

I've allowed VERY WIDE ACCESS to this document. Please use it as a template to frame your own response.

The overview document is here there may be other recommendations that you care about that I haven't commented on:

<http://www.pc.gov.au/inquiries/current/agriculture/draft/agriculture-draft-overview.pdf>

Also if you have additional concerns you should add them to the end of your response. I'm working on mine and this document will get edited during the day.

To whom it may concern,

the following are my responses to the draft productivity commission report Regulation of Agriculture.

Draft Finding 6.1

*The successful coexistence of GM and non-GM crops is possible and has been demonstrated both in Australia and overseas. This means that if there are any market access or trade benefits (including price premiums for non-GM products), they would be achieved regardless of whether GM crops are in the market.*

It has not been shown conclusively that GM and non-GM groups can coexist. In fact the opposite has been shown to be the case. Genetic contamination of crops or neighbouring land is quite common place and even contamination within the region in which a GM crop has been planted has been documented.

When such contamination has occurred there is no recourse for the owner of the contaminated crop. Worse they are often subjected to further costs to pay royalties for proprietary seed which they did not buy.

Consumers are well aware of this issue and as a result non-GM crops grown in regions or even nations with GM crops can not secure a premium price.

As the use of GMO increases it is becoming increasingly apparent that there are not any significant productivity gains from using GMO and I refer you to the report titled [Failure to Yield](#) published by the Union of concerned Scientists. Given that lack of significant productivity gains and significant economic risks there is every reason to ban the use of GMO in Australia. Therefore recommendation 6.1 should be withdrawn.

Draft Recommendation 8.2

*The Australian, state and territory governments should pursue road reforms to improve the efficiency of road infrastructure investment and use, particularly through the introduction of road-user charging for selected roads, the creation of Road Funds, and the hypothecation of revenues in a way that incentivises the efficient supply of roads.*

Requiring road user charging would add a further regulation to the sector. The government should make the road network available for the general use of society. If the government is finding that the use of the road network by heavy vehicles is causing extra maintenance costs of the road network then they should invest in more and better rail infrastructure to reduce the amount of heavy haulage on the road network.

#### Draft Finding 8.3

*Privatisation of major ports has the potential to increase economic efficiency, provided appropriate processes are followed to ensure that the public interest is protected through structural separation, regulation or sale conditions. Increasing the sale price of ports by conferring monopoly rights on buyers is not in the public interest.*

The privatisation and in effect the creation of privately owned monopolies has not yielded the economic benefits that were promised. Key infrastructure like roads, rail and ports should be retained by the state. In doing so the state can capture the full economic value of these assets.

I refer you to recent comments made by ACCC chief Rod Simms that privatising key public infrastructure and networks “has created unregulated monopolies that hurt productivity and damage the economy.

#### DRAFT RECOMMENDATION 8.5

*The Australian Government should amend coastal shipping laws by 2018 to substantially reduce barriers to entry for foreign vessels, in order to improve competition in coastal shipping services.*

Currently coastal shipping services must comply with Australian laws including industrial relations laws. Allowing foreign owned and operated coastal shipping services without requiring them to also be subject to Australian laws would be a seriously bad idea.

I refer you to comments made by cruise ship operator Bill Milby of North Star Cruises Australia: “The company's submission said the Department of Infrastructure and Regional Development official told the company: "If NSCA wanted to remain competitive with the foreign owned and crewed ships it should ... 'consider taking our ship 'True North' off the Australian Shipping Register, re-register the ship in a suitable foreign country, lay off our Australian crew and hire a cheaper foreign crew'."

"When she suggested this I told her that I could not believe the suggestion she made and she said ... 'to remain competitive in the world that is what we should do'."

The Australian public most definitely does not want policy that allows foreign workers to work in Australia under conditions and remuneration that inferior to those under which Australians are employed.

#### DRAFT RECOMMENDATION 9.1

*Food Standards Australia New Zealand should remove the requirement in the Food Standards Code to label genetically modified foods.*

Consumers want to be able to choose non-GMO foods. In order for them to do so it is essential that that food that contains GMO derived food products be labelled as such.

#### DRAFT RECOMMENDATION 9.2

Food Standards Australia New Zealand should review the standard for the level of gluten allowed in foods labelled as 'gluten-free', taking into account scientific evidence, international standards and risks to human health, and set a maximum allowable parts per million level for foods to be labelled 'gluten-free'.

If this recommendation the level below which food would be considered "gluten free" should be set independently by Australian Medical Association and relevant organisations such as Coeliac Australia.

#### INFORMATION REQUEST 9.2

The Commission is seeking information on the costs and benefits of egg stamping relative to alternative traceability systems for eggs (such as labelling on egg cartons and requiring food businesses to keep records). Are there examples where the source of an outbreak of salmonellosis caused by eggs could not have been traced in the absence of egg stamping?

First of all the risk posed to the Australian public by salmonella transmitted by eggs is extraordinarily low. So low that there has been no recent cases of salmonella transmission caused by eggs. Hence its not really possible to provide an example of where a salmonella outbreak caused by eggs was traced back to the producer of those eggs when those eggs where not stamped. Very hard to track something that didn't happen.

The regulation requiring eggs to be stamped is therefore an unnecessary and burdensome regulation on farmers in general and family farmers in particular.

#### DRAFT FINDING 11.2

*Existing competition regulation and oversight is adequate for managing the risk of supermarkets abusing market power in their dealings with farm businesses and wholesale merchants. Suggestions to amend exemptions that allow collective bargaining under section 45 of the Competition and Consumer Act 2010 (Cwlth) are unlikely to increase collective bargaining by farm businesses.*

Existing competition regulation and oversight has been manifestly shown to be grossly deficient. Abuses regularly occur and even when the regulator has taken action against the supermarkets the fines and sanctions have been woefully inadequate.

The suggestion to allow collective bargaining would allow farmers to legally work together without the need to work through a commercial entity such as a farm coop or farmer owned distribution company.

#### DRAFT RECOMMENDATION 12.1

*The Australian Government should increase the screening thresholds for examination of foreign investments in agricultural land and agribusinesses by the Foreign Investment Review Board to \$252 million (indexed annually and not cumulative).*

The Australian government should most definitely NOT do this. We need foreign investment and to get foreign investment we need the Australian public to widely support foreign investment. Such a move is likely to increase the Australian public's antipathy to foreign investment. If anything the Australian Government should lower the threshold and make the foreign investment more transparent for the benefit of Australia and foreign investors.

#### Issues not covered by the Productivity commission's draft report.

There seems to be a very antagonistic relationship between farmers and food processors on the one hand and regulators of food safety on the other. Throughout the draft report there are many references to policies being guided by "the best of science", "modern science", "latest scientific understandings" and the like but the regulation of food doesn't seem to be guided by science at all.

Some examples for you to consider.

Prime Safe killed the yabby industry in Victoria by deeming that live yabbies must be regulated as if they were dead, processed meat. The yabby industry was just starting to grow and the change in regulation killed the industry. The changes were made without justification. There was no food safety incident that needed to be addressed and

regulations used to rectify. Similarly the changes were made without any supporting scientific investigation, research or literature review.

Food standards as they are interpreted often mandate that wood can not be used in the preparation of food. No wooden benches, chopping boards, wooden handled knives or related implements or fixtures. Instead inspectors insists on stainless steel surfaces and plastic chopping boards. Scientific investigations have repeatedly found that stainless steel is only more hygenic surface on which to prepare food when the stainless steel is brand new. Once a stainless steel surface has seen even minimal use it actually supports more bacteria than a heavily used wooden bench. Similarly brand new plastic chopping boards have actually been found to be less hygenic than heavily used wooden chopping boards.

In the western world only one country other than Australia bans the sale of raw milk. When raw milk is produced with appropriate safe practices bacterial cell counts in raw milk are routinely lower than the standard required of pasturised milk often by a factor of ten. Given that bovine tuberculosis has been eliminated from the Australian herd and other pathogens can be managed just as they are managed in other fresh foods like fish and meat why are Australian producers denied this product. Why are Australian farmers particularly smaller scale farmer denied the ability to sell their milk raw when there is a large.

Some government bodies work well with farmers to support them to establish and grow their businesses. For example fisheries Victoria has a very collaborative and supportive approach. They are very helpful and forth coming with information to help existing a new entrants to aquaculture . Contrast this with the behaviour of Prime Safe which has a very combative approach to dealing with the people that it registers and is not at all supportive when it comes to helping farmers confirm with the regulations they administer.