquiry. We hope the House of Representatives Standing Committee on Agriculture will facilitate robust and meaningful stakeholder engagement across all aspects of the agricultural and food sector, prioritising the voices of First Peoples, rights holders and those with lived experience of food production and supply.

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About the Australian Food Sovereignty Alliance

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 (CSIPM), 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, the ongoing COVID-19 pandemic and rising food prices as a result of ongoing droughts, fire, flood, and war. 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 we are committed to decolonial futures for food and agriculture systems.

We work extensively with primary food producers and eaters across every state and territory in Australia. The National Committee has consisted of farmers from every state, and local advocates and campaigners such as Open Food Network, Food Connect, Southern Harvest, Friends of the Earth, Regrarians, Fair Food Brisbane, and the Permaculture Network, as well as academics from the University of Melbourne, RMIT, Deakin University, University of Tasmania, University of Sydney, QUT and UWA.

Executive Summary

The global food system is remarkable in its breadth, variety and complexity. But, as the Commission for Human Future's first report on food warns, this system is headed for failure. The constant push for more food at lower prices is taking its toll on the health of people and the environment. Through the production and consumption process, the system wastes one third of all food produced for human consumption. Yet, every year, around 800m people go hungry and poor diets are causing one in five globally. Meanwhile, the global food system generates 30 per cent of total greenhouse emissions. By mid-century, 90 per cent of our planet's soil could be gone and crop yield could reduce by up to 50 per cent.¹

Since we first published the People's Food Plan² in 2013, AFSA has continued to gather democratically to listen to the views of farmers and allies across the country and around the world to continue to deepen and strengthen our positions on what constitutes the most socially just and ecologically sound food and agriculture systems.

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 food security in Australia. La Via Campesina - the global movement of small-scale food producers - defines food sovereignty as:

the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems. It puts the aspirations and needs of those who produce, distribute and consume food at the heart of food systems and policies rather than the demands of markets and corporations.³

Food sovereignty is founded on 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

¹ Commission for the Human Future | Policy Report: The Need for strategic food policy in Australia. Governing for a healthy, sustainable, economically viable and resilient food system 2021 <https://www.humanfuture.net/wp-content/uploads/2021/02/The-Need-for-Strategic-Food-Policy-in-Australia.pdf>

² C. Parfitt et al, The Peoples Food Plan, Australian Food Sovereignty Alliance, 2013. https://afsa.org.au/wp-content/uploads/2012/11/AFSA_PFP_WorkingPaper-FINAL-15-Feb-2013.pdf

³ <https://viacampesina.org/en/food-sovereignty-a-manifesto-for-the-future-of-our-planet-la-via-campesina/>

- 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
- 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 countries⁴

The **food system** can be defined as “[t]he web of actors, processes and interactions involved in growing, processing, distributing, consuming and disposing of foods, from the provision of inputs and farmer training, to product packaging and manufacturing, to waste recycling”⁵.

The food system is shaped by a series of underlying drivers, including: (i) biophysical and environmental factors such as natural resource and ecosystem services, as well as climate change; (ii) innovation, technology and infrastructure; (iii) political and economic factors such as foreign investment, trade, and globalisation; (iv) sociocultural factors such as culture, traditions and women’s empowerment; and (v) demographic factors such as population growth, urbanisation and migration⁶. Three core elements of food systems are the **food supply chain**⁷, **food environments**⁸, and **consumer behaviour**⁹.

A food systems lens highlights the multiple activities and actors within the food system that can be targeted for government intervention (e.g., food production, distribution, retail, and consumption), as well as the need to tackle the full range of drivers of unsustainable, unhealthy, and inequitable food systems, including those that lie outside the food system itself.¹⁰ It draws attention to need to consider the interconnections between the issues this inquiry is concerned with, including food security, managing the impact of climate change on the food system, and limiting the impact the food system has on the environment, and the need to address these issues in a synergistic way – rather than in departmental or policy “silos”¹¹.

⁴ Patel, R. (2009). What does food sovereignty look like? *Journal of Peasant Studies*, 36(3), 663-671.

⁵ (IPENS 2015, 3)

⁶ (HLPE 2015, 24)

⁷ the activities and actors involved in food production, storage, distribution, processing, packaging, and selling. A range of public and private actors are involved in food supply chains, and their decision making affects the type, quantity, price and nutritional quality and safety of the food produced, processed, and made available for sale (HLPE 2015, 24)

⁸ “the physical, economic, political, and socio-cultural context in which consumers engage with the food system to make their decisions about acquiring, preparing, and consuming food” (HLPE (2015), 25)

⁹ involving the selection, purchase, preparation, cooking, and eating of food is influenced by individual and interpersonal factors such as taste preferences, values, convenience, and traditions, but is also shaped by food environments and the accessibility of healthy, affordable, and sustainable food, as well as broader social, economic, and cultural factors (HLPE 2015, 31)

¹⁰ (Hawkes, Parsons & Wells 2019, 7).

¹¹ (Hawkes, Parsons & Wells 2019, 7)

Background

Framing of the Inquiry

The Committee will inquire into and report on food security in Australia, including examining:

- National production, consumption and export of food;
- Access to key inputs such as fuel, fertiliser and labour, and their impact on production costs;
- The impact of supply chain distribution on the cost and availability of food; and
- The potential opportunities and threats of climate change on food production in Australia.

This inquiry focuses on food security including production, consumption and export, access to inputs, supply chain distribution and climate change impacts. We urge the Committee to situate the inquiry within a broader 'food systems' lens, with the goal of achieving food sovereignty.

Policy and governance context

Food security is a whole of government issue and is currently governed by policy, legislation and regulations across a number of federal, state and local government departments. The global food security index (2022) highlights the lack of a food security strategy and government accountability in Australia.¹²

Sustainable Development Goals

Australia is already committed to food security, according to our September 2015 commitment to implementing the 2030 Agenda for Sustainable Development and the 17 Sustainable Development Goals (SDGs)¹³. However, this is not well reflected in effective policy and action, and much more work is required to bring this to the forefront of government policy.

At least three of the SDGs are directly relevant to this inquiry:

Sustainable Development Goal 2: Zero Hunger

Is about creating a world free of hunger by 2030. The number of people going hungry and suffering from food insecurity had been gradually rising between 2014 and the onset of the COVID-19 pandemic. The COVID-19 crisis has pushed those rising rates even higher and has also exacerbated all forms of

¹² On a food security strategy Australia ranks 0.0 compared with the mean average of all countries 60.2 and government accountability 0.0 compared with the mean average of all countries 32.7. The Economist, *Global Food Security Index (2022)* <https://impact.economist.com/sustainability/project/food-security-index/explore-countries/australia>

¹³ United Nations, Sustainable Development Goals <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

malnutrition, particularly in children. The food and agriculture sector offers key solutions for development, and is central for hunger and poverty eradication.¹⁴

“Although Australia is a wealthy first-world country, research has found rates of food insecurity ranging from 2% among older Australians to 76% in remote Aboriginal communities, and Foodbank’s 2020 Hunger Report has found that the effects of COVID-19 has exacerbated existing food insecurity. Ending hunger in Australia will require a transformation of the way food is produced, distributed, and consumed. There is a clear role here for community food networks in imagining and enacting alternative food futures.¹⁵

Sustainable Development Goal 11: Sustainable Cities and Communities

Talks about the costs of urbanisation. Rapid urbanisation is resulting in a growing number of slum dwellers, inadequate and overburdened infrastructure and services (such as waste collection and water and sanitation systems, roads and transport), worsening air pollution and unplanned urban sprawl. The UN food agency, FAO, warned that hunger and fatalities could rise significantly in urban areas, without measures to ensure that poor and vulnerable residents have [access to food](#).¹⁶

Part of this involves improving links between urban, peri-urban, and rural areas, by strengthening national and regional development planning. As local food networks and urban agriculture projects offer economic and environmental sustainability benefits – as well as mitigating urban food insecurity – there is scope to include such initiatives in efforts to implement this goal.¹⁷

Sustainable Development Goal 12: Sustainable Production and Consumption

Talks about waste, energy and environmental degradation. Worldwide consumption and production — a driving force of the global economy — rest on the use of the natural environment and resources in a way that continues to have destructive impacts on the planet.

Economic and social progress over the last century has been accompanied by environmental degradation that is endangering the very systems on which our future development — indeed, our very survival — depends. Each year, an estimated one third of all food produced — equivalent to 1.3 billion tonnes worth around \$1 trillion — ends up rotting in the bins of consumers and retailers, or spoiling due to poor transportation and harvesting practices.¹⁸ Local and alternative food networks can provide more sustainable methods of production and consumption — e.g. by using fewer or no chemical pesticides or fertilisers; shortening supply chains to cut down on greenhouse gas emissions; and

¹⁴ United Nations, Sustainable Development Goals <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

¹⁵ Smith, K, Fair Food Futures, 2022, <https://fairfoodfutures.com/about-sdgs/>

¹⁶ United Nations, Sustainable Development Goals <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

¹⁷ Smith, K, Fair Food Futures, 2022, <https://fairfoodfutures.com/about-sdgs/>

¹⁸ United Nations, Sustainable Development Goals <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

reducing food waste. Meeting this goal will therefore likely require finding methods by which these networks can play a greater role in the Australian food system.¹⁹

Progress on Sustainable Development Goals

Since the Sustainable Development Goals were formally adopted in 2015, Australia has held several multi-stakeholder summits, a Voluntary National Review, and a Senate Inquiry into the SDGs. However, on its current development trajectory, Australia is off track to achieve the Goals. The Senate inquiry into the SDGs²⁰ acknowledges that the 2030 Agenda “is not something that can be achieved just by the federal government or bureaucracy; it is something that needs different levels of government – national, state, and local – business and academia”. Submissions to the inquiry suggested that implementation efforts should involve expanding partnerships with civil society organisations (e.g. through small grants schemes) and that consultation should be established via a multi-sectoral reference group including representatives from civil society.²¹

The Australian Government voluntary review into SDG implementation²² identifies Australia’s agriculture industry as key to achieving Sustainable Development Goal 2: Zero Hunger, and pledges support for “open markets and free trade, and for the reduction of market-distorting agricultural support”. As well as affirming a commitment to market liberalisation, the report focuses on the role of public-private research and development initiatives to improve agricultural productivity and efficiency. There is no mention of the importance of local and community food networks in addressing hunger or improving Australia’s food system. (While the report acknowledges the charity sector as key to reducing food waste and mitigating food insecurity, it does not mention initiatives attempting to challenge or transform the food system itself.)²³

In the section on Sustainable Development Goal 12, reducing food waste is acknowledged as a major aspect of sustainable resource management, but the focus is on government policies to mitigate the problem, ignoring community-driven initiatives.

Overall, the report ignores the potential of community food networks in localising and implementing the Sustainable Development Goals in Australia.²⁴

¹⁹ Smith, K, Fair Food Futures, 2022, <https://fairfoodfutures.com/about-sdgs/>

²⁰

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Foreign_Affairs_Defence_and_Trade/SDGs/Report/c05

²¹ Smith, K, Fair Food Futures, 2022, <https://fairfoodfutures.com/about-sdgs/>

²² <https://www.dfat.gov.au/sites/default/files/sdg-voluntary-national-review.pdf>

²³ Smith, K, Fair Food Futures, 2022, <https://fairfoodfutures.com/about-sdgs/>

²⁴ Smith, K, Fair Food Futures, 2022, <https://fairfoodfutures.com/about-sdgs/>

Government Policy

At least 14 federal departments and agencies govern or influence the food system, including on agriculture, fisheries, water, soils, food waste, health and obesity, and food research. This approach is causing challenges in governance, amplified by each state's own laws, regulations and bureaucratic structures. Regulatory compliance for the average farm equates to around 14 per cent of net farm profit, and probably more for service providers. Yet, despite the importance, complexity and cost of food policy, the Federal Government does not have a strategic, coordinated or integrated approach to governing the food system.²⁵

This major gap in governance and policy-making is causing inadequate and often contradictory program implementation across the Commonwealth, industry and society. The food system is strongly geared toward industry growth and export opportunities, with much less consideration for health, environmental sustainability and human welfare. Even with the focus on economic output, the current food system is costing the economy tens of billions of dollars and probably forgoing further billions in potential economic opportunity. And it leaves unresolved the major challenges that are impeding a functional food system, and while driving poor policy outcomes in other policy areas, such as rural infrastructure, indigenous communities, emergency management, animal welfare, poverty, education and cost of living.²⁶

A review of high-level strategic and policy documents from Federal Government departments that relate to food policy highlight a number of key issues:

- There are no whole of government policies that collectively address food production, supply, consumption, waste, food and water security
- Delivering Ag2030 puts the industry's target of \$100 billion sector by 2030²⁷ - it's all about growth and exports, with not a mention of food security.
- Lack of Health Department policies covering food and agriculture²⁸
- A focus on Innovation to drive productivity Via Agriculture Innovation Australia (AIA) the Australian Government committed \$2.8 million to AIA to develop investment prospectuses. These investment

²⁵ Commission for the Human Future | Policy Report: The Need for strategic food policy in Australia. Governing for a healthy, sustainable, economically viable and resilient food system 2021

<https://www.humanfuture.net/wp-content/uploads/2021/02/The-Need-for-Strategic-Food-Policy-in-Australia.pdf>

²⁶ Commission for the Human Future | Policy Report: The Need for strategic food policy in Australia. Governing for a healthy, sustainable, economically viable and resilient food system 2021

<https://www.humanfuture.net/wp-content/uploads/2021/02/The-Need-for-Strategic-Food-Policy-in-Australia.pdf>

²⁷ Australian Government Department of Agriculture, Fisheries and Forestry: Delivering Ag 2030

<https://www.agriculture.gov.au/agriculture-land/farm-food-drought/ag2030>

²⁸ Australian Government Department of Health and Aged Care <https://www.health.gov.au/about-us/what-we-do/policy#:~:text=Polices%20we%20work%20on&text=funding%20Australia's%20health%20systems%2C%20such,immuni sation%2C%20and%20preventing%20chronic%20disease>

prospectuses will have a focus on four priority areas – exporting agricultural products, championing climate resilience, biosecurity, and digital agriculture. None of which address Food Security.

- Concerningly, the Department of Foreign Affairs and Trade ‘*Australia’s Development Program: Agricultural development and food security initiatives*’ has the following Overview: The Australian Government is supporting stability and economic recovery by investing in agriculture and food security through a mix of global, regional and bilateral initiatives. The focus is entirely outside of Australia on international policies which have little to do with Australia’s food security.
- Shifting government policies and accountabilities have left a legacy of complexity of bureaucracy that impact change and agency (the 2023 Federal Budget included a commitment to the Investment Framework to include essential town water supplies in regional and remote communities and increased involvement of First Nations Peoples, but without urgency or accountability)²⁹, and if we are talking about essential water, how about essential food?
- The recommendations of related inquiries are not all accepted or implemented, for example, the 2020 *House of Representatives Standing Committee on Indigenous Affairs Inquiry into Food Pricing and Food Security in Remote Indigenous Communities*.
- First Nations perspectives, culture and way of life needs to be embedded in actions for sustainability and food security and health, rather than fragmented across multiple departments, agencies and policies (*The National Aboriginal and Torres Strait Islander Health Plan 2021–2031* was developed in consultation with First Peoples and Indigenous peak bodies but cross-sector approaches across all levels of government and the whole health system is required)
- While there is acknowledgement that food insecurity is directly related to poverty and disadvantage, increasing wages must be accompanied by an increase in income support
- There is a strong focus on food as an export and productivity growth, in place of or contradicting other key outcomes including food security, reducing food waste, ecological sustainability and health³⁰
- DAWE’s food related policy areas include: – Agriculture and drought management – Water management – Forestry and fisheries – Animal welfare – Export regulatory system – Grains research and development – Waste reduction and environmental management – Regulation of imported foods – Improving market access and maximising opportunities for agricultural exports – Fostering research and development collaboration to promote innovative practices in the agricultural sector – Delivering policies and programs to support profitable and resilient agribusinesses – Supporting the economy recovery post COVID-19³¹ We note there is no mention of food security, First Peoples, biodiversity, agroecology, distribution or local production.
- There is a lack of connection between food security and health (*Australian Institute of Health and Welfare Australia’s Health 2022* mentions food only in relation to accessible options and not cost or production)

²⁹ Water Services Association of Australia, *Closing the Water for Peoples and Communities Gap: Full Report* November 2022 <https://www.wsaa.asn.au/publication/closing-water-people-and-communities-gap-review-management-drinking-water-supplies>

³⁰ See ABARES, *Insights: Snapshot of Australian Agriculture* Issue 1, 2022.

³¹ Pratibha Naudiyal, Belinda Reeve, Alexandra Jones and Sally McDonald (2021), *Food policy in Australia: The role of different Federal Government organisations*. Sydney, New South Wales: The University of Sydney.

- There is an improved recognition of the needs of rural and remote communities, however a focus on extractive industries still remains (ABARES insights on food security do not include equitable access to food or culture. 71% of agricultural production is exported and irrigated crops account for over 90% of agricultural water use)³²
- It is promising to see ecosystem leadership and the strengthening of regions included in the *National Agricultural Innovation Policy Statement (2021)*³³ but there is a strong emphasis on attracting investment and export and the priorities are focussed on agribusiness rather than strategies to strengthen the food system and secure a national food security
- R&D, coordinated by industry bodies such as the *Grains Research and Development Corporation* prioritises the interests of large agribusiness, not smallholder sustainability serving local communities, despite requiring a grower levy
- There are inconsistencies with regard to Federal and State laws and between states. State responsibilities for health, natural resources, land use and native vegetation, for example, can impede a national strategy on food security
- The Department of Health, whilst being home to the National Preventative Health Strategy and the Australian Dietary Guidelines, focuses on food safety as its key legislative contribution. The Australia and New Zealand Food Standards Code provides standards on nutrient labelling to allow for informed choices, as if that is the most significant barrier to nutritional food. It is not responsible for compliance. Food Safety Standards do not address the nutritional quality of food production and supply
- Competing priorities can impede long term planning for sustainable development. The NSW *Minister's Planning Principles A Plan for Sustainable Development (2021)*, included “connecting with Country” and “addressing climate change”. The Planning Principles were only in force for two-weeks before being shelved to deal with housing supply, highlighting the need for national coordination.
- The Food Policy Index Scorecard for the Australian Federal Government indicates that there has been very little, if any work done in the following areas: support for community based interventions, independent health promotion agency, taskforce dedicated to nutrition and obesity, restrictions on marketing of unhealthy food, healthy food provision in public sector workplaces, health warnings on food packaging.³⁴ This is despite The Australian Government stating that it “is committed to improving the health and wellbeing of Aboriginal and Torres Strait Islander Australians. This is one of our most important priorities.”³⁵
- Environmental, planning and climate change laws are principally regulated through State and Territory limiting the extent to which local governments can consider issues such as nutrition or food

³² ABARES, *Insights: Australia Food Security* Department of Agriculture, Water and the Environment, Issue 3: 2020.

³³ <https://www.agriculture.gov.au/sites/default/files/documents/dawe-innovation-policy-statement.pdf>

³⁴ Sacks G, Mann D. Policies for tackling obesity and creating healthier food environments: scorecard and priority recommendations for the Australian Federal Government, October 2022. Melbourne: Deakin University, 2022

³⁵ Australian Government National Indigenous Australians Agency: Indigenous Affairs
<https://www.niaa.gov.au/indigenous-affairs>

security in their own planning activities.³⁶ For example, local governments under the NSW Act cannot refuse development consent to new fast-food restaurants seeking to open in an appropriately zoned area, and are limited in the extent to which they can diversify the mix of food retail outlets based on food access or nutrition concerns.³⁷ This means they are unable to address the issue of ‘food swamps’: geographical areas characterised by a high density of fast-food restaurants and other unhealthy food retail outlets, and a relatively low density of healthy food retail outlets (such as supermarkets), most often located in areas of low socioeconomic advantage.³⁸

Agroecology

Food Production that Cares for the Earth

Agroecology is defined as ‘a scientifically and experientially justified practice of agriculture that is sensitive to the ecosystems in which it is situated and that fosters the democratic participation of all peoples in the food system.’ It owes much of its theoretical underpinnings to Indigenous Peoples, and still its predominant practitioners are Indigenous Peoples and peasant smallholders the world over. Many of agroecology’s advocates make a strong case for relying on Indigenous knowledges of their land and systems to produce sufficient food sustainably. Agroecology fundamentally aims to promote the deep ecological, social, and economic knowledge of First Peoples, peasants, and other small-scale food producers and custodians of Land. It puts decision-making power back in the hands of Indigenous Peoples and peasants and local communities.

It is with these organising principles that AFSA promotes the need to not only consider Indigenous food and land management practices, but deeply engage with capacity to support healthy, diversified and culturally appropriate diets, and contribute to food security and nutrition while maintaining the health of ecosystems.³⁹

This is not to say that Indigenous food and land management practices will be a panacea for all the damaging practices in the current food security in Australia. However, it is critical to acknowledge that colonisation and disruption of Indigenous food and land management practices occurred in a coeval manner, and Indigenous peoples have been forced into the margins and denied access to traditional cultural practices, leading to a sharp, steady, and ongoing decline in the health of the diets of Aboriginal and Torres Strait Islander Peoples.

³⁶ Christine Slade, Claudia Baldwin and Trevor Budge, ‘Urban Planning Roles in Responding to Food Security Needs’ (2016) 7(1) *Journal of Agriculture, Food Systems, and Community Development* 33–48; Maureen Murphy, Hannah Badland, Helen Jordan, Mohammad Javad Koohsari and Billie Giles-Corti, ‘Local Food Environments, Suburban Development, and BMI: A Mixed Methods Study’ (2018) 15(7) *International Journal of Environmental Research and Public Health*, 1392. Available from: doi:10.3390/ijerph15071392.

³⁷ Slade, Baldwin and Budge, above n 4.

³⁸ Cindy Needham, Gary Sacks, Liliana Orellana, Ella Robinson, Steven Allender and Claudia Strugnell, ‘A Systematic Review of the Australian Food Retail Environment: Characteristics, Variation by Geographic Area, Socioeconomic Position and Associations with Diet and Obesity’ (2020) 21(2) *Obesity Reviews*, e12941. Available from: doi.org/10.1111/obr.12941.

³⁹ <https://www.fao.org/agroecology/knowledge/10-elements/culture-food-traditions/en/>

The Importance of Agroecology

AFSA members practise regenerative and sustainable farming practices, many of which come under the term 'agroecology'. As the Nyéléni Declaration states, agroecology is a key element in the construction of Food Sovereignty (2015).

While regenerative agriculture has gained momentum and prominence in Australia, agroecology is much less well-known or understood here, though there is a deep and substantial literature (and movement) internationally. The term agroecology was coined by Russian agronomist Basil Bentsin in 1930, and the practice emerged as more of a social movement in Mexico in the 1970s in resistance to the Green Revolution⁴⁰.

The democratic and ecological potential of agroecology and its political expression in food sovereignty has been well canvassed for decades. There's been an explosion of publications in the last decade that coincided with the UN Food and Agriculture Organisation (FAO) launching of a process and series of global and regional symposia on agroecology in 2014⁴¹. Agroecology's place within the concept of 'nature's matrix,' in which biodiversity, conservation, food production and food sovereignty are all interconnected goals⁴² represents a stark contrast to 'land-sparing' arguments that posit humans as separate from and antithetical to the health of functional ecosystems⁴³. This debate recently played out in the UN's work on development of the post-2020 Global Biodiversity Framework (GBF), resulting in the inclusion of agroecology in Target 10 of the Kunming-Montreal GBF last month.

Approaches like 'climate-smart agriculture' or 'nature-based solutions' address just some aspects of the crisis in the food system and largely re-entrench the inequity and ecological degeneration that is so characteristic of today's food system. In contrast, agroecology explicitly enhances bottom-up processes of development and food system transformation based on the needs, knowledge, priorities and agency of people and nature, rooted in territories⁴⁴.

The 10 Elements of Agroecology

Diversity: diversification is key to agroecological transitions to ensure food security and nutrition while conserving, protecting and enhancing natural resources.

⁴⁰ Gliessman 2013; Giraldo and Rosset 2017

⁴¹ Agarwal 2014; Alonso-Fradejas, et al. 2015; Rosset and Altieri 2017

⁴² Chappell 2017, 2019; Montenegro de Wit 2020

⁴³ Gliessman 20016; Philpott, et al 2008; Perfecto and Vandermeer 1995; Perfecto, Vandermeer, and Wright 2009; Liebman, et al 2020

⁴⁴ <https://www.actionaidusa.org/wp-content/uploads/2021/12/Shifting-Funding-to-Agroecology.pdf>

Co-creation and sharing of knowledge: agricultural innovations respond better to local challenges when they are co-created through participatory processes.

Synergies: building synergies enhances key functions across food systems, supporting production and multiple ecosystem services.

Efficiency: innovative agroecological practices produce more using less external resources.

Recycling: more recycling means agricultural production with lower economic and environmental costs.

Resilience: enhanced resilience of people, communities and ecosystems is key to sustainable food and agricultural systems.

Human and social values: protecting and improving rural livelihoods, equity and social well-being is essential for sustainable food and agricultural systems.

Culture and food traditions: by supporting healthy, diversified and culturally appropriate diets, agroecology contributes to food security and nutrition while maintaining the health of ecosystems.

Responsible governance: sustainable food and agriculture requires responsible and effective governance mechanisms at different scales – from local to national to global.

Circular and solidarity economy: circular and solidarity economies that reconnect producers and consumers provide innovative solutions for living within our planetary boundaries while ensuring the social foundation for inclusive and sustainable development.

The potential of agroecology in contributing to food sovereignty (and ergo food security) 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.

National production, consumption and export of food

Indigenous food and land management practices

Key issues

Custodial Ethic

It is AFSA's position that Indigenous knowledges and food and land management practices should be prioritised, embraced and incorporated in a substantive sense into all proposed policy reforms for food security in Australia.

Aboriginal and Torres Strait Islander Peoples recognise that ‘the land is the Law’ from which everyone and everything is derived, which creates a ‘custodial ethic’ where everyone has an obligation of care for Country and all that it supports. Food production and consumption therefore become centred on an ethic towards caring for the land in a holistic sense. Waste is not a concept that is shared in Indigenous knowledges. The import of capitalist modes of production has created over-production, needless waste and harmful effects on the environment through excessive resource use. These have become unjustifiable in the context of climate change as highlighted in multiple IPCC reports.

A part of the urgent need for truth-telling of the impacts of colonisation on land, water and biodiversity in Australia is the story of our food systems. It is a catch-all, in that all relate to the production of food. The need to value, recognise and adopt Indigenous land and water management practice is therefore manifest.

“Valuing the earth and the raw materials it provides for us is central to conservative economics. What is smart about eliminating the resource? Every product we use must be stamped with our determination that our great-grandchildren can enjoy them in the future. This means our care must be extended to soil, water, food and the products we have created from the resources of the earth.”⁴⁵

Amongst the issues facing First Peoples, of particular concern from the food sovereignty perspective is the impact of biodiversity decline on traditional food gathering. Biodiversity decline is the loss of variety in living systems. Decline can be measured through a number of characteristics: it can be decline in the number and range of species in a particular region, the loss of genetic diversity within populations of individual species, or more broadly, the loss and simplification of ecosystems.⁴⁶

Biodiversity Loss on Aboriginal Country

Australia has experienced the largest documented decline in biodiversity of any continent over the past 200 years. Even with the existence of the *Environment Protection and Biodiversity Conservation Act (1999)*, more than 50 species of Australian animals have been listed as extinct, including 27 mammal species, 23 bird species, and four frog species. The number of known extinct Australian plants is 48. Australia’s rate of species decline continues to be among the world’s highest, and is the highest in the OECD⁴⁷.

Biodiversity is safeguarded where Indigenous practices of land management are prioritised and Indigenous peoples are the main or equal decision-makers in managing the land. The example of fire has gained attention in recent years, particularly since the Black Summer bushfires of 2019-2020. “Fire is a

⁴⁵ Gammage, B. Pascoe, B. 2021 *Country. Future Fire, Future Farming*.

⁴⁶ The Peoples Food Plan, Australian Food Sovereignty Alliance, 2013. https://afsa.org.au/wp-content/uploads/2012/11/AFSA_PFP_WorkingPaper-FINAL-15-Feb-2013.pdf

⁴⁷ The Peoples Food Plan, Australian Food Sovereignty Alliance, 2013. https://afsa.org.au/wp-content/uploads/2012/11/AFSA_PFP_WorkingPaper-FINAL-15-Feb-2013.pdf

necessary practice for hunting, but the practice also protected certain plant and animal habitats and kept the country sweet. Flowering plants are seasonal reminders for First Peoples to know what needs to be done to manage the land; and this information is passed down to the next generation". While underway in many parts of the country, Djaara through the Dja Dja Wurrung Clans Aboriginal Corporation and their land management branch 'Djandak' are seeing the positive ecological and health benefits of practising dhelkunya dja / making Country healthy through cultural burns.⁴⁸

The UN provides evidence that, globally, Indigenous Peoples and local communities are the best custodians of biodiversity. This is well-founded in literature regarding food production, and is a key organising principle of agroecology and the food sovereignty movement.

Legal Recognition

It is important that any consideration of Indigenous food and land management practices 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 the Federal Government 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.⁴⁹

The First Nations Bushfood and Botanical Alliance Australia issued a Statement in 2019 asserting sovereignty over native foods and the right to participate in decision making:

As custodians of our Country, we must take a leadership role. We must be included in any development of our native plants and animals in the bushfood, botanical, agricultural and medicinal and therapeutic industries. We believe that our effective participation in the industry, its growth and development has the power to bring social, cultural, economic and environmental benefits for all. Our leadership, bringing our Knowledge systems and values, will make a strong contribution to food security and a sustainable future for country and people – as it has for generations before us.⁵⁰

⁴⁸ See <https://www.abc.net.au/news/2020-05-30/destined-for-failure-unless-indigenous-cultural-burns-done/12302412>.

⁴⁹ <https://www.abc.net.au/news/2021-09-15/native-title-fishing-raises-issues-over-land-use/100452546>

⁵⁰ First Nations Bushfood & Botanical Alliance Australia: Statement from the National Indigenous Bushfood Symposium, 2019 <https://www.fnbbaa.com.au/bushfood-symposium-statement-firstn>

We don't need to adopt all Aboriginal methods, but in this time of water, soil and farm-income crisis, it would seem a prudent management approach to consider the condition of the country at the time of invasion.

Recommendations

AFSA recommends the Committee and the Federal Government:

- Apply a rights based framework to Indigenous food and land management, and across the food system more broadly, by fulfilling the obligations outlines in the Nagoya protocol and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP)
- Support the First Nations Bushfood and Botanical Alliance Australia Statement⁵¹ and ensure First Peoples are the leaders of policy and decision making in relation to food and land management:
- Changes to the law: Indigenous Knowledge in bushfoods and bush products should be protected by the laws of this land and business practice. This includes intellectual property; penalties for misappropriation and implementation of the Nagoya Protocol on Access and Benefit Sharing.
- Education and Awareness: promote respect for our Indigenous Knowledge values and protocols.”⁵²
- Enact legislation to ensure First Peoples’ knowledge is acknowledged and compensated in the Bush Food industry in line with the Nagoya Protocol⁵³
- Learn from other jurisdictions e.g. Victorian Traditional Owner Native Foods and Botanical Strategy⁵⁴, Queensland’s Biodiscovery Regulation (2021)⁵⁵ to develop a coordinated national strategy Self-determination for First Peoples to provide unfettered access and management of Country - starting with all public lands:
- Embed First Peoples’ food, land and fire management practices in all Indigenous Land Use Agreements and National Parks, above and beyond Native Title determinations
- Increase funding and training opportunities for First Peoples rangers and custodians to care for Country
- Conduct culturally appropriate consultation and include First Peoples’ input in the development of land and water resource management and planning
- Self-determination for First Peoples to provide unfettered access to Country - increase access to private lands:
 - Support partnerships between First Peoples and private landholders to give access to Country for social, cultural and economic purposes

⁵¹ First Nations Bushfood & Botanical Alliance Australia: Statement from the National Indigenous Bushfood Symposium, 2019 <https://www.fnbaa.com.au/bushfood-symposium-statement-firstn>

⁵² First Nations Bushfood & Botanical Alliance Australia: Statement from the National Indigenous Bushfood Symposium, 2019 <https://www.fnbaa.com.au/bushfood-symposium-statement-firstn>

⁵³ <https://www.cbd.int/abs/>

⁵⁴ <https://www.fvtoc.com.au/native-foods-and-botanicals>

⁵⁵ <https://www.legislation.qld.gov.au/view/html/inforce/current/sl-2021-0131#sec.2>

- Introduce a property tax to 'Pay the Rent'⁵⁶ directly to Indigenous led organisations in appropriate Country.
- Invest in increasing understanding of First Peoples knowledges and land management by:
 - Providing funding for horizontal knowledge exchanges between First Peoples and farmers
 - Provide funding for all Australians to undertake First Peoples cultural education
 - Indigenous Country names to be identified on Land Taxes
 - Develop a Traditional Knowledge Code of Practice in consultation with Indigenous communities to require benefit-sharing negotiations

Preserving Agricultural Land

Australia is a federal country divided into six states and two self-governing territories. Below the state level, 571 municipalities exist. As land use is not explicitly discussed in the constitution, states have most responsibility for land-use planning (based on the principle that powers not assigned to the federal government by the constitution reside with the states). The national government has limited responsibilities related to land-use planning, however, most importantly, it can influence land use through environmental regulations. Furthermore, it directly controls land use in selected areas, such as national parks.⁵⁷

Local Government Authorities are the most important actors involved in land-use decisions due to the responsibilities that are given to them by the states. They are primarily responsible for drawing up and approving local land-use plans that determine permitted development. Furthermore, they prepare related zoning regulation and can issue other ordinances to influence the built environment within their jurisdictions⁵⁸

Key issues

Loss of agricultural land and water resources across the states and territories will have permanent and irreversible negative impacts on the ability of Australia to produce and supply food to its citizens.

Land

We are losing our agricultural land to urban sprawl, housing development and extractive industries, including mining.. If we are to continue to grow food, these lands must be identified and held for agricultural (specifically food production) use.

⁵⁶ <https://paytherent.net.au/>

⁵⁷ OECD, The Governance of Land Use, Country Fact Sheet, Australia <https://www.oecd.org/regional/regional-policy/land-use-Australia.pdf>

⁵⁸ OECD, The Governance of Land Use, Country Fact Sheet, Australia <https://www.oecd.org/regional/regional-policy/land-use-Australia.pdf>

'Employment Lands' are defined in a number of State Governments⁵⁹ including NSW, SA and WA and we believe the same could be done for 'Food Lands' to specifically define areas dedicated to our food production and therefore security. The Federal Government conducts thorough geospatial mapping exercises to identify "prime agricultural land" or 'Strategic Agricultural Land'. AFSA encourages the Government to further protect these selected areas, to expand them beyond notions of 'prime' to all agricultural lands, and to strengthen its efforts to identify 'Food Lands'.

Previous UTS and SPUN research has essentially mapped where current and potential food producing areas are located around Sydney, and Melbourne Foodprint for Melbourne. Below we offer some insights from the Sydney research:

In the range of scenarios modelled, the first assessed what would happen if Sydney's agriculture was not protected and the proposed population growth under the Metro Strategy occurred in an unconstrained way. If the urban sprawl scenario continues uninterrupted, Sydney stands to lose approximately 60% of its total food production by 2031. Vegetables, meat and eggs will be hardest hit: 92% of Sydney's current fresh vegetable production could be lost, 91% of meat and 89% of eggs.⁶⁰

This project found that this is directly caused by the current planning system, which tends not to prioritise agriculture as a land use, meaning urban sprawl into peri-urban areas is permitted. The scenario was based on Sydney's metropolitan strategy, [A Plan for Growing Sydney](#), which allocates new population growth to each local government area, and concentrates urban growth around North West and South West Growth Centres. Consequently, loss of fresh food production is greatest in Wollondilly, Liverpool, Penrith and Hawkesbury areas.

As a consequence of this loss of agricultural land to urban expansion, coupled with 1.6 million extra mouths to feed, food production in the basin would only be able to feed 6% of Sydney instead of the current 20%.

The third scenario prioritised agriculture, and predicted the result of the proposed population growth under the Metro Strategy if it occurred in a constrained way, such that current urban development could intensify to high density, but not expand onto existing agricultural land. This scenario essentially protects the current agricultural base, in terms of production. If we choose a pattern of urban development that involves densification – that is, utilising the existing urban areas better, growing up instead of out, we could continue to produce around half a million tonnes of food a year. Although importantly, as a proportion of Sydney's growing food demand, food production declines, to only meet 14% of Sydney's demand.

⁵⁹ <https://www.planning.nsw.gov.au/Research-and-Demography/Employment-Lands-Development-Monitor>

⁶⁰ <https://www.uts.edu.au/isf/explore-research/projects/peri-urban-farming-key-sydneys-food-future>

Recommendations

- National harmonisation of land use controls to ensure food security.
- Develop mechanism to financially account for loss of soil, carbon, and water from industrialised food and agricultural systems by building this cost into food prices through taxation
- Support the farming and utilisation of urban land for food production; prioritise green belts at the edges of major cities for sustainable food production over other competing or conflicting uses
- Map all agricultural land, and protect it from mining and housing development
- Identify and define 'Food Lands' and legislate that they must be used such as, as is the case in France

Food as an export

Key issues

Export as an issue

Exports and growth are the current focus of Australian policymakers and large-scale farmers, and they are also at the root of the environmental, social, and economic issues we face. Australian farmers produce 93 per cent of Australia's food, even while exporting some 70 percent 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 offshore⁶¹. 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'⁶².

*The focus on growing more has made agribusiness input companies and food processors rich, but keeps many farmers chasing their tails, which can result in their land condition going backwards. Buy more land, buy more machinery, take on more debt, require more inputs and then buy more land. Ad infinitum.*⁶³

Post-invasion Australian farms have swung between very large operations owned by squatters to smaller family farms encouraged by government land acts to increase food production for export. Australian governments, big agribusiness and many farming advocates have been singing the productivity song for a long time. These messages accelerated in the financial deregulation of the 1980's. Get big or get out. Produce more with less. Buy bigger machinery. Grow more tonnes.

⁶¹ ABARES 2021

⁶² Muir 2014: 5

⁶³ Chan, Gabrielle. 2021. Why you should give a f*ck about farming

*Trade in futures. Trade in water. Get rid of your collectives, cooperatives and single-desk trading platforms.*⁶⁴

AFSA affirms the following:

*The promoters of the capitalist world order realise that food sovereignty is an idea that impinges on their financial interests. They prefer a world of monoculture and homogenous tastes, where food can be mass-produced using cheap labour in faraway factories, disregarding its ecological, human and social impacts. They prefer economies of scale to robust local economies. They choose a global-free market (based on speculation and cut-throat competition) over solidarity economies that require more robust territorial markets (local peasant markets) and active participation of local food producers. They prefer to have land banks where industrial-scale contract farming would replace small-holder producers. They inject our soil with agro-toxics for better short-term yields, ignoring the irreversible damage to soil health. Their trawlers will again crawl the oceans and rivers, netting fishes for a global market while the coastal communities starve. They will continue to try to hijack indigenous peasant seeds through patents and seed treaties. The trade agreements they craft will again aim to bring down tariffs that protect our local economies.*⁶⁵

Localisation of Food Systems

Against the social and ecological crises brought on by agricultural systems that are geared towards productivity and exports, localisation is considered the antidote for many of the current and future challenges we face to feed growing populations under an increasingly volatile and inhospitable climate.

In her book *'Who Really Feeds the World: The Failures of Agribusiness and The Promise of Agroecology'*, Vandana Shiva explains the social and ecological value of local food systems, from the Arctic to rainforests:

“Two principles have shaped the evolution of food systems across the world. The first is that everyone must eat. The second is that every place where human beings live produces food. Between these two principles, the food systems that have evolved to nourish people are, by their very nature, local. These systems of food production nourish both biological and cultural diversity. The localisation of food is not only natural but vital, because it allows farmers to practice the Law of Return, produce more food through biodiversity, create food systems adapted to local cultures and ecologies, and nourish themselves, their communities and the soil that they give back to⁶⁶.”

⁶⁴ Chan, Gabrielle. 2021. Why you should give a f*ck about farming

⁶⁵ <https://viacampesina.org/en/food-sovereignty-a-manifesto-for-the-future-of-our-planet-la-via-campesina/>

⁶⁶ Shiva, V. (2016). *Who Really Feeds the World: The Failures of Agribusiness and The Promise of Agroecology*.

- Get big or get out - this encourages monoculture, overproduction and stripping the environmental resources of the land. It requires produce to be shipped long distances.
- Export as a growth model - we should only be producing what we need, exporting is raiding our soils and water, effectively exporting our nutrients and reducing the natural resources left in Australia.

In Australia, and elsewhere, community food networks such as urban gardens, community supported agriculture, farmers' markets, organic cooperatives, food charities and 'fair food' organisations are important civil society stakeholders, who actively confront these inequalities within food systems.

These organisations emphasise equitable access to food that is ecologically sustainable, healthy and fairly produced, exchanged and consumed – widely understood as food justice. This idea differentiates them from food security approaches focused on producing more food and provides a potentially progressive framework for thinking about alternative food futures. They are examples of food utopias that we can learn from. And they are growing.⁶⁷

Recommendations

- Federal Government Policy needs to be re-aligned with food security and ecological issues as part of a Food Policy focus: Local food first, not export driven growth
- Federal Government needs to recognise that growth driven by export has negative environmental, social and economic impacts.
- Federal Governments need to recognise that Exports interfere with the food sovereignty of other nations by competing with their locally produced food and affecting their long term food security
- Federal Governments need to recognise that Exports contribute to climate change through excessive use of national resources to ship product across the globe

⁶⁷ Smith, K, Fair Food Futures, 2022, <https://fairfoodfutures.com/about-sdgs/>

Food & Agriculture Systems Planning

Key Issues

We need to devise a food plan that looks at the Country as a whole and determines our population projections of how much food is necessary to sustain ourselves into the future and how diverse our food systems should be - in what it produces, in who produces it and where they live. This plan would identify and protect the best food production land and intertwine with the national reserve system that maps conservation areas across the country. It would identify high-value conservation areas and prime agricultural land as no-go zones for development like housing and mining.⁶⁸

The COVID-19 pandemic laid bare the vulnerabilities in food systems across the world, particularly exposing the risks inherent to a globalised food system with highly centralised processing and distribution infrastructure. The Black Summer fires of 2019-20 and subsequent 2022 catastrophic floods here in Australia, and parallel natural disasters and wars across other parts of the globe continue to bring these lessons home, underscoring the urgent need to transform our food and agriculture systems to more localised and regionally autonomous economies that focus on feeding local communities.

Part of this transformation must include a focus on support for small- and medium-scale farms, food manufacturers, processors, and distribution systems, and a move away from the profit-driven motivations for increased exports. Achieving this transformation will require political will and detailed planning. We here highlight some of the key areas to be addressed to ensure Australia is planning for a resilient, efficient and productive food and agriculture systems that address food security systemically rather than in piece-meal reactions to inequitable and failing systems.

Duplication of effort across regulatory systems

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.

For example, at the state government level, the Victorian Government has a specific meat regulator that creates increased regulatory burden and duplication of effort, such as conducting quarterly audits of butchery facilities, compared to an annual audit in New South Wales and Queensland. Furthermore, Victoria is in contrast to 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 recommends a review of 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

⁶⁸ Chan, Gabrielle. 2021. Why you should give a f*ck about farming

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.

Regulatory reform should always be conducted through a transparent and participatory approach which identifies the priority needs of small-scale farmers, and which uses measures already available in the food regulatory system to prevent outbreaks.

1. Consult with producers with regard to the cost and administrative impact of any of government reforms;
2. Identify and improve any current regulatory and non-regulatory measures that can be improved, rather than adding more costly and burdensome steps for producers and processors;
3. Provide the expected assurances to low-risk producers that there will be exemptions that apply to them should any new regulatory measures be put in place

Any risk-management measures considered should target the known source of outbreaks, namely large-scale, intensive operations and sections of the processing industry engaged in the export and import of agricultural products. Appropriate assessments of the relationship between scale, production methods, supply chain length and logistics, and risk should be a priority.

Increased land use conflict, inflated land prices and lengthy and expensive planning requirements due to competing interests and competing urban land uses and increasing global competition impact on small farmers and local supply chains, reducing food security for regional and rural communities in particular. The Primary Production Zones must maintain the objectives to preserve land for agricultural use, 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 major cities and regional cities.

Land Trusts

Farmland and community land trusts can be used to preserve agricultural land into the future, preventing development for other purposes that might threaten community and national food security and local food sovereignty. A farmland trust is a 'private, non-profit organisation that preserves farms' and arable land. Farmland trusts are registered legal entities, which may or may not have charitable status, depending on the jurisdiction in which they are incorporated. They also vary in scale, with some operating at local level, others regionally or nationally. Typically the ownership structure of smaller-scale farmland trusts provides for a wide degree of community participation.

There are many well-developed and successful models of such trusts in North America and the United Kingdom, which provide examples for Australia, such as the Vancouver Agricultural Land Reserve, the Fordhall Farm, the American Farmland Trust, the Agrarian Trust, and the Kindling Trust. A thorough review of farmland trusts operating in Canada, the United States and the United Kingdom was published in 2010 by the Land Conservancy of British Columbia and Farm Folk City Folk, and another covering North America was published by the American Farmland Trust.⁶⁹

⁶⁹ https://www.landcan.org/pdfs/LT_Report_Finalx_with_attachments.pdf

Food-sensitive planning and urban design (FSPUD)

The pressures of a growing population must be dealt with in the residential suite of zones, not in Primary Production, Rural Landscape, and Primary Production in Small Lots zones. This is especially critical in the face of the negative impacts of climate change on Australia's capacity to grow food on the limited arable land available, most of which is concentrated around cities. If State and Local Governments continue to allow inappropriate encroachment and urban growth into viable farm land, future generations will become food insecure. A food secure and food sovereign future depends on appropriate planning controls that preserve farmland in perpetuity.⁷⁰

The University of Melbourne's *Foodprint Melbourne* report highlights that Melbourne's "foodbowl" is an important building block in a resilient and sustainable food future for the city. The report summarises project findings about what grows in Melbourne's foodbowl and what it takes to feed the city, and it outlines the economic value generated by Melbourne's foodbowl. The report highlights that:

- The loss of Melbourne's foodbowl is not inevitable as the city grows if growth on the city fringe can be limited to existing growth corridors and strong targets are set for urban infill and increased urban density; and
- Melbourne can plan for a resilient city foodbowl that provides healthy food for a growing population, promotes a vibrant regional food economy and acts as a buffer against future food system shocks.

Peri-urban areas have been targeted as future growth spots, which endangers precious prime agricultural land previously reserved for food production. The increased restriction of rural activities close to cities and conflict over land use also raises issues among small producers, for the impacts of rural development in these areas has been bundled into one collective issue rather than one to be managed based on intensity of the culpable industries.

Food Sensitive Planning and Urban Design (FSPUD) aims to help local and state government planners create multidimensional and multi-functional food systems that enhance human and environmental well-being. FSPUD sets out ten mutually-reinforcing principles to underpin the development of sustainable, resilient and fair food systems.

1. Support secure and equitable access to the Food necessary for a healthy and fulfilling life.
2. Make healthy and sustainable Food choices easy and convenient choices.
3. Encourage use of spaces and places to meet many diverse needs, reconciling Food production and exchange with housing, enjoyment of open spaces and recreational areas, urban cooling, skills and jobs, socialising and community celebration.

⁷⁰ Maps created by Sydney Food Futures (2015-2016): <https://www.uts.edu.au/research-and-teaching/our-research/institute-sustainable-futures/news/future-sydneys-food-bowl> Accessed via: <http://www.sydneyfoodfutures.net/>

4. Provide opportunities for those who wish to participate in growing, exchanging, cooking and sharing Food.
5. Identify and invest in the safe use and re-use of urban resources (soil, water, nutrients, 'waste') that can support viable and sustainable Food production.
6. Protect and / or enhance urban and surrounding ecosystems and increase biodiversity (including, but not limited to, bees, open-pollinating fruit trees, native vegetation).
7. Ensure decisions reflect the long-term value and broader community benefits of access to productive land and experienced producers.
8. Encourage investment and innovation, through secure tenure and supportive operating environments for both community and commercial Food enterprises.
9. Increase resilience, by designing to keep options open for future use of space and resources.
10. Acknowledge and support diversity and sovereignty (the right to have informed choices)

Recommendations

AFSA recommends the Australian Government implement the following to address food system governance and planning:

- The creation of a national, integrated Food Sovereignty Plan that addresses sustainability, health, equity, and economic development in an integrated way.
- A 'food in all policies' approach where food systems and food sovereignty are integrated into all relevant areas of government policy, with a coordinated approach developed on existing government policies on food production, distribution, sale, marketing, and consumption. This approach would be based on a holistic understanding of where our food comes from, who produces it, and how, as well as the interconnections between agricultural inputs, food production, processing, distribution, retail, marketing, and consumption. This requires better communication and collaboration between producers, processors, food and agri-businesses, consumers, planning, and policy makers at all levels of government.
- New policies on the food system should be informed by a rights-based approach. There is scope for considering how a rights-based approach could be woven into relevant legislation, policies, and programs, including those on education, food procurement, and measures to limit how the lobbying, marketing and selling practices of large, transnational food companies affect public health. This approach could be informed by international guidance from the UN Special Rapporteur on the Right to Food, and the UNSR on the Right to Health.
- Following from the approach outlined above, a helpful starting point for the Inquiry would be to map the Federal and State Government laws, regulations, and policies that address the food system, including those that are directly concerned with food, as well as those that have an impact on the healthiness, sustainability, and equity of the food system, such as laws and policies on urban planning, agriculture, labour, and housing. This would help to identify opportunities for the creation of new legislative and policy mechanisms that address the issues raised by the inquiry, as well for legislative and policy amendment and harmonisation.

- Processes of legislative and policy development concerned with the food system should be protected from inappropriate influence by large, corporate actors in the food and agriculture sectors. This could include, for example, adopting recommendations for limiting industry influence and improving transparency in food system policy making (The Australian Prevention Partnership Centre, Deakin University and INFORMAS 2019). Approaches could include:
 - Introducing real-time declarations of political donations
 - Modifying the government lobby register to require more detailed reporting, including details of specific lobbying activities; and
 - Adding food manufacturers (and associated entities) to the list of prohibited political donors
 - Integrate food system thinking into planning frameworks, policies and implementation (look to examples in Canada⁷¹, Brazil⁷², and Ecuador⁷³)
- Strengthen efforts to identify 'Food Sheds' by consulting with shires and taking into consideration research by UTS, SPUN, and Food Futures Sydney in relation to peri-urban planning.
- Enable zoning for smaller, localised food production and associated processing and distribution infrastructure with targeted reforms of SEPPs
- Implement Food-sensitive planning and urban design (FSPUD)

Food security and equitable access to food

Key issues

Food insecurity in Australia

An accurate picture of food security in Australia is hampered due to inconsistent and infrequent data collection, but the prevalence of food insecurity is growing. The *Foodbank Hunger Report* (2021) includes a spectrum of experience from reductions in the quality, desirability and variety of diet to disruptions in food intake and eating patterns. On this basis a quarter of Australian adults (28%) can be categorised as food insecure. One in six Australians (17%) are severely food insecure, skipping meals, cutting down on the size of their meals and sometimes going a whole day without eating at least once a week. 1.2 million children are living in food insecure households.⁷⁴

⁷¹ <https://foodsecurecanada.org/people-food-policy>

⁷² https://www.inter-reseaux.org/wp-content/uploads/Note_FaimZe_ro_Sept2012_EN_vp.pdf

⁷³ https://www.tni.org/files/download/50_giunta_2013_0.pdf

⁷⁴ <https://reports.foodbank.org.au/wp-content/uploads/documents/2021-Foodbank-Hunger-Report-PDF.pdf>

The rate of food insecurity has increased throughout the COVID-19 pandemic⁷⁵. Research based on lived experience and community feedback in Aboriginal communities across NSW found “in some rural and remote areas, local shops are pushing up their prices, and people are left with no choice but to buy cheaper (and often less healthy) options to feed their families. Increase in government payments has resulted in the one and only shop in the community providing food, jamming their prices up.”

There has been an increase in food insecurity in cities and urban areas evident⁷⁶ by an increase in demand for food relief. Australians aged 18-25 years comprise 65% of Australians experiencing food insecurity, as the COVID-19 pandemic has disproportionately impacted individuals who typically work casual part-time jobs, which will have long term repercussion on their employment and career prospects⁷⁷. Emergency food relief cannot always provide the food to meet nutritional requirements or cultural food preferences. Food relief agencies reported insufficient quantities of vegetables (44%), quality foods (55%), foods for special dietary requirements and cultural groups (23%).⁷⁸ Emergency food relief does not meet international obligations to ensure the human right to adequate food.

4 million Australians, or 18% of the population, experience food insecurity at some point. Only half of these people ever seek food relief and only a third of the charities are currently meeting the full needs of the people they see. Most charities are forced to turn people away empty handed due to lack of food and resources. There is an urgent need to ensure that the food relief sector is operating at its most efficient and effective to meet the need.⁷⁹

Despite producing most of our food for domestic consumption and exporting up to 70% of our agricultural produce, the vulnerability of Australia’s supply chains was laid bare by the pandemic and recent flooding events. The Intergovernmental Panel on Climate Change has warned that extreme weather events will become more frequent and severe in Australia⁸⁰, and this demands a more resilient food system. The average storage capacity of a supermarket is only one day’s worth of fresh products, says Jan Willem van der Schans, senior researcher of new business models at Wageningen University and Research. This supply chain needs a buffer and governments can no longer rely on big food to shore up supply chains or relief agencies to provide emergency food.⁸¹

Right to Food

⁷⁵ S. Louie, Y. Shi, M Farinelli. The effects of the COVID-19 pandemic on food security in Australia: A scoping review. *Nutrition and Dietetics*. 2022; 79(1): 28-47. <https://onlinelibrary.wiley.com/action/showCitFormats?doi=10.1111%2F1747-0080.12720>

⁷⁶ Craven & Meyer 2020, ‘The impact of COVID-19 on food insecurity in the Greater Sydney and Illawarra Region’ <https://righttofood.org.au/wp-content/uploads/2020/10/The-impact-of-COVID-19-on-food-insecurity-in-Greater-Sydney-and-Illawarra-region-September-2020.pdf>

⁷⁷ (Foodbank Australia & McCrindle Research 2020; McKay & Lindberg 2019)

⁷⁸ FH McKay, A Bastian, R Lindberg. Exploring the response of the Victorian emergency and community food sector to the COVID-19 pandemic. *J Hunger Environ Nutr*. 2021; 16(4): 44-461. doi:10.1080/19320248.2021.1900974

⁷⁹ Food Bank National Food Security Strategy, 2019 <https://www.foodbank.org.au/national-food-security-strategy/?state=vic>

⁸⁰ <https://www.ipcc.ch/>

⁸¹ <https://www.bbc.com/future/bespoke/follow-the-food/how-covid-19-is-changing-food-shopping.html>

Australia is a laggard in constitutionally recognising the Right to Food. As a signatory to the United Nations (UN) Covenant on Economic, Social and Cultural Rights (1975), Australia is required to take proactive steps to ensure food security, through ‘respecting, protecting and fulfilling’ the right to food.⁸² The Right to Food is well-established globally, aided by the special mechanisms of the UN, which has been appointing Special Rapporteurs on the Right to Food for over three decades.⁸⁴

AFSA asserts food production and supply and the intended social, economic and environmental outcomes should be based on a human rights framework. The ability to achieve food sovereignty requires people to have access to fresh, ethical and ecologically-sound, localised food production, distributed through short and decentralised supply chains. States including South Africa, Kenya, Switzerland, Bolivia, Ecuador, Mexico and Brazil have made constitutional provisions [guaranteeing the right to food](#), albeit with varying success.⁸⁵

Brazil has a long-standing ‘food-as-a-right’ policy, and in Belo Horizonte (a city of 2.7 million people) a city agency was created to oversee dozens of innovations, weaving together interests of farmers and consumers to assure that every citizen had the right to food.⁸⁶

Within six years, initiatives such as the Bolsa Familia cash transfer scheme for low-income families, free meals in every public school, and support to small-scale family farming had reduced the number of people facing food insecurity from 50 million to 30 million. Many of the programmes implemented under Zero Hunger were pioneered in the 1990s in the Brazilian city of Belo Horizonte.

Food Literacy

Australian adults and children are disconnected from where their food is grown and produced, education is a key component of improving access to healthy and appropriate food. Experiential learning is based on ‘learning from life experience’, rather than using didactic or theoretically based teaching methods. In the USA, farm visits are a primary mode of experiential school-based nutrition learning provided through the federally funded USDA Farm to School grant programme, with high uptake of this programme. The USDA

⁸² Article 2 of the International Covenant on Economic, Social and Cultural Rights (ICESCR).

⁸³ 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>>.

⁸⁴ Food and Agriculture Organization (2012b), Right to Food Timeline, Legal Office, Food and Agriculture Organization of the United Nations, archived from the original on 6 June 2012. <<https://www.webcitation.org/68Cm7UmiN>>

⁸⁵ Alana Mann, 11 April 2016, What does the human right to food mean for Australians living in food poverty?, Opinion, <<https://sydney.edu.au/news-opinion/news/2016/04/11/-the-right-to-food---and-how-1-2-million-australians-miss-out.html>>

⁸⁶ Chappell, J. 2018. *Beginning to End Hunger*. UC Press.

Farm to School programmes include garden education, local procurement for school foods and experiential learning activities in agriculture, food, health or nutrition.⁸⁷

National Canteen Guidelines in schools aspire to healthy, equitable, fair and sustainable school lunches but this will remain beyond reach without addressing the economic and social conditions that shape food consumption and continuing to allow industry to help shape policies and strategies.

Recommendations

AFSA recommends the Federal Government:

- Fulfil the obligations of the UN Covenant on Economic, Social and Cultural Rights (1975) to ensure all people have the Right to Food, by implementing recommendations of the World Health Organisation and the UN Special Rapporteur on the Right to Food
- Adhere to human rights based declarations, including the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas ([UNDRIP](#)) & the UN Declaration on the Rights of Indigenous Peoples ([UNDRIP](#)) to address food security and equitable access to food
- Establish a “Food Security Council” in each state that includes all relevant government departments, First Peoples, farmers, food workers and community members with the remit of lowering rates of food insecurity.

- Key areas the Food Security Council could address include requiring local government to create public health plans addressing insecurity⁸⁸. The NSW Public Health Act 2010 does not require local government to create public health plans, unlike Victoria, South Australia and Western Australia, this limits local government’s financial and technical capacity to address this serious social and public health issue⁸⁹. The National Food Security Council could also ensure social service providers, for example services for people experiencing homelessness, are provided with a quality framework, monitoring or training to include food and nutrition in their service provisions⁹⁰.

- Institute broad-based, accessible and direct financial support for individuals and households continuing to be affected by the COVID-19 pandemic in the short- and mid-term, as well as working towards improving social protection for individuals and households experiencing disadvantage resulting in food insecurity in the longer term
- Enable food production and supply aligned with the principles of food sovereignty, for example:
 - Provide financial support and public lands for community gardens, especially in areas designated as ‘food deserts’ or ‘food swamps’

⁸⁷ USDA. United States Department of Agriculture, Food and Nutrition Service. Farm to School Program: Fact sheet: Research Shows Farm to School Works. US Department of Agriculture; 2016 Available from: http://www.fns.usda.gov/sites/default/files/f2s/FactSheet_Research_Shows_F2S_Works.pdf

⁸⁸ Reeve et al. 2020; Rewa, Devine & Godrich 2020

⁸⁹ Reeve et al. 2020; Rewa, Devine & Godrich 2020

⁹⁰ Crawford et al. 2015

- Support social enterprises that provide nutritious and culturally appropriate food to people experiencing food insecurity by subsidising procurement from small-scale food producers
- Enact policies for public procurement of nutritious, culturally appropriate, ethical and ecologically-sound food from small-scale food producers
- Ensure people and communities are engaged to participate in, make decisions about, and control their food systems
- The Federal Government should impose a tax on ultra-processed foods, to reflect the impact on food insecurity, and the likelihood of increased health spending if widespread public consumption of these foods continues
- Develop measures to support regional food sources in the social sector and in schools and hospitals. For example, communal food gardens and orchards should be an integral part of all new residential developments.
- Invest in developing local government place-based solutions that improve access to healthy affordable food for food insecure individuals. Local governments' closeness to their communities gives them a unique ability to lead a place-based approach that involves local food security partnerships and supporting existing community programs⁹¹. Individuals who have experienced food insecurity participation are integral to this process, in order to develop sustainable and socially inclusive programs that support and empower individuals to access healthy foods⁹²
- Provide funding and resources to ensure Aboriginal Community Controlled Organisations (ACCOs) can be effectively engaged in both long-term planning and short-term crisis responses to food and water security
- The Federal Government should establish a campaign to educate consumers on 'best before' dates to reduce food waste.

Improving public awareness of food and nutrition issues

- The Federal Government should ensure that food labelling standards such as the Health Star Rating must not be determined without representation from civil society including smallholders, First Peoples, and low socio-economic demographics who are most impacted by poor health, highly processed foods and food safety regulation.
- The Federal Government should legislate that the availability and format of food and nutrition information should be standardised and government-mandated; rather than as voluntary codes and systems introduced and 'monitored' by the food industry.
- The Federal Government should introduce labelling regarding the environmental impact of foods, drawing on existing examples (e.g. the French government is currently in the process of introducing environmental labelling for all food products).

⁹¹ Crawford et al. 2015; Reeve et al. 2020

⁹² Crawford et al. 2015

- In particular, there is an opportunity to strengthen food education in schools. School-based food education initiatives can play a valuable role in educating children, teachers, and parents about how food is produced and by whom, as well as nutritional information and preparation (see: VCE's implementation of food sovereignty and agroecology in Victoria's school curriculum⁹³). AFSA proposes that:
 - Federal and State Governments should commit stable and sufficient funding for school kitchen garden programs, particularly in low-income areas
 - The Federal Government should strengthen measures to limit junk food advertising, and increase junk food taxation and labelling requirements.
 - FSANZ should work more closely with civil society representatives, particularly low socio-economic demographics and small-scale farmers to understand the impacts of junk food on health and local trade, and improve transparency of Junk Food Labelling
 - The Federal Government should legislate a ban on all types of nutrient, ingredient, and health claims made by businesses producing ultra-processed foods.
 - The Federal Government should require all organisations that receive funding from the Government to restrict all promotion (including sponsorship) related to unhealthy food and beverages as a condition of funding.

Access to key inputs such as fuel, fertiliser and labour, and their impact on production costs

Key inputs to the food system are much more basic than just fuel, fertiliser and labour, they start with healthy biodiversity, soils and water which have been and continue to be impacted in Australia by land clearing, industrial agricultural monocropping, pushing production over ecologically sound land use and promoting high levels of exports, which essentially strip our country of essential nutrients needed for the future of our own food security.

Agricultural Biodiversity

Key Issues

Decline

In 2019 the Food and Agriculture Organisation (FAO) of the UN Commission on Genetic Resources for Food and Agriculture (CGRFA) released the State of the World's Biodiversity for Food and Agriculture report, the first global assessment of biodiversity for food and agriculture (BFA). The report found that 'many key components of biodiversity for food and agriculture at genetic, species, and ecosystem levels are in decline' and that 'evidence suggests that the proportion of livestock breeds at risk of extinction is increasing'⁹⁴. The report also identified a need to research 'the performance of crop-livestock systems, not only in terms of the supply of food and non-food products, but also in terms of the supply of a range of other ecosystem services'⁹⁵.

Industrial Agriculture

Industrial agriculture is a major driver of biodiversity loss⁹⁶. In Australia as elsewhere, the rise of fast-growing, high-yielding industrial genetics has led to a concomitant loss of rare- and heritage-breed livestock. A movement to preserve heritage breed livestock in Australia led by the Rare Breeds Trust of Australia has been gaining traction for at least two decades⁹⁷, but is still nascent and unsupported by

⁹⁴ FAO 2019: xxxviii

⁹⁵ FAO 2019: 448

⁹⁶ IPBES, 2019

⁹⁷ Brown 2018

government policy⁹⁸. There is similarly a notable lack of research in Australia on the importance more broadly of biodiversity in agriculture⁹⁹.

Recent initiatives such as the Australian Farm Biodiversity Certification Scheme Trial funded by the Federal Government Department of Agriculture, Water and Environment¹⁰⁰ demonstrate all too clearly how far Australia has to go in understanding the urgent need for transformation of agriculture, as to date it does not even explicitly include any focus on increasing biodiversity in agricultural produce, only in the landscape surrounding production areas.

Widespread land conversion, habitat loss, excessive pesticide usage, amongst a range of other direct and indirect factors, impact and threaten on- and off-farm biodiversity, with disastrous consequences on ecosystems and human settlements downstream. Industrial agricultural practices diminish soil biodiversity and therefore soil fertility, threatening the future of food and nutritional security.

Agricultural biodiversity is disappearing rapidly as a result. This encompasses a range of essential biodiversity for sustainable food production, including soil biota, pollinators, and genetically diverse seed. Industrial agriculture, forestry, and fisheries systems use homogeneous, proprietary seeds, trees, breeds and aquatic species, scientifically bred and often genetically modified to include limited traits, which are useful to industry. They are grown in simplified agroecosystems that are heavily contaminated with biocides and other agrochemicals.

Biodiversity losses extend across wild and domestic animal species and, as of 2016, '559 of the 6,190 domesticated breeds of mammals used for food and agriculture (over 9%) had become extinct and at least 1,000 more are threatened'¹⁰¹. This poses 'a serious risk to global food security by undermining the resilience of many agricultural systems to threats such as pests, pathogens, and climate change'¹⁰². Meanwhile, the FAO (2019) acknowledges that Indigenous Peoples and peasant smallholders across the globe are the best custodians of biodiversity in food and agriculture, highlighting the urgency of privileging Indigenous and peasant epistemologies and ontologies to preserve the world's remaining biodiversity.

Three out of four of all "new and emerging human infectious diseases" are zoonotic in origin, and a study in the journal *Nature* found that conventional agriculture was associated with half of all the zoonotic pathogens that emerged in humans in that time.¹⁰³ Why this association? Capitalist industrial farming is the most capital- and resource-intensive of any food production systems in the history of agriculture (making for the most energy inefficient kind of farming). It depends on massive volumes of external inputs

⁹⁸ Jonas 2017; Iles 2020

⁹⁹ Walton 2019

¹⁰⁰ NFF 2018

¹⁰¹ IPBES 2019: 12

¹⁰² IPBES 2019: 12

¹⁰³ Whalen, E (2021) 'The Unemployed Epidemiologist Who Predicted the Pandemic'. *The Nation*. <https://www.thenation.com/article/society/rob-wallace-profile/>

and narrow product specialisation to raise profit-making prospects, through economies-of-scale, which also makes for monocultures as the norm.

These characteristics make capitalist industrial agriculture a recipe for biodiversity suppression and erosion, which is also a major contributor to the development of pandemics. Amassing thousands of individuals of the same species in close quarters creates the conditions for pathogens to thrive and potentially mutate to infect other organisms close by, including people. This has been known for decades, just as it has been known that smallholder, low-input farming rarely breeds such potential disasters.¹⁰⁴

Additionally, food systems, climate and biodiversity are intricately intertwined and powerfully speak to links between people, planet, and economy. Payments for environmental services lead to the commodification and financialisation of biodiversity, undermine cultural value systems that support biodiversity conservation and reinforce the disadvantageous economic position of politically and economically marginalised groups like women, Indigenous Peoples and small farmers who often have insecure or otherwise non-recognized land governance rights.

Pollination is one of the most critical and vulnerable ecosystem functions for plant and insect biodiversity and global food security.

Terms such as 'sustainable intensification,' 'efficiency,' 'precision agriculture,' and 'increased productivity' are seen as silver bullets to food and nutrition security. The focus on production and productivity have not, and will not, solve current and future food requirements. The focus of any government reforms should be on reducing the negative impacts of agriculture on biodiversity.

Recommendations

- All levels of government must prioritise Indigenous and other customary tenure rights. Given the critical role of areas governed by First Peoples in conserving biodiversity (cf. IPBES global assessment report), they need to have preference over protected areas and other community-based conservation measures.
- The Convention on Biological Diversity (CBD) COP 5 Decision V/6: defines 'Ecosystem approach', including:
 - The ecosystem approach is a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way. Thus, the application of the ecosystem approach will help to reach a balance of the three objectives of the Convention: conservation; sustainable use; and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources.

¹⁰⁴ Graham JP, JH Leibler, LB Price, JM Otte, DU Pfeiffer, T Tiensin, and EK Silbergeld (2008) The animal-human interface and infectious disease in industrial food animal production: rethinking biosecurity and biocontainment. *Public Health Rep*,123(3):282-99.

- Principle 4: Recognizing potential gains from management, there is usually a need to understand and manage the ecosystem in an economic context. Any such ecosystem-management programme should:
 - Reduce those market distortions that adversely affect biological diversity;
 - Align incentives to promote biodiversity conservation and sustainable use;
 - Internalize costs and benefits in the given ecosystem to the extent feasible.
 - Rationale: The greatest threat to biological diversity lies in its replacement by alternative systems of land use. This often arises through market distortions, which undervalue natural systems and populations and provide perverse incentives and subsidies to favour the conversion of land to less diverse systems.
- Conserve and enhance the sustainable use of biodiversity in agricultural and other managed ecosystems as means to increase their sustainability and social and ecological resilience, as well as the availability of healthy, nutritious and culturally adequate food by:
- Supporting systems that use native seeds, landrace varieties and breeds, as well as agroecological production, particularly those managed by smallholders, increasing the area dedicated to these systems by at least 100%; and
- Decreasing the areas dedicated to genetically uniform production by at least 50%.
- Increase the area of ecosystems and areas managed under ecosystem-based approaches, relevant to the restoration and protection of ecosystem functions, particularly clean water provision and reduction of soil erosion, with full recognition of Indigenous rights to territories.
- There should be no exceptions; ALL incentives harmful to biodiversity need to be identified and eliminated or repurposed by 2030.
- Paying to offset biodiversity losses is not acceptable, biodiversity must be protected by law.
- Any policy or targets that promote 'forests' to protect or promote biodiversity need to focus on 'intact', 'natural' and/or biodiverse forests (including agroforestry following agroecological principles), as monoculture plantations may (temporarily) serve as carbon sinks, but do not address biodiversity loss.
- Planning and Governance only work if rightsholders have ownership and governance rights over their territories and if they get widely supported. This will only be the case if land rights are fully respected and those living in the area can participate in the planning process.
- Restoration of ecosystems should never include destruction and offsetting. Restoration in itself is critical, but its benefits get undone when it is a compensation for destruction elsewhere.
- Conservation in the areas where species naturally live is the most natural and safe way of conservation. Many species need their ecosystems to function well. This is also important for First Peoples and smallholder farmers who develop and conserve agricultural biodiversity and hold in situ seed banks.
- A relatively small number of Highly Hazardous Pesticides (HHPs) cause disproportionate harm to the environment and human health, including severe environmental hazards and acute and chronic toxicity. Phasing out the use of HHPs is necessary and consistent with developments in other international fora addressing chemicals and pesticides, including Target 7 of the Global Biodiversity Framework.

- The Federal Government should introduce legislation to reduce nutrients lost to the environment from excessive use of fertilisers, at least to the minimum required by Target 7 of the Global Biodiversity Framework.
- Promote and reward diversity – of agro-ecosystems and food economies; of farming sizes and systems; of fauna and flora; of diets and cultures
- Improve the monitoring of recognised threats to biodiversity for food and agriculture (monoculture production systems, narrowing of livestock genetic resources, habitat destruction, pollution, inappropriate use of agricultural inputs, overharvesting, pests, diseases and invasive alien species), and strengthen efforts to reduce their negative impacts¹⁰⁵
- Develop financial mechanisms to account for loss of soil, carbon, and water from industrialised food and agricultural systems and build this cost into food prices through taxation
- Recognise the rights of First Peoples in harvesting fish and other traditional foods, and immediately stop penalising them for these activities.
- Reward for sustainable use of native animals and plants for food production, where consent is granted by and benefits of use are shared with the Original Custodians

Soil

Soil is life, and most relevant to this Inquiry is that soil is the primary medium for growing food in Australia.

Including the ecosystem functions provided by soil, Australia's soil provides an estimated value equivalent to roughly \$930 billion per year to the economy¹⁰⁶, based on analysis by McBratney et al. (2017). Through agricultural production alone, soil directly contributes approximately \$63 billion per year to the Australian economy¹⁰⁷.

The 2012 appointment of Australia's first Soil Advocate (the late Sir Michael Jeffery) marked a shift in the federal government's acknowledgement of the importance of healthy soils for healthy agro-ecosystems and food security. Soils for Life supports innovative farmers and land managers who demonstrate 'high performance in regenerative landscape management'.¹⁰⁸

Key issues

Degradation

Since European settlement, human activities have caused or exacerbated degradation processes in Australia's soil, leading to a decline in soil quality and function. A changing climate is bringing more frequent and intense events like drought, bushfires and storms, increasing risks to our soil health. These

¹⁰⁵ FAO, 2019. *State of the World's Biodiversity for Food and Agriculture*

¹⁰⁶ Soil Science Australia 2019

¹⁰⁷ Jackson et al. 2018

¹⁰⁸ <http://www.soilsforlife.org.au/about.html>.

events are increasing soil degradation processes such as loss of carbon, changes in soil biology and soil erosion, causing sediment movement and pollution of our air and water.

Land use conflicts are exacerbating these climatic pressures through both urban expansion into prime agricultural land and increased global food and fibre demands. The rise of new market forces, the cumulative impact of climate change and resource consumption are all also placing pressure on our soil and on effective and sustainable soil management.

Soil formation is a slow and complex process, but degradation can happen swiftly. Soil is essentially a non-renewable resource. It is also the most complex biological material on the planet¹⁰⁹ and one of the most biologically rich and diverse habitats on earth. One teaspoon of soil can contain more living organisms than there are people in the world¹¹⁰.

Soil is the physical, chemical and biological matrix that supports plant growth and provides habitat for a vast number and variety of soil biota. Soil is key to producing our food and fibre. Almost all of what we eat is grown in our soil or fed by what is grown in it. The FAO reports that around 95% of the world's food comes from soil and soil organisms. Carbon cycling in soil is responsible for making available nutrients that support plant growth and help plants withstand biotic stresses. The FAO estimates that increasing the adoption of sustainable soil management practices could increase food production globally by up to 58% (FAO 2015a)¹¹¹.

Carbon Credits

The introduction of carbon credits and more recently, biodiversity credits, also signifies the increasing value governments are placing on soil and biodiversity. Unfortunately, the creation of tradable credits actually serves to lock in forms of economic valuing and rationalising that ultimately undermine the integrity of intact and healthy ecosystems. Carbon mining and destruction can continue in many places only to be purchased as credits from other sources to achieve 'net zero' losses that fail to protect the Australian environment holistically. Many of these carbon credits are also granted to projects where the carbon will be lost, such as in pine plantations harvested within 40 years.

Soil Stewardship

The American state of New Mexico introduced a Healthy Soil Act to support farmers and other land stewards to protect and nourish their land. It established 5 Soil Stewardship Principles:

1. Keep soil covered
2. Minimise soil disturbance and external inputs

¹⁰⁹ Young & Crawford 2004

¹¹⁰ FAO 2020

¹¹¹ Australian Government, Department of Agriculture, Fisheries and Forestry: National Soil Strategy 2021
<https://www.agriculture.gov.au/sites/default/files/documents/national-soil-strategy.pdf>

3. Maximise biodiversity
4. Maintain living roots
5. Integrate animals

These principles align closely with practices in agroecology as discussed earlier. There is an excellent website with many examples of how to implement the principles.¹¹²

Recommendations

- Recognise and support the National Soil Strategy 2021 as a key Federal Government Priority over all else. If we don't look after our soil, we won't have a country to grow food on.
- Introduce a Healthy Soils Act (such as the New Mexico Healthy Soils Act)¹¹³
- Where subsidies are provided to land managers for carbon sequestration, they should not create purchasable or tradeable credits, which disincentivise emissions reduction by polluters.

Water

Key Issues

When we export cotton, rice, beef, wine – any agricultural product – *we are exporting our water.*

We need a return to the fundamental principles of water security and sovereignty. All peoples have a right to clean, safe water – water should be distributed and used equally and on a sustainable basis.

Water should not be privatised, commodified, and sold back to people – we all need water to survive – it is a public good. As with agroecology and regenerative agriculture, which seek to leave the land healthier than we found it, we must regenerate waterways to ensure we have a future where everyone has access to clean, safe, nourishing and delicious food and water.

Naturally

Historically, water has been held in the soil and landscape, which has decreased over time due to the introduction of colonial agriculture systems, including sheep, cattle, and crop monocultures, and a disregard for First Peoples' land management practices.

“Water is precious like a sacred site; we need to be consulted and asked. Our ancestors have been here forever and still are. Working together, better communication.”

Community members from Yeperenye in Northern Territory.¹¹⁴

¹¹² New Mexico Healthy Soils Act <https://www.nmhealthysoil.org/category/soil-health-principles/>

¹¹³ <https://www.nmhealthysoil.org/category/soil-health-principles/>

¹¹⁴ Water Services Association of Australia, *Closing the Water for People and Communities Gap: Improving Water Services to First Nations Remote Communities* November 2022.

Natural sequence farming, developed by Peter Andrews OAM, is based on the principle of reintroducing natural landscape patterns and processes as they would have existed in Australia prior to European settlement. This included:

- Reintroduction of a natural valley flow pattern, reconnecting the stream to its flood plain, which would reintroduce a more natural hydrological and fertility cycle to that landscape, and
- That through a managed succession of the vegetation (mostly weeds initially), the natural fluvial pattern could be 'regrown', so that nutrients and biomass harvested on the flood plain could be redistributed throughout the property and obviously through the stock¹¹⁵

Government Policy

The [National Water Initiative](#) was developed in 2004 and is Australia's blueprint for national water reform. It was agreed by the Australian Government and all states and territories, who have made significant progress in implementing actions under the agreement. The Australian Government is committed to renewing the National Water Initiative to drive continued national water reform and ensure that water issues of national significance have fit for purpose principles and policy to guide management. In addition, the Australian Government has committed to establish a new National Water Commission to drive water reform and future-proof Australia's water resources. The first National Water Commission was established in 2004, before being abolished in 2014. The commission's responsibilities included assessing progress by jurisdictions against the objectives of the National Water Initiative and providing advice to Australian governments on national water issues.¹¹⁶

There is an imbalance of water access licences towards export crops, fodder and fibre, which needs to be rebalanced to ensure greater prioritisation for nutritious and culturally appropriate food sold domestically to nourish Australian communities. Grassroots initiatives such as the Mildura Community Water Bank (MCWB)¹¹⁷ should be promoted and subsidised to ensure equitable access for small-scale agriculture, especially that of vulnerable populations such as refugees and migrant communities.

Natural resources are not capital that should be traded - the current model of trading water access licences on the Murray Darling Basin negatively impacts First Peoples and cultural outcomes, and small-scale food producers. The Murray Darling Basin's capacity to provide water to all its communities is at risk. While the process of formulating the MDBP was long and fraught with governance issues, the four affected states (QLD, NSW, VIC & SA) agreed to implement it in 2012 for the health of the river and its many and diverse communities and uses. However, it appears that lobbying from Big Ag – in particular the cotton industry, which [by its own admission uses a staggering 26% of all Australian agricultural](#)

<https://www.wsaa.asn.au/sites/default/files/publication/download/WSAA%20Preliminary%20report%20-%20Improving%20water%20services%20to%20remote%20First%20Nations%20communities.pdf>

¹¹⁵ <https://www.peterandrewsoam.com/about.html>

¹¹⁶ Australian Government Department of Climate Change, Energy, the Environment and Water: National Water Policy <https://www.dcceew.gov.au/water/policy/policy>

¹¹⁷ <https://www.mcwb.org.au/>

[irrigation water](#) and then exports 99% of their product – resulted in the proposed amendment to take 70GL out of the system further upstream instead of retaining this resource downstream as environmental flows. Withdrawing more water upstream against community sentiment is deeply flawed and a rejection of the tenets of water sovereignty because it's allowing commercial use to quite literally ship our scarce water resources overseas for profit.

Recommendations

- National Water Initiative needs updating the National Water Commission to thoroughly investigate and reform the various water trading platforms to ensure equitable access to all scales of food production.
- Promote and ensure government learns from the efforts of leaders in landscape rehydration (e.g. Peter Andrews and the Mulloon Institute).
- Develop planning legislation, capacity building (led by farmers) and provide financial resources for landholders to work to restore natural flows
- Reform the Murray Darling Water trading scheme so farmers can access and are paying a fair price for water, while eliminating water trading
- Provide a voice for First Peoples in the water services they receive and recognise the cultural importance of water
- Support grassroots initiatives such as the Mildura Community Water Bank (MCWB)¹¹⁸ to ensure equitable access for small-scale agriculture, especially that of vulnerable populations such as refugee and migrant communities

Agri-chemicals

Key issues

AFSA's members overwhelmingly believe that agrichemicals are overused in the Australian environment. Rather than focusing on the production of healthy soils through biodiverse agroecological small-scale farming, the industrial (monocultural) agriculture industry has come to rely on a large range of damaging pesticides, herbicides and fungicides required to 'prop up' enterprises. The effects of this on our ecosystem over many years is at a tipping point.

Undeniable evidence exists that synthetic pesticides pose significant risks to biodiversity and ecosystem services affecting non-target species, ranging from beneficial soil microorganisms, insects, plants, fish, and birds to humans, with an alarming number of deaths and chronic diseases related to pesticide exposure.

'We tax tobacco and alcohol to bring about social change and to provide resources for government policy, but when we ask the mining industry to acknowledge the advantages they enjoy from having

¹¹⁸ <https://www.mcwb.org.au/>

access to the national estate, all hell breaks loose.¹¹⁹ This also relates to the agri-chemical industry and appropriate taxation on chemicals detrimental to the health of our planet.

The effect of Synthetic Chemicals

There are many complex challenges to food production, and the topic of declining pollinating species can be largely traced to the synthetic inputs used in conventional and industrial farming methods along with increasing pollution levels¹²⁰. These have led to declining biodiversity and health of our natural soil, plant and water systems to support healthy levels of species. These also impact the quality of food produced and the ability of our food to maintain good health, shown in increasing health costs across the state.

Disappearing habitats and use of pesticides are driving the loss of pollinator species around the world, posing a threat to ecosystem services that provide food and wellbeing to many millions – particularly in the Global South – as well as billions of dollars in crop productivity¹²¹. The bees, butterflies, wasps, beetles, bats, flies and hummingbirds that distribute pollen, vital for the reproduction of over 75% of food crops and flowering plants -- including coffee, rapeseed and most fruits -- are visibly diminishing the world over, yet little is known of the consequences for human populations.

The contribution to Australia's agricultural output from crops and commodities that are responsive to pollination by insects is significant. The range of insect-pollination-responsive crops includes many that provide high value use of limited resources such as water and soil fertility. Whilst many different insects can affect pollination of one or another of these responsive crops, the European honeybee has for many reasons become the predominant pollination agent of choice in most parts of the world including Australia and producers of responsive crops have come to depend on the services provided by honeybees to achieve economically viable productivity.

More than 8000 pesticide products are formally registered for use in Australia (25% of these being used in households and 75% in agricultural settings). Pesticide use in Australia has been increasing from the early 1990s to-date. Some chemicals are applied on crops when they are growing: others are used to protect produce after it is harvested. Chemicals used for insect control in crops may pose a threat to honeybees located or working in the vicinity of treated crops. The bees can be killed or otherwise adversely affected by many commonly used agricultural chemicals.

The destruction of remnant vegetation through clearing and diseases like dieback also threatens the level of incidental pollination services available from not only feral honeybees but from native bee populations as well. "In a [new report](#) by the current Special Rapporteur on Food, Dr. Hilal Elver, written in collaboration with the Special Rapporteur on Toxics, a clearer account is provided of global pesticide

¹¹⁹ Gammage, B. Pascoe, B. 2021 *Country. Future Fire, Future Farming.*

¹²⁰ <https://www.abc.net.au/news/science/2022-01-20/air-pollution-pollination-flowers-crops/100764594>

¹²¹ FAO, 2019.

use in agriculture and its impact on human rights. The report also canvasses the negative consequences that pesticide practices have had on human health, the environment and society, which are underreported. It also examined how to better protect farm workers, consumers and vulnerable groups, as well as what natural resources are necessary to support sustainable food systems.¹²² The report stated that pesticides kill 200,000 people each year and that pesticides do not increase agriculture yields.”

The new Kunming-Montreal Global Biodiversity Framework agreed by the Parties to the UN Convention on Biological Diversity in December 2022 advocates in Target 7 for a reduction in pesticide use by half by 2030.¹²³

When some Western nations decided that the threat of particular agricultural chemicals was too high to tolerate, they banned their use. Australia is still using many of those chemicals, but there is movement here for us to control the use of such dangerous poisons¹²⁴.

Integrated Pest Management

Integrated Pest Management (IPM) is promoted in Target 7 of the Global Biodiversity Framework. We can move away from the use of pesticides through IPM, which is a generic approach to managing pests, weeds and diseases in a wide range of agricultural and horticultural situations. IPM is intended as an environmentally sensitive approach to pest management that aims to reduce the impact of undesirable organisms to sustainable levels without necessarily eliminating the pest. This enables avoidance of both long term and short term adverse impacts that are often associated with a total reliance on agricultural chemicals targeted at eliminating pest organisms. IPM programs seek to combine the manipulation of multiple aspects of the environment, including natural predator and competitor organisms, with minimal, timely use of chemicals to disadvantage a specific pest organism thereby limiting both its population and its impact on the enterprise in question.

Recommendations

- Federal Government legislation to regulate to reduce the use of pesticides and other Highly Hazardous Chemicals (HHCs) in line with Target 7 of the Global Biodiversity Framework
- ‘Reduce pollution risks and the negative impact of pollution from all sources, by 2030, to levels that are not harmful to biodiversity and ecosystem functions and services, considering cumulative effects, including: reducing excess nutrients lost to the environment by at least half including through more efficient nutrient cycling and use; reducing the overall risk from pesticides and highly hazardous chemicals by at least half including through integrated pest management, based on

¹²² UN Special Rapporteur on human rights and toxics, Pesticides and the Right to Food, 7 March 2017, <http://www.srtoxics.org/2017/03/pesticides-right-food>

¹²³ <https://www.cbd.int/article/cop15-cbd-press-release-final-19dec2022>

¹²⁴ Gammage, B. Pascoe, B. 2021 *Country. Future Fire, Future Farming.*

science, taking into account food security and livelihoods; and also preventing, reducing, and working towards eliminating plastic pollution.¹²⁵

- Develop a national food contaminants register (for genetically modified foods and chemical/ pharmaceutical residues)

Labour and Land Access

Key issues

Ageing Workforce

An ageing workforce in Australia presents significant challenges for the future, with an urgent need to develop a younger workforce across the food and agriculture sector. With the average age of farmers across Australia at 58 (in 2018-19),¹²⁶ the next generation will need to step in to take over various roles across production and distribution of Australia's food and fibre to ensure these industries are able to continue uninterrupted.

Access to Land

Access to agricultural land is a huge barrier to entry for young farmers. Whether looking to farm on small plots in urban and peri-urban areas, smallholdings in regional and rural areas, or engage in large-scale operations, the cost of land makes a career in farming unattainable for most. Land prices are just one hurdle, alongside capital required for infrastructure and equipment, changes to lending and misconceptions about agriculture.¹²⁷ In recent years, there has been a rise in the creation of land-sharing platforms by organisations supporting small-scale food production, such as AFSA's FOOPL (Farming on Other People's Land),¹²⁸ Farmer Incubator¹²⁹, and Young Farmers Connect Farm Links¹³⁰ to make inroads in connecting young people with opportunities to farm.

Labour conditions

Fair working conditions on large farms and in processing facilities is under scrutiny, as agriculture in Australia has a long and continuing history of exploitation and abuse of human rights, beginning with blackbirding, and continuing through inadequate pay and working conditions for Pacific Islander people and backpackers. Workers in the food industry are among some of the most disadvantaged in Australia and their pay and conditions need to be addressed to secure the resilience of the food system.

¹²⁵ <https://www.cbd.int/article/cop15-cbd-press-release-final-19dec2022>

¹²⁶ <https://www.abs.gov.au/statistics/industry/agriculture/agricultural-commodities-australia/2018-19>

¹²⁷ <https://www.abc.net.au/news/rural/2021-02-03/young-farmers-struggle-to-get-foot-in-the-door/13112816>

¹²⁸ <https://afsa.org.au/farming-on-other-peoples-land/>

¹²⁹ <https://www.farmerincubator.org/>

¹³⁰ <https://www.youngfarmersconnect.com/farm-links>

Throughout the COVID-19 pandemic, the crisis has highlighted the current reliance on migrant labour for picking and packing in the agriculture industry. The two main types of foreigners picking fruit in Australia include those on the government's seasonal worker program (typically from Pacific countries) and working holidaymakers (often backpackers) who must complete 88 days of regional farm work to extend their visas for a second year.¹³¹ The industry's pre-pandemic workforce shows of the 65,000 harvesters working around the country in 2019, 52,000 were on working holidaymaker visas, while 8,000 were on the seasonal worker program, and only 5,000 were Australian citizens and permanent residents¹³². As an often undocumented and underpaid workforce, there have been reports that these migrant workers have been misled, indebted and exploited¹³³.

The Covid-19 pandemic has highlighted the unsafe working conditions within the food processing sector, namely meat-processing facilities and abattoirs, as employees require close interaction on processing lines and the work is of rapid nature¹³⁴.

The increasing trend of consolidation of ownership in ever-larger processing facilities has detrimental impacts on livelihoods and communities. As food production industrialises, the people who work within operations become a de-skilled workforce, learning only one task across a complex system, leading to more injuries such as RSI (especially in cold temperature and with vibrating equipment)¹³⁵. Additionally, the shutting down and consolidation of processing facilities, such as abattoirs and mills, has led to a depopulation of rural areas and harvest labour shortages.

This is in contrast to the UN Declaration on Rights Peasants and Other People Working in Rural Areas (UNDROP), which in Article 15.4, states, "peasants and other people working in rural areas have the right to determine their own food and agriculture systems, recognised by many States and regions as the right to food sovereignty. This includes the right to participate in decision-making processes on food and agriculture policy and the right to healthy and adequate food produced through ecologically sound and sustainable methods that respect their cultures."

Local systems with fewer steps between the grower and the consumer often support organic and sustainable farms, which are committed to paying fair wages and are more community-driven and diverse. They also offer transparency – something that extended supply chains are not usually able to provide¹³⁶.

¹³¹<https://www.theguardian.com/australia-news/2020/dec/19/ripe-for-reform-pandemic-crisis-exposes-fault-lines-in-australias-fruit-industry>

¹³² <http://freshproduce.org.au/workforce-shortages/industryemployment/>

¹³³ <https://www.smh.com.au/interactive/2016/fruit-picking-investigation/>

¹³⁴ <https://www.worksafe.vic.gov.au/managing-covid-19-exposure-meat-and-poultry-processing>

¹³⁵ <https://www.repetitive-straininjury.co.uk/factory-workers-develop-rsi/>

¹³⁶ <https://www.bbc.com/future/bespoke/follow-the-food/how-covid-19-is-changing-food-shopping.html>

Recommendations

- Access to agricultural land needs to be reviewed, with viable pathways for individuals and businesses onto arable land, to establish local food systems that prosper. This is linked with our above recommendation about 'Food Lands' with reference to the French model of protecting agricultural land for those who have studied agriculture and purchase it to farm.
- Apply significantly higher taxes on property ownership in regional and rural areas where the dwelling is not the owner's primary residence to discourage the removal of viable agricultural land from production.
- "The UN Declaration on Rights Peasants and Other People Working in Rural Areas, in Article 15.4, states, "peasants and other people working in rural areas have the right to determine their own food and agriculture systems, recognised by many States and regions as the right to food sovereignty. This includes the right to participate in decision-making processes on food and agriculture policy and the right to healthy and adequate food produced through ecologically sound and sustainable methods that respect their cultures."
- Food and agricultural workforce conditions need to uphold human rights declarations including UNDROP
- Ensure the implementation, monitoring and compliance of recent Fair Work changes guaranteeing a minimum wage for all food and agricultural works¹³⁷
- Governments at all levels should support small-scale, community-owned local processing facilities with targeted grants for groups servicing the domestic food economy (rather than the long focus on exports and agri-tourism).

¹³⁷<https://www.theguardian.com/australia-news/2021/nov/04/australian-farm-workers-entitled-to-minimum-wage-in-major-industry-shake-up?fbclid=IwAR14R5-4BXBS38PU2AEKDGwxyPJFRugdFsG4PgUvnpn22I2ViSHp03aXT6eU>

The impact of supply chain distribution on the cost and availability of food

Food waste and destruction

Key Issues

Tackling Australia's Food Waste

According to the most recent report on global food loss and waste from the FAO, we lose or waste about 30% of all the food that is produced globally. AFSA recognises that this is no lesser problem in Australia than it is in other parts of the world.

Food waste, whether it be food that never leaves the farm, food that is lost during transport, or food that is wasted from the hospitality sector and households, has significant economic and environmental impacts. The [National Food Waste Strategy Feasibility Study](#) produced by Food Innovation Australia Limited reported that:

- Food waste costs the economy around \$36.6 billion each year.
- Each year we waste around 7.6 million tonnes of food across the supply and consumption chain – this wastage equals about 312kg per person, equivalent to around one in five bags of groceries or \$2,000 to \$2,500 per household per year.
- Food waste accounts for approximately 3% of Australia's annual greenhouse gas emissions.
- Australia uses around 2600 gigalitres of water to grow food that is wasted – this equates to the volume of water in five Sydney Harbours.
- The amount of land used to grow wasted food covers in excess of 25 million hectares, a landmass larger than the state of Victoria.

Food Loss and Food Waste

When food is lost or wasted, land and water resources are wasted, pollution is created and greenhouse gases (GHG) are emitted to no purpose. To make matters worse, even within a wealthy country like Australia, there are still people unable to gain access to sufficient food.

Food waste is a multidimensional challenge, which means we also need to look for several solutions. We can break it down into **food loss** and **food waste**.

- **Food loss** occurs at the production level and continues throughout the supply chain until it reaches the retail sector.
- **Food waste** is what occurs at the retailer and household level.

This means the solutions required to deal with these problems are different depending on the nature of the issue and where it is occurring.

For producers, being able to ensure that harvest can occur at the right time to ensure that produce is available and ready for market is critical. This means that supply chain inputs such as harvest labour and transport are critical to ensuring that this is not a significant source of food waste. During the COVID pandemic, accessing labour and ensuring that transport is available at the right time have been challenging.

An ongoing issue for producers has been the obligation to supply 'beautiful' produce – that is unblemished, standard size and shape as required by larger retailers. These are not features that impact on the quality, taste and edibility of the produce at all but impact significantly on the unnecessary waste produced and result in producers bearing that cost or receiving significantly less for a product that is not materially different. This issue has, to some degree, been addressed through a variety of 'ugly' fruit and vegetable programs and campaigns, but these tend to be of marginal value as they simply serve to emphasise that this is marginal produce when it is not.

It is also important to educate consumers about food waste and while the efforts of programs such as Love Food Hate Waste are welcome, there is still more that needs to be done to help consumer better understand the need to purchase wisely, store fresh food appropriately and utilise what they have in the fridge and pantry rather than turning to easy alternatives – thereby ensuring perfectly good food is thrown into the bin.

Acknowledging that there will always be some waste in the food system it is also critical that such waste is well managed. Where fresh food simply doesn't sell in a timely way, there needs to be easy access to that produce for food service charities, along with many others. Accessing fresh food for those who are unable to feed themselves is an important role played by these organisations – which rely on accessing the excess produce that is not used by others - but this is not systemic change, rather food relief is simply the least-bad way to compensate for a fundamentally flawed food and agriculture system that leaves some hungry when there is enough food to go around.

Food waste that is beyond use should not end up in landfill and ensuring that there are appropriate facilities to transform that waste into other products such as compost, digestate or energy is the key to ensuring that food and the minimal food waste that comes from it is included in developing a circular economy. This means understanding where such facilities are best located in order to take best advantage of the food waste resource while at the same time meeting community expectations and environmental health standards.

Love Food Communities

The 2 year NSW trial launched in 2019 to reduce food waste through the Love Food Communities program¹³⁸ is a step in the right direction. The projects are an important part of the Federal Government's commitment to halve food waste by 2030:

- Participants will need to complete a survey to understand how much food they are throwing out so that they can change their food practices and learn how to better store food and reuse leftovers.

Recommendations

- Support innovative models for distribution and supply of food to shorten and decentralise supply chains, and reconnect producers and consumers (E.g. community-supported agriculture, food hubs, farmers markets, on-farm sales and farmgate stalls)
- Remove aesthetic food standards from contracts between producers and retailers
- Enact legislation to prohibit the disposal of food and organic matter in landfill by the end of 2023
- Financially support the development of community-led and local circular economies e.g. community composting, FOGO collections in all local-government areas
- Invest in consumer education e.g. food storage, best before vs use by dates, seasonality to reduce food waste
- Expand the Love Food Communities program

Corporate Domination and Fair Trade

Key Issues

Australia's food and grocery manufacturing sector is under pressure from declining profitability due to a highly concentrated retail marketplace, resulting in decades of stagnant capital investment and low innovation

Concentration of Power in the Food System

All aspects of the food value chain – seeds, agrichemicals, processing, retail and production – are highly concentrated in a few corporations. Coles and Woolworths control around 60 per cent of fresh food and grocery sales. Kirin controls around 80 per cent of Australia's drinking milk. And Weston Foods and Goodman Fielder control around 70-75 per cent of the bread and bakery markets. Further, processing facilities (such as abattoirs, canneries and grain mills), and the majority of genetic resources (such as seed and livestock) are increasingly concentrated among few powerful companies, often multinational. A food system that depends on a few corporate interests creates perverse outcomes, particularly the

¹³⁸ <https://www.nsw.gov.au/news/program-to-reduce-food-waste-nsw>

squeezing of producers and processors' margins. It forces them to prioritise efficiency and output at the expense of healthy and environmentally sustainable practices.¹³⁹

Distribution

Australia's highly concentrated 'duopoly' distribution model strongly disadvantages producers, especially small-scale farmers, as powerful retailers are able to unilaterally set the terms of contracts and increase their own profit margins at the expense of suppliers. Furthermore, this model also leads to increased food waste, weak and inflexible long supply chains, and an alienated food culture where most consumers are disconnected from their food and its producers.

Supply chain resilience and redundancy is not systemically built into the food supply chain. Australia's food supply chain is exposed to disruption from increasing extreme weather events – particularly more frequent and intense droughts, fires and floods – and malicious attacks. Although Australia is a net exporter of food, Australia is not fully self-sufficient in food supply. Imported food represents about 16 per cent of household consumption, including highly processed fruit and vegetables, coffee, pasta and rice. Our food production also relies on aspects of global supply networks for inputs, such as energy, labour and agricultural supplies. The domestic food supply chain is vulnerable because of just-in time processes over long physical distances across a diverse range of producers, processors, manufacturers and retailers. Further, lack of public awareness about the risks to their food supply leaves them unprepared for potential disruptions. These pressures will grow as climate change causes a forecasted decline of 15-30 per cent in domestic food production over the next 40 years¹⁴⁰

The ACCC notes that power in a bargaining relationship (i.e. between the farmer selling their produce and the retailer buying it) is determined by the number of alternative options that each party has.¹⁴¹ In the case of a supermarket duopoly, farmers have very few alternative options to sell their produce, and retailers are thereby able to impose their own terms of price and standards.¹⁴² This is not solely a question of paying low wholesale prices and increasing profit margins at the retail level. The two major supermarkets have also engaged in more aggressive tactics, such as requiring suppliers to pay 'slotting fees' to rent out premium supermarket shelf space,¹⁴³ forcing suppliers to absorb the cost of unsold products,¹⁴⁴ and requesting 'voluntary' contributions to help pay for supermarket promotional

¹³⁹ Commission for the Human Future | Policy Report: The Need for strategic food policy in Australia. Governing for a healthy, sustainable, economically viable and resilient food system 2021 <https://www.humanfuture.net/wp-content/uploads/2021/02/The-Need-for-Strategic-Food-Policy-in-Australia.pdf>

¹⁴⁰ Commission for the Human Future | Policy Report: The Need for strategic food policy in Australia. Governing for a healthy, sustainable, economically viable and resilient food system 2021 <https://www.humanfuture.net/wp-content/uploads/2021/02/The-Need-for-Strategic-Food-Policy-in-Australia.pdf>

¹⁴¹ <https://www.accc.gov.au/system/files/Grocery%20inquiry%20report%20-%20July%202008.pdf>

¹⁴² Richards, Carol, Hilde Bjørkhaug, Geoffrey Lawrence, and Emmy Hickman. 2013. 'Retailer-driven agricultural restructuring—Australia, the UK and Norway in comparison', *Agriculture and Human Values*, 30: 235-45.

¹⁴³ Edwards, Lindy. 2020. *Corporate Power in Australia: Do the 1% Rule?* Melbourne: Monash University Publishing

¹⁴⁴ Ibid

campaigns.^{145]} For small-scale producers in particular, the pressure on already-slim profit margins threatens the viability of their operations. Although the grocery code of conduct introduced in 2013 restricts some tactics of supply chain squeeze, it is purely voluntary, and large retailers' market power may allow them to sidestep it entirely. Across the Tasman, the New Zealand government is considering breaking up the duopoly of Woolworths and Foodstuffs, in response to a study by the Commerce Commission which found that the current model is not working well for either suppliers or consumers.¹⁴⁶

The supermarket duopoly also leads to significant food wastage at the production stage. While both Coles and Woolworths have aligned with food charities in corporate social responsibility initiatives to redirect unsold or 'surplus' food, research has revealed a number of contradictions in this arrangement.¹⁴⁷ Most notably, a large volume of perfectly edible produce does not even reach the shelves (i.e. has no opportunity to be redirected to charity) due to supermarket aesthetic standards and production volumes. No transparent data on this phenomenon of 'upstream' food waste exist in Australia, but US research estimates that when this waste stream is added to retail and consumer waste, about half of all produce grown is thrown away.¹⁴⁸ The power of large supermarkets to shift risk – and associated wastage – onto producers is a key part of this problem. For example, a Tasmanian lettuce grower contracted to Woolworths had to plant crops to fill the supermarket's largest possible supply order, but would usually bulldoze most of it back into the ground:

"I have to grow for the maximum size of an order, or else I lose the contract. So I grow on that scale even though the order is usually a lot less. Everything I don't sell, I have to destroy."¹⁴⁹

The demands of large retailers thereby impose false and unsustainable economies of scale, where farmers are forced to overproduce and huge volumes of perfectly edible, nutritious food is wasted. This is apparently to ensure that supermarket shelves are never empty. However, the COVID-19 pandemic clearly demonstrated that distribution models relying on long supply chains are the most vulnerable when crisis hits. Supply chain interruptions and panic buying showed up the weaknesses in the 'just in time' model, with supermarket shelves empty of many basic products such as eggs, pasta, and meat. Meanwhile, many farmers faced the sudden closure of their usual market channels, as the operations of some farmers' markets and food services businesses ceased.

For large-scale farms, this spelled disaster. For example, a watermelon grower in the Northern Territory whose market was primarily restaurants, caterers, and airlines had very little choice but to watch the melons rot in the fields. With 600 tonnes versus a pallet of produce to sell, selling direct to eaters was not an option. However, small-scale farmers had significantly greater capacity to pivot to direct sales. Entities such as [Open Food Network](#) rose to the challenge to bring a thrilling wave of new farmers onto

¹⁴⁵ <https://www.themonthly.com.au/issue/2014/august/1406815200/malcolm-knox/supermarket-monsters#mtr>

¹⁴⁶ https://comcom.govt.nz/__data/assets/pdf_file/0025/278404/Market-study-into-the-retail-grocery-sector-Summary-of-findings-8-March-2022.pdf

¹⁴⁷ <https://www.qut.edu.au/study/business/insights/powerful-supermarkets-push-the-cost-of-food-waste-onto-suppliers-charities>

¹⁴⁸ <https://www.theguardian.com/environment/2016/jul/13/us-food-waste-ugly-fruit-vegetables-perfect>

¹⁴⁹ <https://www.themonthly.com.au/issue/2014/august/1406815200/malcolm-knox/supermarket-monsters#mtr>

their platform to directly connect with eaters looking for alternatives to the supermarkets. The upsurge in people seeking direct sales from farmers was breathtaking. For example, one beef producer saw an 85 to 100% increase in direct orders during the first month of the pandemic, which allowed them to cover their costs in the absence of restaurant sales and on-farm tourism operations.¹⁵⁰ Another organic producer went from delivering 300 produce boxes per week to 800, while others reported an initial spike in interest which steadied out to around 30% growth over time.¹⁵¹ Although there were some adaptation challenges involved – for example, developing systems to support the massive increase in demand – small-scale producers were able to succeed in providing food where long supply chains failed. The pandemic demonstrated that globalised food systems are brittle and threatened, while local food systems, solidarity economies, and strongly networked and collectivised communities are strong.

Alternative distribution models, based in localised networks and drawing on close relationships between producers and consumers, present farmers with the option of greater financial security, risk sharing, and deeper connection with the people who eat their produce. Given the grassroots nature of these models, good policy in this area relies less on intervention and more on enabling scale appropriate regulation that supports small-scale farmers.

Alternative distribution models¹⁵²

CSA (Community Supported Agriculture) model	Members buy shares in an individual farm’s projected harvest in advance and for a set period (a year, for example) and receive regular deliveries. Members share in both the risks and benefits of the farm, but by mitigating risk through good farming practices and crop diversity, members will almost always have a full box.
Multi-farm cooperative model	A group of farmers get together to market, plan, harvest, pack, and distribute a produce box. Solidarity economy is similar to the traditional CSA, in that members subscribe for a set period of time and share in both risks and bounty. Farmers have less administrative and marketing overhead and can specialise in a smaller number of crops, while consumers are provided with a more diverse box.
Food hub model	A food hub sources and aggregates produce from multiple local farms, including a produce box as well as additional items such as meat, honey, grains, bread, eggs, etc. The food hub is a dedicated distributor (unlike the multi-farm cooperative model outlined above) but lower

¹⁵⁰ <https://www.abc.net.au/news/2020-04-05/farmers-rising-food-sales-gate-coronavirus/12119368>

¹⁵¹ <https://www.abc.net.au/news/2020-05-24/fruit-and-vegetable-consortium-launched-in-australia/12262468>

¹⁵² Partially adapted from Smith, D.; Wang, W.; Chase, L.; Estrin, H.; Van Soelen Kim, J. Perspectives from the Field: Adaptions in CSA Models in Response to Changing Times in the U.S. *Sustainability* 2019, 11, 3115. <https://doi.org/10.3390/su11113115>

	'middleman' costs associated with transportation, marketing, administration, and packaging allow it to pay a fairer price to farmers. Members can subscribe for a set period or order individual boxes on a one-off basis.
Food co-ops and bulk buyers' groups	Consumers organise themselves in networks to buy and distribute food from local producers. There is typically a co-op membership fee, but the ability to buy in bulk means that members can pay lower wholesale prices. Food co-ops may develop direct relationships with producers and/or purchase through a food hub.
Direct or farm-gate sales	Individual farms offer a selection of products available for direct purchase, usually through an online store. This might include a produce box scheme where consumers can purchase a one-off box or choose the items in their box (rather than subscribing for a set period of regular box deliveries).
Farmers' market	Multi-stall markets where farmers can sell produce directly to consumers, usually on a regular basis. No middleman means lower prices, and farmers' markets also offer the opportunity for direct contact and connection between producers and eaters. During COVID-19, some farmers' markets switched to online sales, whereby vendors listed items online (e.g. in a local Facebook group) and consumers paid and arranged pickup at a dedicated point.

When speaking of climate change mitigation, decentralised, localised food systems have lower environmental footprints and greater resilience. Place-based solutions are local solutions. They solve problems in the places where they occur – hopefully before they occur. By shortening supply chains, we reduce emissions and increase resilience in the face of climate change and the rise of pandemics. A growing number of collectivised farmers are onto this – they are building infrastructure and taking control back into community hands – but there are several policy barriers to this work to re-localise food and agriculture systems.

Support for a resilient food system

We emphasise the need for localised support for food production industries such as abattoirs, grain mills, and on-farm and cooperative-managed dairy and meat processing facilities. While securing small-scale, low stock density farming, state planning regulations should also support mobile infrastructures, which in turn will improve direct sales of produce to communities (e.g. via Community-Supported Agriculture and farmers' markets). The lack of access to abattoirs impacts not just animal welfare, but also prohibits new farming ventures from getting started in the first place. Large industrial abattoirs with a focus on export are increasingly moving away from accepting small private kills. Where farmers lose

opportunities to process and distribute their produce, it becomes increasingly difficult to provide local food to rural and regional communities. In the more remote parts of Australia where many livestock are grown, mobile abattoirs offer a feasible alternative to process livestock without prohibitive distance and cost to producers.

Recent experiences from our members during times of flood, fire and drought also bring to light the lack of recognition and support provided to these smaller scale producers whereby they are ineligible to claim for the same 'relief' packages due to government and agency definitions of 'farms'. There needs to be recognition that these smaller scale farms play an important and justifiable role in our food system.

Supermarkets and Big Dairy

"Australia has by far the most concentrated supermarket sector in the developed world. Today, far from the rhetoric of 'free' and 'competitive' markets, the food economy is governed by an oligopoly of private interests."

Author and academic Raj Patel uses the metaphor of an hourglass to describe the globalised food system, with a large number of farmers at the top, and a huge number of eaters at the bottom, but most of the value in the system being squeezed and syphoned off by a tiny number of corporate actors in the middle¹⁵³. Since deregulation of the dairy industry, the multinational food and beverage company, Kirin, now controls around 80% of Australia's drinking milk market, forcing out farmer-run cooperatives like Dairy Farmers¹⁵⁴. Two companies, Weston Foods and Goodman Fielder, control more than half of the flour milling, bread and bakery markets¹⁵⁵.

"As suppliers to companies like Kirin in the milk market, farmers are forced to accept lower and lower prices in order to win supply contracts. In the milk sector, farmers have seen dropping farm gate prices since deregulation in the early 2000s."

Supermarkets - "anti-competitive policies and practices that depend on enormous market power, including: anti-competitive price discrimination, shopper docket schemes, 'store saturation' strategies and over-sized store strategies. These practices assist the growth of the dominant players by unfairly handicapping smaller independent competitors."¹⁵⁶

¹⁵³ Patel, R., 2007, "Stuffed and Starved: Markets, Power, and the Hidden Battle for the Global Food System". Black Inc

¹⁵⁴ Durie, J. "Big supermarkets gain fresh food market share at the expense of the small guys" The Australian, 9 March 2011 <http://www.theaustralian.com.au/business/opinion/big-supermarkets-gain-fresh-food-market-share-at-the-expense-of-the-small-guys/story-e6frg9if-1226018006708>

¹⁵⁵ "Foreign takeovers continue" The Weekly Times, 7 March 2012 http://www.weeklytimesnow.com.au/article/2012/03/07/452681_business-news.html [accessed 6 July 2012]

¹⁵⁶ Let's Have Fair Competition! The risk of losing retail diversity, choice and true competition in Australia's supermarket industry, Master Grocers Australia, available at: http://www.mga.asn.au/index.php/download_file/view/1294/1/.

Big Meat

One Brazilian company controls so much of the global meat market it can openly admit to having bribed more than 1,900 politicians and continue to grow in spite of endless scandals. Its name is JBS, and it has an annual revenue of AUD\$70 billion, slaughters some 13 million animals per day, and it has been on an acquisition spree since its owners were let out of jail, including a purchase of the world's third largest alternative protein company Vivera earlier this year. Just weeks ago, JBS got the green light to takeover Huon Aquaculture, Australia's second largest salmon producer.

In June 2021, JBS won a bid to take over Rivalea, which owns two abattoirs in southeastern Australia. The acquisition gave JBS control of more than a third of pig kills in Australia.

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.

The JBS takeover highlights an urgent need for policies which support diversification of the meat processing sector and support for smaller producers. Supporting a mix of small-scale local abattoirs would dramatically increase the resilience of local economies, especially in the face of crises like the COVID-19 pandemic.

Free Trade vs Fair Trade

The free trade agenda may have been relevant in an era of cheap fossil-fuel driven, globalisation; but this era is coming to an end as these forms of energy become depleted. Just as the new economy of the future will be increasingly powered by renewable energy sources, so too the engines of economic development will need to become increasingly regionalised and localised.

Food sovereignty doesn't mean the abandonment of trade and the pursuit of total food self-sufficiency. Enjoying the foods from other countries and cultures is one of life's pleasures, and can make ecological sense where production is regionally specialised and distribution is environmentally sustainable. But trade should be conducted on the basis of some fundamental principles that genuinely work to the universal benefit: solidarity, transparency, respect for human rights, and ecosystem integrity. Trade, in other words, that is fair to soil, water, air, plants, animals, farmers and eaters everywhere. That Free Trade Agreements (FTAs) work to the benefit of most farmers is a myth promoted by governments and big corporate agri-business. Consumers may, in the short term, enjoy the benefits of cheaper food imports, but this is at the cost of long-term food sovereignty.

Recommendations

- Tackle the corporate control of the food system: prohibit concentration of ownership to no more than 5% of any sector

- Establish a supermarket ombudsman with strong enforcement powers as a first step to tackling the abuse of market power by the supermarket duopoly against suppliers and shoppers
- Carry out an independent, comprehensive national review of competition law and policy to address duopoly and oligopoly power across the food system
- Recognise small scale farmers as ‘farms’ to ensure they obtain the same level of support as others.

Research and monitoring to understand the state and extent of the sector.

- Federal and State Governments should undertake research on alternative distribution models (e.g. CSAs, farmers’ markets, direct sales) to understand how government processes such as scale-appropriate regulation can be amended to support scaling out; the social benefits of alternative distribution models including cohesion and food literacy; and public health benefits through improved access to fresh food.
- The Federal Government should undertake research on food distribution models during the COVID-19 pandemic, to ascertain how CSAs, farmers markets and other alternative models remained largely unaffected by long chain supply disruption. Research findings should be used to develop policy and regulations that support localised food systems being the strongest pathway to domestic food security.

Platforms for knowledge-sharing and public awareness of alternative distribution models

- The Federal Government, in collaboration with state and local governments, should develop a searchable database of alternative distribution models for farmers and eaters looking to be matched to programs, including logistics for network contacts
- Drawing on the expertise of existing participants and organisers, a series of official ‘how-to’ guides should be developed to assist in the development of alternative distribution models.
- Local governments should establish partnerships with alternative distribution models (e.g. CSAs, food hubs, or multi-farm models) to improve public awareness and put a face to local food production. This could include promotion on local government social media, websites, and in newsletters, an informational brochure to be distributed via relevant council offices, as well as the previously mentioned database and how-to guides.
- Remove export growth from government objectives, these objectives should relate to the growth of agroecological farming systems and improvements in our soil, water, air and domestic food security
- Develop grants for on-farm and cooperatively owned processing infrastructure such as abattoirs, dairy processing, grain mills, and more (e.g. Artisanal Agriculture grants in Victoria)
- In the development of grant opportunities in food and agriculture, remove export requirements for funding eligibility
- Conduct an independent review of all FTAs, and of all their impacts – social, environmental and economic - is long overdue, and the Australian people should have the opportunity to debate its findings and recommendations
- Develop policy options in conjunction with the Australian Fair Trade and Investment Network (AFTINET) - a national network of community organisations and many individuals concerned about trade and investment policy

Quality control and labelling of processed / manufactured food

Key issues

Nutritional claims

A clear and strong message from national forums conducted by AFSA over more than a decade is that those who produce and promote unhealthy food must have their freedom to act curtailed in the interests of society as a whole. Similar to tobacco regulation, the food industry could and should be subject to a range of legislative and regulatory approaches aimed at reducing the intake of foods of low or non-existent nutritional or health benefit. Proper regulation of the marketing activities of the industry will save the country tens of billions in healthcare costs over the coming decades. It will also help prevent millions of Australians from having to cope with the pain and suffering of diabetes and other obesity-related diseases.

While the issues are complex, regulatory approaches such as restriction of junk food advertising, stronger food labelling laws and taxes on unhealthy foods have to be part of our national conversation around healthy eating.¹⁵⁷

One issue is that most of the regulation of food labelling (on nutrition) takes place at a federal level through FSANZ and associated governance bodies. There is scope for state governments to influence the FSANZ Code (containing standards on nutrition labelling) through their membership of the Australia and New Zealand Ministerial Forum on Food Regulation, so they can advocate through that to implement additional regulation regarding things like added sugar labelling.

Unlike drug corporations, food manufacturers do not need to make explicit health or disease prevention claims on their food labels to communicate health benefits to consumers. Food companies can instead rely on simple nutrient and ingredient claims on their products —such as “high” in protein, fibre, omega 3 fats, or antioxidants—which then function as implied health claims. These claims are intended to produce what we may call “imagined health benefits,” whereby consumers form a link between particular food components and their health benefits. One of the aims of nutritional marketing is to populate the imaginations of consumers so as to create nutritional halos around commercial products. Importantly, food labelling regulations in most countries facilitate and are complicit with these implied health claims by permitting the use of nutrient content claims on most ultra-processed food.¹⁵⁸

¹⁵⁷ Australian Food Sovereignty Alliance : The People’s Food Plan — working paper, February 2013

¹⁵⁸ Gyorgy Scrinis, Ultra-processed foods and the corporate capture of nutrition—an essay, 2020
<https://www.bmj.com/content/bmj/371/bmj.m4601.full.pdf>

Regulations

There are two sides to the regulatory burden, in that current quality control and labelling regulations are onerous and inhibit the growth of small scale food businesses - who are often the producer, processor, distributor and retailer.

Whilst there exists some national voluntary production labelling such as organic, fair trade, or ethical production, this system needs to be turned on its head. The regulations should cover declaration where products have had synthetic inputs, GMO or are farmed in feedlot conditions, rather than putting the onus on producers to prove otherwise. A review of regulatory and labelling requirements for processed food should be expanded beyond allergens and food contents, to include chemicals, additives used during production.

Various strategies have been proposed or implemented, typically calling for greater transparency and independence of scientists, research funding, scholarly publications, and expert committees. They include proper disclosure of conflicts of interest in journal publications and for decision making committees; the refusal of industry funding and sponsorships by university scientists and professional associations; and the exclusion of industry funded studies from dietary guideline reviews. Given the central role of labelling and marketing in corporate scientific strategies, recent government initiatives on food labelling and marketing in countries such as Chile and Mexico could go further still, disallowing all types of nutrient, ingredient, and health claims and restricting the marketing and availability of all ultra-processed products.¹⁵⁹

Recommendations

Eaters should have as much information about their food systems as possible, and everything we need to make fully informed decisions and choices; this applies especially to the need for comprehensive labelling. AFSA recommends:

- Independently funded research into dietary guidelines and the exclusion of industry funded studies from dietary guideline reviews
- Strengthening of Junk Food advertising, taxation and labelling requirements
- Work with communities and FSANZ to improve transparency of Junk Food Labelling
- Disallow all types of nutrient, ingredient, and health claims and restricting the marketing and availability of all ultra-processed products
- Require all organisations that receive funding from the Federal Government to restrict all promotion (including sponsorship) related to unhealthy food and beverages as a condition of funding
- Labelling regulations should focus on additives/chemical/GMO inputs throughout the chain - so that consumers can easily identify what chemicals have been used in manufacture

¹⁵⁹ Gyorgy Scrinis, Ultra-processed foods and the corporate capture of nutrition—an essay, 2020

- More comprehensive Place of Origin Food Labelling (extending to seafood, and Country)
- Education on 'best before' dates to reduce food waste.

The potential opportunities and threats of climate change on food production in Australia

Managing the impact of climate change

Key issues

Climate Change

The Australian Government has introduced the [Climate Change Bill 2022](#). The Bill legislates the nation's commitment to reduce greenhouse gas emissions by 43% below 2005 levels by 2030, and net zero by 2050.¹⁶⁰

The focus on scale, intensification, and export has contributed to climate change, the rise of pandemics of zoonotic diseases such as avian and porcine flus, and plagues of insects and rodents. The intensive production of a constantly narrowing range of species and breeds of animals and plants common in uniformity-loving capitalist agriculture is leading to greater risks in our food system. In the case of the rise of zoonoses like coronavirus, one of the most significant risks is from intensive livestock production.

Transformation

There are growing calls from across the political spectrum to transform the current food system in response to climate change. Since Britain's colonisation of Australia in the late eighteenth century, settler values of productivity and improvement have transformed Aboriginal and Torres Strait Islander Country into a landscape devastated by agricultural and mineral extraction. Industrial farming practices have led to deforestation, soil erosion and degradation, biodiversity loss, flooding, increased salinity, degraded water catchments, and poor river health, which has in turn caused the death of millions of fish, and the loss of access to potable water for some rural communities. The policies of recent decades favour competition and export, and have enabled large-scale corporate agribusinesses to thrive at the expense of family farms, rural communities, animal welfare, and the environment. Both a cause and a victim of climate change, industrial agriculture was a major contributor to Australia's unprecedented

¹⁶⁰ Australian Government Department of Climate Change, Energy, the Environment and Water: Climate Change Bill 2022 <https://www.dcceew.gov.au/about/news/climate-change-bill-2022#:~:text=The%20Australian%20Government%20has%20introduced,and%20net%20zero%20by%202050.>

heatwaves and bushfires in early 2020, which incinerated 12.6 million hectares and over a billion animals.¹⁶¹

Farming both contributes to and is endangered by the biggest existential threats of our time: climate change, water shortages, soil loss, energy production, natural disasters, zoonotic diseases, population displacement and geopolitical trade wars. That means we need governments to get the policy settings right. Yet no Australian political party is doing serious thinking about how to knit together food, farming and environmental policies to continue feeding the population whilst mitigating climate change and biodiversity loss.¹⁶²

With the challenges of farming a dry and arid land with fragile soils, Australian farmers have often been at the forefront of innovative farming practices. Many farmers have the local knowledge necessary to care for Country while earning a fair livelihood, and they already act as stewards for future generations. At the same time, changing global, political and economic conditions have locked many farmers into a 'treadmill of production' requiring ever-increasing agricultural inputs such as chemical pesticides and fertilisers even as prices paid to farmers decline.

Farmers wanting to diversify and become more sustainable, both environmentally and financially, are faced with numerous obstacles and regulatory burdens, as this comment from AFSA's research makes clear:

Every additional enterprise we would like to add to our farm brings with it another layer of paperwork and compliance cost. Fruit and veg are the only part not affected. If you want cattle, laying hens, pigs, dairy, or heaven forbid do your own processing, each incur another layer of paperwork and cost. Incidentally, the total cost for a small operation is essentially the same as for a large corporate, which makes it very difficult for small operators to compete. (written submission, Organic Farmer, Queensland)

Agroecology

An alternative to industrial agriculture, agroecological farming is the application of ecology to the design and management of sustainable agroecosystems. Agroecological farmers favour long-term strategies that are flexible and can be adjusted and re-evaluated over time. They aim to diversify production on farm, which creates resilience ecologically, and for farmers and eaters in the face of climate change, but also for shifting market prices. At the core of agroecology is the idea that the type of farming undertaken must be appropriate for that particular environment.

This farming philosophy has been gaining an increasing following globally as farmers are seeking out more sustainable farming methods. The concept is endorsed and promoted by the Food & Agriculture

¹⁶¹ (Werner and Lyons 2020)

¹⁶² Chan, Gabrielle. 2021. Why you should give a f*ck about farming

Organisation of the UN (FAO)¹⁶³ as a means to feed growing populations sustainably. 400 of the world's leading agricultural scientists, and the UN Special Rapporteur on the Right to Food have identified agroecology as an important way forward for global agriculture.

Agroecology does not propose a 'one-size fits all' approach or model, but rather requires site-specific understandings of particular farms and bio-regions in order to assess whether or not particular technologies or inputs are or are not appropriate, given the goals of farm productivity and resource conservation.

Many Australian farmers are already implementing agroecological principles and practices, which include:

- Maintenance of water, nutrient, carbon and energy flows within the farm;
- Integration of crops and livestock;
- Diversification of crops and livestock species; and
- A focus on interactions and productivity throughout the agricultural system, rather than a focus on individual species.

Millions of farmers and Indigenous Peoples around the world are already producing food in ways that build on the principles of agroecology. In an enabling policy context, agroecology has proven to achieve robust gains across a range of benefits including biodiversity and climate resilience. A growing number of agencies, research institutions, governments, and donors are adopting policies and developing tools to scale up and scale out agroecology.

That said, agroecology as a term is still relatively unfamiliar in the Australian context¹⁶⁴, and its potential needs to be promoted and embraced. In December 2022, agroecology was embraced in Target 10 of the Kunming-Montreal Global Biodiversity Framework ratified by the Parties of the Convention on Biological Diversity, to which Australia is a signatory.

A major criteria of any reform should not be reduced to current productivity and capability of soils, but focused on the potential for farming systems that sequester carbon dioxide as a way to stabilise soil carbon. Regenerative practices, as advocated by the likes of AFSA, Young Farmers Connect, Open Food Network, Charles Massy (farmer and author of *Call of the Reed Warbler*), and Paul Hawken (author of *Drawdown*) amongst many others, can make a significant contribution to climate change solutions while improving agricultural productivity.

Industry Support

For financial support to be effective in supporting agroecology, a large portion of it needs to be comprised of small to mid-scale grants through food producer organisations and civil society

¹⁶³ <https://www.fao.org/agroecology/home/en/>

¹⁶⁴ For a greater understanding of how agroecology differs from regenerative agriculture, see AFSA's post: <https://afsa.org.au/blog/2021/06/28/13699/>

organisations who are close to the ground. Agroecology explicitly enhances bottom-up processes of development and food system transformation based on the needs, knowledge, priorities and agency of people and nature, rooted in territories. Funding for agroecology should be underpinned by a principle of co-governance where donors are accountable to the most affected.

In Australia, federal government policy over several decades means that public investment in agricultural research and development is declining. Funding for state agricultural departments, the CSIRO and universities is decreasing, forcing those institutions to partner up with private companies, which means that research is biased towards technologies that have the potential to generate profits for agri-business corporations. Government-funded extension services, which support farmers to innovate and adapt, have been dismantled. If Australia is to make a wholesale shift toward a low carbon, sustainable farming future, and within the current and future resource limits (water, oil, arable land) new methods are required. Investment in researching sustainable food production methods is urgent; and extension services need to be reinstated to pass on new innovations to farmers and to support the farming community to adapt to changing conditions.

Recommendations

- Promote and support Indigenous land management, including fire management, to restore biodiversity and health of Country
- Measure quality of agricultural systems on landscape function, provision of ecosystem services including carbon sequestration and landscape rehydration, and protection and promotion of biodiversity at the genetic, species, and ecosystem levels
- Support innovation through research and development, and horizontal knowledge sharing to develop and share new models, ideas and designs:
 - Agroecological farming systems
 - First Peoples-to-farmer knowledge sharing
 - Farmer-to-farmer knowledge sharing
- Promote and finance research into agroecological food production and co-design and co-produce educational resources in partnership with small-scale farmers
- Support a risk- and scale-appropriate regulatory framework to enable small-scale and agroecological production
- Ensure industrialised food and fibre production is appropriately regulated due to the environmental impacts of monoculture production, land clearing and the use of veterinary and agri-chemicals