



AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE

Australian Food Sovereignty Alliance

Submission to the Victoria Climate Change Strategy 2026-2030

*Victoria State Government
Department of Energy, Environment and Climate Action*

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Prepared by:
Jessica Power
AFSA General Coordinator

We thank the Victorian Government for initiating an inquiry into securing the Victorian food supply. AFSA welcomes the opportunity to provide a written submission, as well as all further opportunities to participate in development and implementation of policies to strengthen Victoria's food security. We hope the Government 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 within our food system.

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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 agroecology-oriented 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 and distributed in socially-just, ethical and ecologically-sound ways is increasingly in demand.

Governments must facilitate and encourage the emergence and viability of agroecology 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, and just relations between settlers and First Peoples.

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 Association, Friends of the Earth, Fair Food Brisbane, Young Farmers Connect and the Permaculture Network, as well as academics from the University of Melbourne, RMIT, Deakin University, University of Tasmania, University of Sydney, SCU, QUT, UQ and UWA.

Executive summary

Context

Climate change is the largest existential threat to all living beings on Earth, and is unequivocally linked to the increasing greenhouse gas (GHG) emissions from burning fossil fuels since the rise of capitalism sparked the industrial revolution. At an international level, the UN Paris Agreement in 2015 gained the support of governments to sign on to reduce GHG emissions to net zero by 2050. At COP27 in Sharm El-Sheik, the Australian Government endorsed the Glasgow Breakthrough Agenda on Agriculture (GBAA),¹ a goal to make ‘climate-resilient, sustainable agriculture the most attractive and widely adopted option by farmers everywhere by 2030’. In line with COP27 commitments, the Australian Government has legislated targets to reach net zero emissions by 2050, and to reduce greenhouse gas emissions 43 percent below 2005 levels by 2030.

However, Australia’s climate commitments are seriously undermined by its reliance on carbon credits to meet emissions reductions targets. The Safeguard Mechanism currently allows emitters to offset 100 percent of their emissions through the purchase of carbon credits, and according to the Australia Institute, as much as 80 percent of credits are ‘junk’, leading to very little or no real carbon sequestration at all.²

AFSA and its members promote the application of agroecology to address the climate crisis, as detailed in the next chapter. Agroecology is both a movement and a practice that works with nature to enhance biodiversity and restore agricultural land and water, sequestering carbon and producing systems that are more resilient in the face of escalating climate-change-induced natural disasters.

Through this framing, we welcome the opportunity to provide input to the Victoria’s Climate Change Strategy 2026-2030. We commend the State Government for being proactive in its responsibility to safeguard the State against current and future climate change impacts.

AFSA asserts that Victoria’s food system is both contributing and vulnerable to climate change. The State Government must acknowledge that the dominant industrial model on which our food system is built upon cannot be fundamentally incompatible with the need for effective implementation of climate policy.

Instead, enabling legislation and policies to scale out agroecology-oriented farming to enhance biodiversity, reduce emissions, nurture land, water and soil health, and improve animal welfare must be considered in the development of Victoria’s Climate Change Strategy. In 2022, AFSA updated its Peoples’ Food Plan, which provides context, recommendations and false solutions on how we can transform the food system at a national and sub-national level through agroecology as a place-based pathway which incorporates local and traditional knowledge to improve the social and ecological functions of food production.

¹ DCCEE, 2022

² The Australia Institute, 2023

First Peoples First: Caring for Country is climate justice

AFSA notes a clear deficit in the *Summary paper on Victoria's climate action*, which undermines the critical role that First Peoples play in Caring for Country; land, water and soil. While there are efforts to support First Peoples' "self-determination in climate adaptation planning and implementation across the water cycle system, including the trial watering of the Durdidwarrah wetland by the Wadawurrung Traditional Owners Aboriginal Corporation", this must be extended to place-based policies that enable First Peoples to apply traditional laws and knowledges to climate change mitigation and adaptation.

Aboriginal and Torres Strait Islander peoples occupy a unique position as the First Peoples of this Country - what is now known as Australia - and as the custodians of Country for millennia. It is through their **custodial ethic**, 'an ancient reciprocal relationship with nature; an ethic of looking after, stewardship, caring for, and the obligation to look after land'³ that First Peoples were, and continue to be, nurtured and sustained by the land. Country and People are one.

First Peoples have long articulated colonialism's effect on Country: that it is hurt, and in need of healing. As we attempt to reset relations, we know that healing happens from the ground up, for 'when you heal Country, you heal yourself'⁴. These Indigenous relations with Country direct us to understand the ultimate life-giving, nourishing and nurturing role of Country in providing food.

It is only when non-Indigenous people realise that our system, while bringing certain material benefits to us, is ultimately imperilling our survival because it is attended by 'ecocide' (destruction of the environment) that we will begin to act and to turn to Indigenous people as a resource to value and to learn something from (Robbie Thorpe, interview).⁵

Global food systems have been failing people for a long time, and the voices of Indigenous Peoples are often excluded from the conversations of sustainable food systems that they should be driving. Food sovereignty centres knowledges that are place-based, offering a political vision and framework for asserting everyone's right to nutritious and culturally-appropriate food produced and distributed in ethical and ecologically sound ways, and our right to democratically determine our own food and agriculture systems.⁶

Indigenous knowledges and land management principles and practices should be prioritised, embraced and incorporated in a substantive sense into all proposed policy reforms for food security and land and water use in Australia, with full self-determined participation of and leadership from First Peoples.

A part of the urgent need for truth-telling of the impacts of colonisation on land, peoples, 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 acknowledge and respect Indigenous ways of relating to land and water, as well as many Indigenous land and water management practices, is therefore manifest.

³ Graham, 2013 (p.2)

⁴ Graham, 2021

⁵ Land, 2015 (p.216)

⁶ Nyéléni, 1996

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.

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As such, AFSA recommends that the Victorian Government:

- Learn across state jurisdictions, such as the Victorian Traditional Owner Native Foods and Botanical Strategy⁸, and Queensland’s Biodiscovery Regulation (2021)⁹ to develop a coordinated national strategy.
- Provide funding for all Victorians to undertake First Peoples cultural education, preferably delivered by the Original Custodians of the land people live on.
- Recognise First Peoples’ right to relate to Country by providing unfettered access to Country - starting with all public lands. Governments must:
 - Remove land-use regulations that restrict First Peoples’ access to public lands;
 - Enact legislation to ensure First Peoples have access to cultural food provisioning practices on Country;
 - Develop a Traditional Knowledge Code of Practice in consultation with Indigenous communities to require benefit-sharing negotiations;
 - Embed First Peoples’ food, land, fire and economic 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; and
 - Include First Peoples’ input through culturally-appropriate engagement practices in the development of land and water resource management and planning.
- Recognise First Peoples’ right to relate to Country by promoting access to Country on private lands.
 - Support partnerships between First Peoples and private landholders to give access to Country for social, cultural and economic purposes, in adherence to CSIRO’s Our Knowledge Our Way guidelines;
 - Provide funding and opportunities for horizontal knowledge exchanges between First Peoples and farmers (and other landholders); and
- Consider First Peoples’ customs and protocols on engagement and consultation. For example, settler-colonial priorities often value time and urgency over trust and relationships.

⁷ Gammage & Pascoe, 2021 (p.169)

⁸ Federation of Victorian Traditional Owner Corporations, 2022

⁹ Queensland Regulation, 2021

Land and water use (Planning Law)

AFSA asserts that significant reforms around land and water use need to be addressed by the Victorian Government in order to reduce the impacts from development and industrial production on the environment.

Issue: Protection of agricultural land

Loss of agricultural land through changes in zoning, inappropriate development and resource extraction, carbon and biodiversity ‘farming’ and renewable energy production that take land out of production, as well as loss of soil and water through damaging practices, export, and waste, will have permanent and irreversible negative impacts on the ability of Australia to produce and supply food to its citizens now and in the future. And with approximately 17.3 million people living in our eight capital cities, the issue of food production and protection of agricultural land adjacent to these areas has never been more important.

The pressures of a growing population must be dealt with in the residential suite of zones, not in zones intended to support food production (e.g. Farming Zone, Primary Production, Rural Landscape, and Primary Production in Small Lots zones, to name a few from Victoria and NSW). 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 governments continue to allow inappropriate development and urban growth onto 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.¹⁰

Local governments should prioritise keeping agricultural land in agroecological production, through rates rebates for primary production and innovations such as the ‘open spaces tax’ in Boulder, Colorado, or the French SAFER model¹¹.

Recommendations

To ensure the protection of agricultural land, AFSA recommends that the Victorian Government:

- Halt negative drivers and meet obligations through policy for the targets of the *Kunming-Montreal Global Biodiversity Framework* with regard to land-use change and land-use intensification which are major drivers of biodiversity loss.
- Introduce a system of government land acquisition to create public land banks through local taxes to prevent agricultural land being developed for non-agricultural uses, such as the *Boulder Open Spaces Tax*.

¹⁰ Sydney Food Futures, 2015-2016

¹¹<https://www.accesstoland.eu/Unique-land-agencies-the-SAFERs#:~:text=SAFERs%20are%20the%20cornerstone%20of,balanced%2C%20sustainable%20rural%20land%20development.>

- Identify and define ‘Food Lands’ and legislate that they must be used such as, as is the case with agricultural lands protected by SAFER in France (see Case Study below).
- Work collaboratively with local governments to enable dwellings for more farmers to live and work on farms (including under 40ha). This would provide young people with access to farmland and address the issue of an ageing workforce, as well as opportunities to build and share skills. Under this type of policy, local governments could be responsible for approving applications if it is clear that dwellings are being used for agricultural purposes and require a covenant to keep the land in agriculture.
- Map all agricultural land and water catchments, and protect them from resource extraction and housing development, as well as carbon and biodiversity ‘farming’ or renewable energy production that take land out of food production.
- Develop a mechanism to financially account for loss of soil, carbon, and water through industrialised food and agricultural systems by subsidisation of agroecological land management or building this cost into food prices through taxation.

Issue: Climate change poses a threat to inland water

The 2022 State of the Environment report flags climate change as a serious threat to inland water supply as Australia faces increasingly dry conditions and prolonged drought.¹² The report states that water use, particularly from irrigation, is a major pressure on Australia’s water supply and will continue to be constrained under a changing climate. Industrial-scale farming uses a significant portion of Australia’s total water supply, where in 2020-21, 73 percent of water was applied to crops in the production of food and fibres.¹³

Historically, water has been held in the soil and landscape. This continues to decrease over time due to the introduction of colonial agriculture systems, including sheep, cattle, monocultures of annual crops (many ill suited to a water scarce continent), 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.¹⁴

Water must be viewed as a vital part of sustaining all life, from soils and crops, to animals and human beings. For over 65,000 years First Peoples have adopted this way of thinking and interacting with water as kin, not as a commodity. In Western Australia, there is critical work being done by the Martuwarra Fitzroy River Council, an Indigenous-led organisation guided by a diverse representation of senior elders with

¹² Green & Moggridge, 2021

¹³ Australian Bureau of Statistics (2020-21)

¹⁴ Vanweydevel, 2022

cultural authority, knowledge holders on the front line, defending against the destruction of cultural heritage, ecological damage, poverty and climate change.¹⁵

It is the Council's aim to ensure that the Martuwarra Fitzroy River has its rights to live and flow protected as a living ancestor. First Peoples' knowledge in caring for Country extends to water as kin, where songlines and traditional knowledges are passed down by generations to understand the Original Custodians' connection to River, where she came from and where she is going.

The Council also aims to engage in a consultative process with government and other stakeholders to ensure co-design includes co-decision making on water planning and adaptive management to fully understand the cumulative social, cultural and environmental impacts of water allocation plans across the Catchment. It is this blend of Indigenous wisdom and scientific knowledge that supports agroecological approaches to sustainable water management and water justice.

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 has included:

- Reintroduction of a natural valley flow pattern, reconnecting the stream to its flood plain, which reintroduced a more natural hydrological and fertility cycle to that landscape; and
- A managed succession of the vegetation (mostly weeds initially), so that the natural fluvial pattern could be 'regrown', to redistribute nutrients and biomass harvested on the flood plain throughout the property and obviously through the stock.¹⁶

There is an imbalance towards water access licences for 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, in addition to maintenance of the health of environmental and cultural flows. Grassroots initiatives such as the Mildura Community Water Bank¹⁷ should be promoted and subsidised to ensure equitable access for small-scale agriculture, especially that of priority populations such as refugees and migrant communities.

Nature is not capital and should not be dematerialised and traded on open markets - the current model of trading water access licences on the Murray Darling Basin negatively impacts First Peoples and cultural outcomes, the environment 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 and 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 industrial agriculture – in particular the cotton industry, which by its own admission uses a staggering 26% of all Australian agricultural irrigation water¹⁸ *and then exports 99 percent of their product* – resulted in a proposed amendment to take 70GL out of the system further upstream instead of retaining

¹⁵ Martuwarra Fitzroy River Council, n.d.

¹⁶ Peter Andrews Oam, n.d.

¹⁷ Mildura Community Water Bank, n.d.

¹⁸ Cotton Australia, 2023

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 a few large farms to quite literally ship our scarce water resources overseas for profit.

The Great Artesian Basin (the Basin) is one of the largest underground freshwater resources in the world. It underlies approximately 22 percent of Australia –an area of over 1.7 million square kilometres beneath arid and semi-arid parts of Queensland, New South Wales, South Australia and the Northern Territory. Whilst also subject to major water extraction from pastoral, mining and domestic uses, the Basin is an example where issues have been identified and are being addressed through a collaborative approach of state and federal governments and stakeholders via the Strategic Management Plan.¹⁹ Over the last few decades practical changes to water management and transparency through the capping of bores, measurement of take, water pressure and both community and school education have seen improvements in the health of this important resource. Today there is greater recognition of the Basin as a highly valued water source which provides diverse benefits and opportunities. Basin springs have enabled Aboriginal and Torres Strait Islander people to occupy dry inland areas of Australia for more than 40,000 years, and communities maintain cultural, social and spiritual connections with Basin springs and their associated ecological communities and landscapes. The provision of drinking water through domestic bores and town water supply has been essential to the development of regions within the Basin and is used in more than 120 towns and settlements.

Demographic growth and economic development are putting unprecedented pressure on renewable, but not infinite water sources. This is especially so in relatively arid regions such as in the southeast of Australia. According to the United Nations' Food and Agriculture Organisation (FAO), 800 million people are expected to be living in countries or regions with 'absolute' water scarcity (<500 m³ per year per capita), and two-thirds of the world population could be under 'stress' conditions (between 500 and 1000 m³ per year per capita) by 2025.²⁰ Recognising the growing challenge of water scarcity, the UN General Assembly launched the Water Action Decade²¹ on 22 March 2018 to mobilise action that will help transform how we manage water.

Governments are compelled to ensure that water governance addresses issues of access, rights and tenure from the perspective of sustainability, inclusiveness, and efficiency. The FAO notes that:

to a significant extent, the over abstraction of ground water reflects the incentives that users face resulting from both market and policy failures. The available enabling frameworks and guiding principles are in insufficient use and there is a paucity of responsible collective action. This is one of the root causes of groundwater depletion and degradation of aquifers, and urgent call to action is needed if trends in the state of this resource are to be reversed.²²

¹⁹ Department of Agriculture, Water and the Environment, 2022

²⁰ FAO, n.d.

²¹ Water Action Decade, n.d.

²² FAO, 2016

In response to these pressing concerns and known causes, the FAO's Shared Global Vision for Groundwater Governance²³ formulated an agreement between governments of the world that by 2030:

- There are appropriate and implemented legal, regulatory and institutional frameworks for groundwater that establish **public guardianship and collective responsibility**, permanent engagement of stakeholders and beneficial integration with other sectors, including other uses of the subsurface space and its resources; and,
- All major aquifer systems are properly assessed, with the resulting information and knowledge shared, making use of up-to-date communication techniques.

AFSA notes two major issues with water managed under current government policy:

1. Concurrent policies that support industrial-scale agriculture and increased productivity will only continue to put strain on inland water resources with or without a management plan; and
2. No existing government policy effectively recognises First Peoples as the rightful custodians of water, to manage and protect water.

Recommendations

To address these issues, AFSA recommends that the Victorian Government:

- Develop planning legislation, capacity building (led by farmers) and provide financial resources for landholders to work to restore natural flows.
- Promote and learn from the efforts of local leaders in landscape rehydration (e.g. First Peoples, Peter Andrews, and the Mulloon Institute).
- Reform the Murray Darling Water trading scheme in collaboration with stakeholders and the Federal Government so farmers can access and pay a fair price for water, while eliminating water trading.
- Support grassroots initiatives such as the Mildura Community Water Bank (MCWB)²⁴ to ensure equitable access for small-scale agriculture, especially that of priority populations such as refugee and migrant communities.
- Enact a Water Bottle Policy across all State Government institutions to prevent the sale and distribution of bottled water (unless necessary).

Reducing agricultural emissions throughout the value chain

According to the *Summary paper on Victoria's climate action*²⁵, the State's food system is a significant contributor to annual GHG emissions: with 18.3% attributed to agriculture from livestock and fertiliser

²³ FAO, 2016

²⁴ Mildura Community Water Bank, 2023

²⁵ <https://engage.vic.gov.au/download/document/39043>

emissions; and 3.8% attributed to food and plant waste breaking down in landfills, and treatment of wastewater.

It is critical to consider how the food system contributes to climate change throughout the value chain, from production through to processing and distribution to consider an holistic approach to reducing emissions through agroecology. Below are the key issues that are impacting Victoria's ability to effectively mitigate climate change and adapt to severe weather events.

Issue: productivism and exports continue to underpin federal and state government policies

Growth and exports are the enduring 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 percent of Australia's food, while exporting some 72 percent of what we produce. Meat producers are among the largest exporters, with on average 75 percent of beef and veal, and 73 per cent of lamb and mutton, sent offshore. As governments call for higher productivity and more exports, we should ask:

Why should a highly productive, net-exporting country seek to export more of our precious soil and water in the form of commodities for the profit of a few?

Meanwhile, concerns about future food security are rising, particularly in Australia where climate change impacts are already leading to degraded and increasingly inhospitable conditions to grow food. However, Australia currently produces enough food per year to feed 80 million people, with around 72 percent exported overseas, and yet one in six Australians (17%) were considered severely food insecure in 2021. It is estimated that Australia's population will grow to 50 million by 2050 – if farmers were to keep producing food at the current rate, we'd still have surplus to feed an extra 30 million people by then. So why do we keep hearing about the promise of technology and nature-based solutions to increase agricultural yields?

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'. To take but one example of the ways in which our precious soil and water are used and shipped overseas, 26 percent of Australian agricultural water is used to irrigate cotton, 99 percent of which is exported by 1500 farmers. This means that .006 percent of the population use 26 percent of agricultural water for their own benefit, water that is increasingly needed to keep ailing rivers and ecosystems alive.

Recommendations

In order to move away from export-focussed food and agricultural policy, which has a number of detrimental social and ecological impacts, we recommend that the Victorian Government:

- Alter current Agricultural Census data collection to ensure proper representation from small scale farmers and 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.
- Survey the extensive research completed²⁶ 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. In order to lessen the disadvantage already encountered by communities located in outer regional and remote areas who pay increasingly more for food than their urban counterparts.
- Develop a dedicated grant scheme to support localised distribution models, especially in their initial stages, to help to grow these models and ensure their longevity. Recognising that access to fresh, healthy, and locally produced food is often precluded by geographical location and socio-economic status (which themselves are interlinked), AFSA recommends that grants servicing distribution in low socio-economic areas are prioritised, and that consideration is given to subsidising the price of produce to increase accessibility while maintaining farmer livelihoods.
- Enable/support/fund local communities to develop searchable databases of food producers and alternative distribution models for farmers to connect with other local farmers, and for eaters looking to be matched with local farmers.
- Publish a series of 'how-to' guides to assist in the development of alternative distribution models. These guides should be informed directly by small-scale farmers and civil society to ensure pathways to alternative distribution models are reflected accurately in government resources.

Issue: Farmers are losing access to processing infrastructure

For decades, farmers have been losing access to critical infrastructure to transform whole produce into market-ready food. The most notable examples include the concentration of dairy processing (in 2015-16 just five processors processed 79 percent of volume produced) and abattoirs (in Victoria there are just two poultry processors remaining for private kills, only one of which sometimes accepts new farmers, with devastating effects on the capacity for the small-scale poultry farming movement to grow), as well as boning rooms as further processing is increasingly completed in abattoir boning rooms and meat sold as boxed meat to supermarkets and high street butchers. At the time of writing, Woolworths has just announced the closure of the majority of its in-store butchers,²⁷ with Coles having stopped in 2021.²⁸

Small-medium scale farmers urgently need access to micro and mobile abattoirs, as well as other vital infrastructure, to process animals and feed local communities. It is these farmers that practice agroecological and regenerative farming, including pastured livestock management, that can effectively

²⁶ See Estrada-Flores & Larsen, 2010 ; Tarkunde, 2021

²⁷ Vidot, 2023

²⁸ Stone, 2021

result in reduced emissions by allowing animals to roam free on-farm, and through practices such as rotational grazing and nutrient cycling.

Recommendations

In order to prevent small-medium scale producers from losing access to critical processing infrastructure, we recommend that the Victorian Government:

- Urgently implement Recommendation 27 of the Parliamentary Inquiry into Securing the Victorian Food Supply:
 - That Agriculture Victoria work with the Victorian Farmers Federation, PrimeSafe and commercial abattoirs to negotiate small livestock producers' ongoing access to kill facilities in the short-to-medium term. The Victorian Government amend the Meat Industry Act 1993 (Vic) to specifically provide for and define micro-abattoirs and the Victorian Planning Provisions to introduce micro-abattoirs (including mobile micro-abattoirs) as a Section 1 use in the Farming Zone, Rural Activity Zone, Green Wedge Zone and the Green Wedge A Zone. The Victorian Government support small scale livestock producers to establish micro-abattoirs (including mobile micro-abattoirs) in communities which can demonstrate a need for this critical shared agricultural infrastructure.
- That the Victorian Government apply the standards set out in AS4464:2007 *the Australian Standard for the Hygienic Production of Wild Game Meat for Human Consumption*, which could be safely applied to domestic livestock, enabling them to be slaughtered on farm, chilled and inspected, and subsequently transferred to a licensed butcher for further processing. This would support the survival of small-scale livestock farmers.

Issue: More food is wasted than is needed to feed hungry Australians

The supermarket duopoly headed by Coles and Woolworths also leads to significant food waste at harvest. 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.²⁹ 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.³⁰ 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:

²⁹ Richards and Devin, 2017

³⁰ Goldenberg, 2016

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.³¹

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. Australian food supply chains have lengthened in recent years in response to consolidation policies of the dominant supermarkets, which have reduced the number of distribution centres in order to maximise economic efficiencies. 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 a greater diversity of direct sales channels. Entities such as Open Food Network³² rose to the challenge to bring a thrilling wave of new farmers onto 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.³³ 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.³⁴ 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 connection with the people who eat their produce, while connecting eaters with the places and people who grow their food. 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. In addition to scale-appropriate regulation, policymakers can strengthen localised food economies by removing obstacles for small-scale food producers throughout the value chain from production and

³¹ Knox, 2014

³² <https://openfoodnetwork.org.au/>

³³ Hartley and Hughes, 2020

³⁴ Baczkowski, 2020

processing, right through to distribution and consumption. For example, a key barrier to resilient local food systems in Australia is a lack of processing infrastructure for small-scale farmers (see issue above)³⁵.

Recommendations

In order to reduce emissions from food waste across the State, we recommend that the Victorian Government:

- Support food value chain platforms, incubators and aggregation mechanisms in which public bodies invest and reward sustainable food producers and the production of public goods, to:
 - Fund the development of community-led local and regional processing hubs and distribution channels that provide greater processing and handling capacities for fresh products from small and medium-sized farmers adopting agroecological approaches and improve their access to local food markets;
 - Provide incentives for First Peoples, young farmers and food producers, women and community-led enterprises that capture and retain value locally, recognizing and addressing their specific constraints and needs; and
 - Adapt support to encourage local food producers, food enterprises and communities to build recycling systems by supporting the reuse of animal waste, crop residue and food processing waste in forms such as animal feed, compost, bio gas and mulch.

Issue: GMOs and AgChems - elixirs of death?

AFSA notes that nowhere in the *Summary paper on Victoria's climate action* are the use of agricultural chemicals and GMOs mentioned, despite their devastating toll on human and environmental health. Taking a firm stance against the encroaching threat of deregulated GMOs in our food system is not about serving our own interests as producers of agroecological or organic foods. Rather, it is a stance against insidious forms of violence in our food system since the introduction of agricultural chemicals (AgChems) following World War II. Perhaps a better way of talking about the dangers of GMOs repeating the history of AgChems is not so much about manipulating nature for 'the greater good' to produce food for people in a changing climate. Rather, GMOs and AgChems are poisoning nature so that powerful corporations can continue exploiting people and planet for profits. Let's consider the origin of AgChems. It was Rachel Carson who lifted the lid on the violent history of AgChems in her groundbreaking book, *Silent Spring*, which was instrumental in the emergence of the environmental movement in the 1970s. The chapter *Elixirs of Death* uncovers that the AgChem industry, now a ubiquitous force in industrial food production, is 'a child of the Second World War.'³⁶

In the course of developing agents of warfare, some of the chemicals created in the laboratory were found to be lethal to insects. The discovery did not come by chance: insects were widely used to test chemicals as agents of death for men.

³⁵ <https://afsa.org.au/media-release-afsa-responds-to-730-report-on-co2-stunning-of-pigs-calls-for-small-scale-local-abattoirs/>

³⁶ Rachel Carson, 1962, Book: *Silent Spring*, Chapter 3; *Elixirs of Death*.

Today, there are around 1400 AgChems used in agriculture across the globe. These chemicals are referred to as pesticides broken down into five key categories: herbicides that kill invasive weeds and plants; insecticides that kill insects and arthropods; rodenticides to kill mice and other rodents; fungicides that kill fungi; and molluscicides that kill mollusks.³⁷ The key word we use here is kill, because these chemicals were designed by companies whose very purpose is to profit from warfare. Chemical and pharmaceutical company I.G Farben was responsible for developing Zyklon B, the nerve agent used to kill Holocaust victims in concentration camps during World War II. When the war ended, these companies turned their attention to using chemicals of warfare to kill nature, by marketing nerve agents to farmers as a modern breakthrough in pest-control, rather than the agents of genocide. Most people alive today will recount the horrific images of Vietnamese civilians—including children—being sprayed by 19 million gallons of chemical herbicide Agent Orange by the US military from 1962-1971. Agent Orange was produced by Dow and Monsanto, two of the largest chemical corporations controlling the AgChem market in 2023. In recent years, the US Department of Agriculture (USDA) approved Dow's new Agent Orange GMOs designed to grow herbicide-resistant corn and soybeans, a decision which mobilised 400,000 farmers to campaign against chemicals of warfare being used in agriculture.³⁸

We must acknowledge the parallels between AgChems and emerging GMO technologies being rooted in violence against nature, including we, the people. Humans are a part of nature and we must consider the long-term implications of AgChems and GMOs on human and environmental health.

Recommendations

In order to reduce the number of GMOs and agricultural chemicals poisoning soil, land, water, animals and humans, we recommend that the Victorian Government:

- Amend food labelling standards to include Genetically Modified Organism (GMO) ingredients;
- Establish a Fund to allow simple and efficient compensation for losses suffered by non-GM landholders whose land is contaminated by GM crops, seed, or other GM material;
- Make GM seed and plant merchants responsible to compensate landholders when GM contamination occurs, by requiring GM merchants to pay a levy on seed sales into the Fund;
- Increase regulation to limit GMOs until rigorous, peer-reviewed research is undertaken to determine the health and ecological impacts of GMOs
- Enact legislation whereby any incentives that are harmful to biodiversity need to be identified and eliminated or repurposed by 2030 in alignment with and exceeding the ambitions in the goals and targets of the Kunming-Montreal Global Biodiversity Framework.³⁹
- Phase out the use of HHPs as a necessary measure to meet biodiversity targets. 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.

³⁷ Shiva, V. (2016)

³⁸<https://www.sustainablebusiness.com/2014/03/400000-farmers-health-professionals-want-usda-to-reject-agent-orange-gmo-52205/>

³⁹ Convention on Biological Diversity, 2022

- Enact legislation on reducing nutrients lost to the environment: Excessive use of organic and synthetic fertilisers leads to pollution levels that destroy sensitive plants and animals, and affect water bodies and terrestrial ecosystems such as meadows and forests.
- Ban the use of synthetic pesticides. 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.

Issue: Ultra-processed foods (UPFs)

Ultra-processed foods (UPFs) are characterised as formulations of mostly cheap industrial sources of energy, nutrients and additives, resulting from a series of industrial processes.⁴⁰ They include soft drinks, snacks, reconstituted meat products, and prepared frozen dishes, but also bio-fortified foods, supplements and ultra-processed plant-based meats.⁴¹ They are made to be convenient (durable and ready to consume), attractive (hyper palatable) and highly profitable (low cost ingredients). However this technical advancement has transformed the food system around key health, economic, political and environmental crises. The low-quality and industrial composition of UPFs makes them high in saturated fats, depleted in dietary fibre, various micronutrients and other bioactive compounds. As UPFs dominate the food supply of high, middle and lower-income countries alike,⁴² this has resulted in a global pattern of unhealthy dietary nutrient profiles and diet-related non-communicable disease.

The transnational corporations (TNCs) producing and marketing UPFs (such as Nestle, Pepsico, Unilever & Kellogg's) are oligopolistic, often displacing authentic established food systems and cultures.⁴³ The transnational networks of cheap sourcing of ingredients (such as oils, sugars and starches) needed for UPFs transforms national agricultural production towards monocultural crop production, making the livelihoods of small-scale farmers more vulnerable.⁴⁴

Recommendations

AFSA urges the Victorian Government should carefully consider how the rise of UPFs will have significant impacts on human and ecological health, where the strain of production to produce such “foods” will actively contribute to a rise in GHG emissions and climate change impacts. As such, we recommend that the Victorian Government:

- Intervene at the retailer level to improve product selection, promotion, pricing, and placement of locally produced whole foods (as well as reducing the sale/exposure of ultra-processed foods).

⁴⁰ Monteiro, Carlos Augusto et al. (2018). 'The UN Decade of Nutrition, the NOVA food classification and the trouble with ultra-processing'. *Public Health Nutrition*, 21(1)

⁴¹ <https://www.fao.org/3/ca5644en/ca5644en.pdf>

⁴² Scrinis, G. and Monteiro, C., 2022. From ultra-processed foods to ultra-processed dietary patterns. *Nature Food*, 3(9), pp.671-673

⁴³ Baker P, Machado P, Santos T, Sievert K, Backholer K, Hadjidakou M, Russell C, Huse O, Bell C, Scrinis G, Worsley A. Ultra-processed foods and the nutrition transition: Global, regional and national trends, food systems transformations and political economy drivers. *Obesity Reviews*. 2020 Dec;21(12):e13126

⁴⁴ Monteiro, Carlos Augusto et al. (2018). 'The UN Decade of Nutrition, the NOVA food classification and the trouble with ultra-processing'. *Public Health Nutrition*, 21(1)

- Make available healthy food and drinks and restrict unhealthy food and drinks at all food outlets and vending machines in facilities managed by the government (e.g. local government early childhood centres, train stations) and government office/operational buildings.
- Empower and enable local governments to make planning decisions based on the health and wellbeing interests of residents - e.g. being able to reject development applications from fast food outlets without being taken to court.
- Strengthen government procurement rules to ensure that taxpayer money is spent on healthy and sustainable food.
- Turn over unused urban land (tiny verges on street corners, vacant car parks and large empty lots waiting for development etc.) for community gardens and must support the development as public infrastructure.

False Solutions

False solutions are measures that propose to address climate change, biodiversity loss, hunger, poverty, pandemics, and other global crises that fail to address the economic, social and ecological roots of the crises caused by colonial capitalism. They may offer a short-term improvement, and are often framed in a way that deceives people with high tech and undemocratic approaches. These failures have the potential to create further social and ecological destruction, felt by marginalised communities first and foremost.

False solutions include technologies and policies at a global, national and sub-national level, that:

- Fail to reduce emissions or biodiversity-damaging practices where there is a continued focus on growth and exports;
- Generate environmental, social, economic and political problems and consequences, and result in the violations of human and collective rights; or
- Distract people and policy makers from real solutions; and direct public financing, infrastructure and institutional support away from the actions needed for systemic changes.

In the case of Victoria's Climate Change Strategy 2026-2030, we urge the Victorian Government to avoid opting for the following false solutions:

- **Nature as capital** - the financialisation of nature is actively extending the frontier of colonial capitalist accumulation across the living Earth. Whether motivations are derived from well-meaning pragmatism or neoliberal ideology, the crudeness of these efforts is backfiring as farmers and First Peoples are rewarded with carbon credits that are sold to the highest emitters. In place of greater

value-realisation for Earth's wonderful biodiversity, a crude market for dumbed-down ecosystem services has come to the fore.⁴⁵

- **Regenerative Agriculture as an industry rather than a movement** - while there are many thoughtful and committed practitioners of regenerative agriculture, too much of what is promoted as regen ag is greenwashing industrial agriculture with better inputs (e.g. Cargill,⁴⁶ General Mills,⁴⁷ Nestlé,⁴⁸). Its ecological contributions can be significant, but ultimately iterative rather than transformational because regenerative agriculture lacks a political framework and theory of change that incorporates the urgent need for social, economic and ecological justice for all.
- **Nature-based solutions as offsets** - this leans on agricultural innovations and technologies for the purpose of promoting carbon and biodiversity offsets that can be used as credits by governments to meet critical climate change reduction targets. Nature-based solutions are more accurately described by the food sovereignty movement as 'nature-based dispossessions' as they enable agribusiness to claim large amounts of land, forest and water from smallholders and Indigenous Peoples, particularly in the Global South.⁴⁹ In addition, concepts such as 'nature-positive' and 'net zero' are a weak measure for reducing emissions and halting biodiversity loss, where viewing nature through the lens of economics assumes that fossil fuel emissions can be permanently absorbed in equal amounts in forests, soil and oceans.
- **Nature-based solutions for higher productivity** - approaches like climate-smart agriculture, sustainable intensification, and precision agriculture focus largely on yields and system stability, rather than solutions that address the complex social and political issues related to industrial agriculture. They 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 food system transformation based on the needs, knowledge, priorities and agency of people and nature, rooted in territories.⁵⁰
- **Produce more to feed the world.** Productivism has underpinned Australian agricultural policy since the rise of neoliberalism in the 1980s, placing increasing pressure on farmers to compete on price and volume of production to the detriment of social and ecological welfare.⁵¹ Farmers who cannot afford high-tech equipment to keep up with increased domestic and export demands are being forced out of farming as large-scale agribusiness monopolises the market. The Australian Government's plan to grow agriculture to a \$100 billion industry is a false solution, built on decades of social and ecological exploitation of agricultural workers, land and water. Few farmers will benefit from the notion that increased productivity will reap economic benefits felt in their own pockets. Scaling up agriculture for productivity and exports further encourages monocultures as a threat to biosecurity, and overproduction where land and water is degraded.
- **Philanthrocapitalism.** In the face of growing social, ecological, economic and political crises, a handful of the world's richest people are emerging with so-called solutions to complex problems such as food insecurity in developing nations which are pushed through philanthropy. For example, the Bill and Melinda Gates Foundation funds agricultural research and development in Africa,

⁴⁵ Rappell, 2021

⁴⁶ Cargill Incorporated, 2023

⁴⁷ General Mills, n.d.

⁴⁸ Nestle, n.d.

⁴⁹ Local Futures Economics of Happiness, 2022

⁵⁰ Anderson & Bruil, 2021

⁵¹ Lawrence, Richards & Lyons, 2013

eroding smallholders and civil society's right to determine their own food system and practise horizontal knowledge sharing.⁵² Putting control over food systems in the hands of billionaires to solve the world's problems ignores the notion that accumulating such extreme wealth requires exploitation of workers, Indigenous Peoples and civil society.

Transition to Agroecology

Instead of false solutions peddled by corporates and investors, AFSA calls for agroecology as the *real* solution to ethical and ecologically-sound food and agriculture systems, while also addressing social, political and economic inequities in food systems. The UN Food and Agriculture Organisation (FAO) provides a clear definition of agroecology as both a science and a social movement:

Agroecology is a holistic and integrated approach that simultaneously applies ecological and social concepts and principles to the design and management of sustainable agriculture and food systems. It seeks to optimise the interactions between plants, animals, humans and the environment while also addressing the need for socially equitable food systems within which people can exercise choice over what they eat and how and where it is produced. Agroecology is concurrently a science, a set of practices and a social movement and has evolved as a concept over recent decades to expand in scope from a focus on fields and farms to encompass the entirety of agriculture and food systems. It now represents a transdisciplinary field that includes the ecological, socio-cultural, technological, economic and political dimensions of food systems, from production to consumption.⁵³

Given that agroecology presents viable solutions to social, ecological, political and economic crises caused by industrial agriculture, it is a pathway toward food sovereignty.

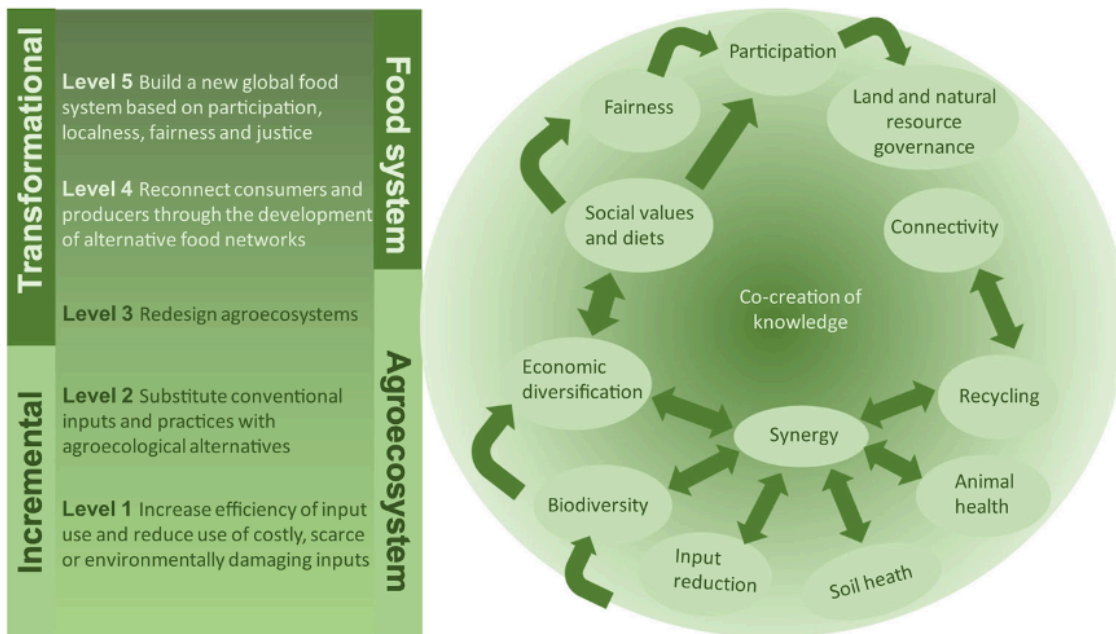
Around 70 percent of food in the world is grown by small-scale food producers on small plots of land, with the remaining 30 percent grown by large-scale industrial farms, which are responsible for 75 percent of ecological destruction from farming.⁵⁴ Beyond farming, 20 percent of the world's population uses 80 percent of its resources.⁵⁵ Clearly the Minority World (aka the Global North) is using more than its share, and something has to change.

⁵² A Growing Culture & Community Alliance for Global Justice, 2021

⁵³ Food and Agriculture Organization of the United Nations, 2023

⁵⁴ Shiva, 2017

⁵⁵ Friends of the Earth Austria, 2009



Transition to a degrowth economy

The Victorian Government needs to consider degrowth in agriculture and land sectors if it wants to safeguard Australia from climate and pandemic risks and related food insecurity. Degrowth does not mean less production of food, but rather a shift away from the policies and practices that support increased productivity and growth for the purpose of exporting food, ergo water and soil, to other markets. Central to degrowth is the principle of connectivity, which ensures proximity and trust between producers and eaters through fair and short (often direct) supply chains, and by re-embedding food systems in local economies. Degrowth can assure intergenerational justice, because ‘future generations should have access to the social and material means to live flourishing lives at least at the same level as the present generation.’⁵⁶

Transition to localised 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, and the increased threat brought by intensive livestock production in globalised markets.

In her book *Who Really Feeds the World: The Failures of Agribusiness and The Promise of Agroecology*,⁵⁷ Vandana Shiva explains the social and ecological value of localising food systems:

⁵⁶ Wright (2018: 10)

⁵⁷ Shiva, 2016

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 practise 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 to.⁵⁸

For governments and corporations, viewing food systems through the lens of localisation is in direct contrast with how they understand the generation of profits that inform policies to scale up farming using competitive incentives, technology and other market mechanisms. However, the COVID-19 pandemic, biodiversity loss, and climate change in Australia reveal the fragility of a globalised food system, and should prompt policymakers to consider how agricultural policy should support localisation and solidarity economies to safeguard food security.

Transition to democratic knowledge production

Where productivist food and agricultural policy encourages farmers to specialise, scale up, and outsource knowledge and inputs, localised economies support *scaling out* and diversifying through horizontal knowledge sharing farmer-to-farmer. Agroecology-oriented farming supports producers to effectively feed their local communities with healthy, nourishing foods, with clear boundaries where production puts a strain on ecological, social and economic limits.

The fact that agroecology is based on applying principles in ways that depend on local realities means that the local knowledge and ingenuity of farmers must necessarily take a front seat. This is in contrast to conventional practices, where farmers follow pesticide and fertiliser recommendations prescribed on a recipe basis by extension agents or sales representatives.⁵⁹

For a major change toward sustainability in food systems, there is a need to promote assemblages of farmers groups, food security and consumer networks, public policies and authorities, and non-human actors and infrastructures, in order to provide access for civil society organisations and agroecology-oriented farmers to the decision-making process.⁶⁰ Agroecology appeals to farmers in part because it diminishes their dependencies and builds their autonomy. Thus, agroecology grows best when it is not overly dependent upon external structures originating from NGO projects, research institutions, or public policies.⁶¹

⁵⁸ *ibid.*

⁵⁹ Rosset & Altieri, 2017

⁶⁰ González de Molina et al. 2019; Marsden, Hebinck, and Mathijs 2018

⁶¹ Mateo Mier y Terán Giménez Cacho, Omar Felipe Giraldo, Miriam Aldasoro, Helda Morales, Bruce G. Ferguson, Peter Rosset, Ashlesha Khadse & Carmen Campos (2018): Bringing agroecology to scale: key drivers and emblematic cases, Agroecology and Sustainable Food Systems