

NFF

*National Farmers'
Federation*

13 February 2004

Dr Neil Byron
Presiding Commissioner
Productivity Commission
Level 28, 35 Collins Street
MELBOURNE VIC 3000

**SUBJECT: INQUIRY INTO THE IMPACTS OF NATIVE VEGETATION AND
BIODIVERSITY REGULATIONS - NFF RESPONSE TO PRODUCTIVITY
COMMISSION DRAFT REPORT**

Dear Dr Byron

The National Farmers' Federation is very supportive of the Productivity Commission's findings, conclusions and draft recommendations as outlined in Chapter 9 of the Draft Report.

As you are aware, farmers need secure access over their land and native vegetation for investment security so that they can continue to be actively involved in sustainable agriculture. The draft recommendations reflect the need for clarity on this issue as well as providing substance to the frustration and concerns of many landholders with biodiversity and native vegetation regulations in most jurisdictions.

One area that we would have liked to see further fleshed out was the assessment of each of the State regimes and the necessary actions to improve them. The assessments in the Draft Report did not fully draw out the many inherent problems that are ingrained within State systems and processes for managing biodiversity and native vegetation.

NFF fully agrees with the Commission's plea on page 197:

“Whether or not the Commission's other recommendations are accepted, all jurisdictions should follow transparent and thorough processes when developing environmental policy, processes that seem to be well accepted and frequently applied in other areas of policy development.”

It is vital that all jurisdictions follow transparent and thorough processes that are nationally consistent and which provide low cost appeal mechanisms to individuals so that they have the ability to appeal to an independent arbitrator against decisions that affect them.

The National Farmers' Federation believes that Commonwealth, State and Territory Governments should adopt a national approach to land and native vegetation which would in turn provide farmers with the security they need to ensure that farming continues to be sustainable and environmentally sound.

Therefore, we would suggest that Commissioners consider including a recommendation that Commonwealth, State and Territory and Local Governments address the recommendations raised by the Productivity Commission through the development of an Intergovernmental Agreement as part of the Council of Australian Governments process.

I would like to thank the Commissioners for their time and considerable work on this issue, and NFF looks forward to seeing the final report once it becomes available.

Yours sincerely

Larry Acton
Chair
NFF Land and Native Vegetation Land Taskforce