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31 August 2016

Mr Paul Lindwall
Presiding Commissioner
Productivity Commission

By email

Dear Commissioner

RE: ALFA SUBMISSION PRODUCTIVITY COMMISSION DRAFT REPORT – REGULATION OF AGRICULTURE

Australian Lot Feeders' Association (ALFA), the peak representative body for the cattle feedlot industry, welcomes the opportunity to provide comment to the Productivity Commission Regulation of Agriculture draft report. ALFA's response to the draft recommendations and information request can be found at Appendix 1.

The grain fed cattle industry has a value of production of approximately \$2.6 billion and employs some 28,600 people directly and indirectly. Approximately 40% of Australia's total beef supply, 80% of beef sold in domestic supermarkets and the majority of beef industry growth over the last 15 years has been due to the expanding feedlot sector.

There are approximately 400 accredited feedlots in Australia located in areas that are in close proximity to cattle, grain, water and beef processing facilities. The majority of feedlots are located in Queensland followed by NSW, WA and then Victoria and South Australia.

Around 98% of feedlots are owned by Australian farming families with the remaining 2% owned by vertically integrated processors. The Australian cattle feedlot sector exports around 66% of its production to over 100 countries around the world. Accordingly, the need to be internationally competitive is imperative, the Commission's focus on reducing unnecessary regulatory burden is essential to supporting a sustainable and competitive Agriculture sector in Australia.

Yours sincerely

Polly Bennett
Chief Executive Officer

TOPIC	RECOMMENDATION OR INFORMATION REQUEST	ALFA RESPONSE
<p>Land Use Regulation</p>	<p>Information Request 2.1 What are the advantages and disadvantages of ‘right to farm’ legislation? Are there any other measures that could improve the resolution of conflicts between agricultural and residential land uses?</p>	<ul style="list-style-type: none"> • ALFA is strongly supportive of clarification of existing use rights for farming operations. There is a growing tension between farm production systems, residential development and competing uses such as extractive industries, which has intensified the potential for conflict. • ALFA supports the need for State Governments, in conjunction with Local Government, to provide strong strategic guidance by undertaking regional agricultural land capability assessments and identifying appropriate areas for intensive agriculture in local planning policies. Strong monitoring, planning and zoning will increase clarity around Local & State development and provide the confidence and certainty required by industry and communities to manage and develop their assets. • ALFA believe that this should be managed at a state level to ensure consistency in decision making and to clarify responsibility. We also encourage the use of nationally consistent, uniform guidelines to inform these decisions such as the National Guidelines for Beef Cattle Feedlots in Australia. • To minimise conflicts between competing land uses ALFA support that buffer distances should be in place to separate intensive industry from residential dwellings to minimise the risk of conflict over expected amenities standards. However, feedlot separation distances cannot be addressed with a simple “one size fits all” approach. Separation distances will vary in every situation depending on topography, prevailing climatic factors, the nature of the feedlot development and the type of receptor in question. ALFA encourages recognised and proven approaches to separation such as recognised s-factor equations and odour modelling techniques. • If “Right to Farm” legislation was deemed necessary in the future to protect the basic right of farmers to undertake activities which may be deemed unsightly or an environmental nuisance by the population who have little or no understanding of agriculture but has a desire to live in a rural area, then it must

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		<p>allow farmers to go about their daily business without the need to defend their operations from nuisance claims or be impeded economically due to impositions from councils putting residents before industry.</p> <ul style="list-style-type: none"> • Resolution of Conflicts – A clear process be adopted at a Local Government Level (possibly guided by the State) to ensure that it is understood that impacts on neighbours must be outside measurable quantities. • Whilst landholders have a right to compensation for resource companies accessing their land, there is considerable challenge for landowners to have effective representation in the negotiation process and significant costs involved in the process which is borne by the landholder. ALFA agrees that there is an imbalance in the involuntary nature of the negotiations that favours resource companies. • A specific example is the make good provisions required for CSG development in Queensland. There remain fundamental flaws with existing requirements which must be remedied. Including but not limited to the following: <ul style="list-style-type: none"> • The unknown duration of the impacts must be taken into account, as the impacts may extend beyond the tenure of the CSG Company, and make good agreements must have provision to accommodate longer term impacts. • The trigger mechanism for make good provisions by tenure holders is fundamentally flawed; it is inadequate and requires review. The trigger for make good is based on the drop in water level of a water bore. Changes in bore quality or pressure are not considered triggers, and they need to be. Testing and monitoring all three elements are required, and be a provision of the Act, and future UWIR monitoring. • The hoops for a landowner to establish that the impairment caused by CSG activity in order to require the company to enter into a negotiation is vague and open to interpretation. It is considered virtually impossible to meet all the conditions that require a “make good” negotiation to be entered into. • CSG companies must make good bores in advance of the impairment and this needs to be a requirement before operations can commence. This

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		<p>poses a significant risk to the feedlot sector that is totally reliant on the water supply for the health and well being of their livestock.</p> <ul style="list-style-type: none"> • Current planning and zoning regulations is both complex in requirements and process, and challenging to interpret. ALFA supports the need for clearly communicated, consistent regulations that reduces duplicative processes and red tape. Policies, regulations and guidelines must be simply and effectively communicated for existing and new planning instruments. • There is a need for education programs at a Local Government level about the importance of agriculture to the immediate region.
Environmental Regulation	<p>Recommendation 3.3 The Australian, state and territory governments should review the way they engage with landholders about environmental regulations, and make necessary changes so that landholders are supported to understand the environmental regulations that affect them, and the actions required under those regulations. This would be facilitated by:</p> <ul style="list-style-type: none"> • recognising and recruiting the efforts and expertise of landholders and community-based natural resource management organisations • building the capability of, and landholders' trust in, environmental regulators. 	<ul style="list-style-type: none"> • ALFA supports this recommendation. • The need to build awareness and understanding of the vast myriad of environmental regulations imposed by the Commonwealth, State and local Governments is a significant issue and challenge. Effective communication of the requirements is essential to ensure compliance with requirements and fundamental to building trust between industry, governments and community. • To facilitate this outcome ALFA recommend that governments at all levels formally recognise participation in compliant industry assurance programs in the planning and environmental licensing process such as the National Feedlot Accreditation Scheme. This schemes targets and “talks” directly to the feedlot industry, and is independently owned and audited. This scheme provides a coordinated and comprehensive approach to the management of the production system across a range of regulatory requirements. • ALFA strongly supports the need for government to formally recognise compliant industry assurance programs and that they are adopted as the basis, at least, for state legislation. For example, ALFA supports the use of NFAS as the first layer of regulation, as it is in Queensland, whereby NFAS conducts annual auditing and compliance checking on behalf of relevant

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		<p>government departments. Another example is the Victorian <i>Department of Environment, Land, Water and Planning's</i> recognition of NFAS under the Livestock Management Act (2010), which includes a framework for recognising industry quality assurance programs, such as NFAS, as mechanisms for demonstrating standards such as for animal welfare and environmental requirements are met. This co regulatory approach has delivered improved performance and compliance from industry and provides effective mechanism for governments to engage with industry.</p>

On-farm regulation of water

Recommendation 4.1

The Australian Government should implement the findings of the Interagency Working Group on Commonwealth Water Information Provision to reduce duplicative and unnecessary water management information requirements imposed on farm businesses.

- ALFA supports the finding of the Commission that complexity and ongoing changes in water regulation contribute to the cumulative burden of regulation on farm businesses. However, the diversity of Australia’s river catchments makes streamlining and harmonising regulation difficult. More flexible governance arrangements may be needed to develop locally appropriate regulatory settings for accessing water.
- ALFA notes that the focus of interagency Working group recommendations referenced in the report was focussed on reducing reporting – related regulatory burden.
- The feedlot industry is reliant on the reliable supply of good quality water. The risk to animal health and welfare should quality supply be diminished or interrupted is potentially catastrophic. Priority must be given to all measures that ensure affordable ongoing continual supply to water and support the future growth and development of the industry. Current and future competing industry development should not be to the detriment of the beef industry’s growth plans. The holistic management of water given the interrelationships between the water systems and the regulations, policies and bodies that govern these relationships is key.
- The management of water in Australia is impacted by complex regulatory, policy and planning settings, governed and administered by a number of State agencies the Commonwealth and local governments. The Murray Darling Basin and Great Artesian Basin plans seek to inform the management of water.
- Given seasonal impacts such as drought on the supply of surface water, reliable supply of quality ground water is vital to the management of animal welfare and environmental mitigation in feedlots.
- The feedlot industry is reliant on high security licensed water. Administrative costs associated with water licensing are a significant cost item for the feedlot industry. Effort between the jurisdictions to harmonise regulation, reduce reporting, and facilitate access to information would assist in

TOPIC	RECOMMENDATION OR INFORMATION REQUEST	ALFA RESPONSE
		alleviating the burden. ALFA is aware that the Commission is exploring through other reviews the management of water.
Regulation of farm animal welfare	<p>Recommendation 5.1</p> <p>The Australian Government should take responsibility for ensuring that scientific principles guide the development of farm animal welfare standards. To do this, an independent body tasked with developing national standards and guidelines for farm animal welfare should be established.</p> <p>The body should be responsible for determining if new standards are required and, if so, for managing the regulatory impact assessment process for the proposed standards. It should include an animal science and community ethics advisory committee to provide independent evidence on animal welfare science and research on community values.</p>	<ul style="list-style-type: none"> • ALFA does not support the recommendation to establish a new, independent body tasked with developing national standards and guidelines for farm animal welfare. • ALFA supports that the current process of developing national animal welfare standards, managed by Animal Health Australia, be retained. • ALFA recommends that opportunities to enhance the rigour of the existing framework be identified to enable the standards development process to be better informed by community values. • ALFA supports that the national standards and guidelines be implemented by state and territory government with little or no variation, unless required to meet clearly defined local circumstances. • ALFA supports that where industry quality assurance programs exist, that have an independent, clear and transparent compliance framework, they are recognised as meeting state and territory compliance and enforcement functions.
	<p>Recommendation 5.2</p> <p>State and territory governments should review their monitoring and enforcement functions for</p>	<p>ALFA supports that:</p> <ul style="list-style-type: none"> • State and territory governments recognise industry quality assurance schemes as a means of achieving compliance with farm animal welfare standards where the scheme seeks to ensure compliance (at a minimum) with standards in law, and involves independent and transparent auditing arrangements. • An example is the Victorian <i>Department of Environment, Land, Water and Planning's</i> recognition of NFAS under the Livestock Management Act (2010), which includes a framework for recognising industry quality assurance programs, such as NFAS, as mechanisms for demonstrating standards such as for animal

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	<p>farm animal welfare and make necessary changes so that:</p> <ul style="list-style-type: none"> • there is separation between agriculture policy matters and farm animal welfare monitoring and enforcement functions • a transparent process is in place for publicly reporting on monitoring and enforcement activities • adequate resourcing is available to support an effective discharge of monitoring and enforcement activities. • State and territory governments should also consider recognising industry quality assurance schemes as a means of achieving compliance with farm animal welfare standards where the scheme seeks to ensure compliance (at a minimum) with standards in law, and involves independent and transparent auditing arrangements. 	<p>welfare are met. Another example, with respect to environmental management, is in Queensland, whereby NFAS conducts annual auditing and compliance checking on behalf of relevant government departments against relevant environmental legislation and regulations.</p> <ul style="list-style-type: none"> • This co-regulatory approach to monitoring and enforcement for those industries that have approved quality assurance programs in place will enable State and territory governments to divert already limited resourcing to support an effective discharge of monitoring and enforcement activities in other areas.
	<p>Information Request 5.1 The Commission is seeking feedback on:</p> <ul style="list-style-type: none"> • the most effective governance structure for an independent body tasked with assessing and developing standards and guidelines for farm animal welfare • what the body's responsibilities should include (and whether it should make 	<ul style="list-style-type: none"> • Should an independent body be established, ALFA recommends it report to the Commonwealth Minister of Agriculture, and comprise of representatives from industry, animal welfare groups, animal welfare and ethics scientists, government and the veterinary profession. • The body's responsibilities would include overseeing the development and consultation of national animal welfare standards and guidelines, management of the regulatory impact assessment development process and identification and commissioning of research to ensure standards development is informed by independent evidence on animal welfare science and community values. • Compliance monitoring and enforcement would remain a state and territory government responsibility and that where industry quality assurance programs

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	<p>decisions or recommendations and if the latter, to whom)</p> <ul style="list-style-type: none"> • what processes the body should use to inform and gauge community values on farm animal welfare • how such a body should be funded. 	<p>exist, that have an independent, clear and transparent compliance framework, they are recognised as meeting the compliance and enforcement functions.</p> <ul style="list-style-type: none"> • To maintain a level of independence the funding for this body will come from consolidated revenue and industry funding should not be used.
<p>Access to technologies and agricultural and veterinary chemicals</p>	<p>Recommendation 6.1 The New South Wales, South Australian, Western Australian, Tasmanian and Australian Capital Territory governments should remove their moratoria (prohibitions) on genetically modified crops. All state and territory governments should also repeal the legislation that imposes or gives them powers to impose moratoria on the cultivation of genetically modified organisms by 2018. The removal of the moratoria and repeal of the relevant legislation should be accompanied by the provision of accurate information about the risks and benefits to the Australian community from genetic modification technologies. State and territory governments, the Office of the Gene Technology Regulator and Food Standards Australia New Zealand should actively coordinate the provision of this information.</p>	<ul style="list-style-type: none"> • ALFA supports the ability for lot feeders to have access to any technological advancements and innovation that suits their production system, including the production and use of GM foodstuffs, and in doing so supports this recommendation.
	<p>Recommendation 6.2 The Australian Pesticides and Veterinary Medicines Authority should make greater use of international evidence in its assessments of agricultural and veterinary chemicals (including by placing greater reliance on assessments made</p>	<ul style="list-style-type: none"> • ALFA supports the recommendation that the Australian Pesticides and Veterinary Medicines Authority make greater use of international evidence in its assessments of agricultural and veterinary chemicals and strongly encourages the Australian Pesticides and Veterinary Medicines Authority expediting reforms to this effect.

TOPIC	RECOMMENDATION OR INFORMATION REQUEST	ALFA RESPONSE
	<p>by trusted comparable international regulators). Reforms currently underway in this area should be expedited</p>	<ul style="list-style-type: none"> • Whilst the use of overseas generated efficacy and safety data to facilitate Australian registration is encouraged ALFA strongly supports that this be accompanied by an Australian Trade Risk Assessment undertaken by the Australian Pesticides and Veterinary Medicines Authority. • The lack of access to next generation veterinary medicines is a major issue for the feedlot industry. The cost of registering agricultural and veterinary chemicals in Australia means that there is no economic return for specialised medicines and the industry misses out on more effective and lower cost solutions.
	<p>Recommendation 6.3 The Australian, state and territory governments should expedite the implementation of a national control-of-use regime for agricultural and veterinary chemicals (which includes increased harmonisation of off-label use provisions), with the aim of having the regime in place in all states and territories by the end of 2018.</p>	<ul style="list-style-type: none"> • ALFA supports this recommendation
	<p>Information Request 6.1 How well does the regulatory framework for technologies and agvet chemicals perform? Are the institutional arrangements and regulatory objectives underpinning the OGTR and APVMA appropriate and up to date? What improvements could be made?</p>	<ul style="list-style-type: none"> • ALFA is supportive of a risk based regulatory framework for the registration of agricultural and veterinary chemicals. However, the relatively low demand for volume sales coupled with high registration costs in Australia means that there are many products available internationally that manufacturers do not intend to register for use in Australia. • ALFA encourages government to develop policy which encourages investment in Australia from product manufacturers such as the use, by the APVMA, of international evidence in its risk based assessments. • Accordingly, ALFA welcomes the initiative by the Department of Agriculture and Water Resources to invest significantly in streamlining the approval of agricultural and veterinary chemicals with the aim of improving access to productivity

TOPIC	RECOMMENDATION OR INFORMATION REQUEST	ALFA RESPONSE
		enhancing chemicals, whilst using a risk based approach to ensuring key safety standards are maintained.

TOPIC	RECOMMENDATION OR INFORMATION REQUEST	ALFA RESPONSE
Biosecurity	<p><i>Information Request 7.1</i> Participants raised concerns about farm trespass, particularly as trespass can increase biosecurity risks. What strategies could be used to discourage farm trespass? Are existing laws for trespass sufficiently enforced in relation to farm trespass?</p>	<ul style="list-style-type: none"> • Since the new Biosecurity laws have come into effect, more responsibility for biosecurity is being placed at the door of the livestock farmer, yet there is insufficient legislative support to protect the farmer • Laws relating to trespass need to be uniform across the states to ensure they can be enforced across borders at a Federal level if necessary • Deliberate trespass becomes a biosecurity, security and possibly an animal welfare issue if livestock are infected by illness along with significant personal impacts on the families and staff of the targeted business. • Enforce compliance with the law • The adequacy and appropriateness of offences and penalties relevant to farm trespass by animal activists requires review • Government should encourage “prosecution where possible” to reflect the seriousness of the trespass crime • Reducing the perceived incentive for activists to commit the trespass would be supported by improved and coordinated stakeholder communication to increase consumer confidence in the animal health and welfare practices and the commitment to high animal welfare standards should be done.

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Transport	<p>Recommendation 8.1</p> <p>States and territories that are participating in the Heavy Vehicle National Law should increase the number of routes that are gazetted for heavy vehicle access. Permits should only be required in locations where there are significant risks to public safety or infrastructure that must be managed on a case-by-case basis.</p> <p>There are arrangements in South Australia to allow road users to propose and undertake road route assessments for gazettal, and in Queensland to fund road assessments and gazettals on both state and local roads. These arrangements should be considered for adoption in other jurisdictions or expansion in respective states.</p>	<ul style="list-style-type: none"> • ALFA supports this recommendation.
	<p>Recommendation 8.2</p> <p>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.</p>	<ul style="list-style-type: none"> • ALFA does NOT support this recommendation. The introduction of road user charges and creation of Road Funds will only force a lot of smaller owner drivers out of the market and large transport companies will simply increase freight rates charged to producers.

TOPIC	RECOMMENDATION OR INFORMATION REQUEST	ALFA RESPONSE
	<p>Recommendation 8.3 The National Heavy Vehicle Regulator, road managers, and relevant third parties (such as utilities and railway companies) should ensure that requirements for moving oversized agricultural machinery are proportionate to the risks involved. To achieve this they should, wherever possible, make greater use of gazettal notices or other exemptions for oversized agricultural machinery, and issue permits for oversized agricultural machinery that are valid for longer periods and/or for multiple journeys.</p>	<ul style="list-style-type: none"> • ALFA supports this recommendation. • Further reform is required under the Heavy Vehicle National Law and by state jurisdictions to align regulatory requirements for road access to actual risk. • Increased use of gazetted notices or other exemptions for the movement of oversized agricultural machinery will reduce regulatory burdens created by the existing permit system.
	<p>Recommendation 8.4 The Australian, state and territory governments should review the National Heavy Vehicle Regulator (NHVR) as part of the planned review of the national transport regulation reforms. The review should fully assess concerns over inefficiencies in heavy vehicle regulations, and identify ways in which new funds allocated following the abolition of the Road Safety Remuneration Tribunal could best be used by the NHVR to improve road safety in all states and territories.</p>	<ul style="list-style-type: none"> • ALFA supports this recommendation and believes that inefficiencies in heavy vehicle regulations would be significantly reduced with further harmonisation of state regulation including for driver fatigue laws, weight/mass restrictions, effluent spill, use of road trains and B doubles.

Recommendation 8.6 Arrangements to support the biofuel industry — including excise arrangements and ethanol mandates — deliver negligible environmental benefits and impose unnecessary costs on farmers and the community. The Australian, New South Wales and Queensland Governments should remove these arrangements by the end of 2018

- ALFA supports the recommendation.
- ALFA has opposed Ethanol mandates. And in previous submissions to Governments have supported the Commissions view that the support of “first generation” biofuels delivers negligible environmental benefit and arrangements in place by Australian, New South Wales and Queensland Government should be removed.
- ALFA supports the development of second generation sustainable biofuel industry, the current mandated arrangements supporting ethanol production stymie the investment and commercialisation of superior advanced and second generation ethanol production technologies as there is no preferential treatment provided.
 - The list of reasons why the proposed mandate is poor Government policy were outlined in the response to the Queensland 2015 Biofuels Mandate Discussion Paper supported by ALFA and can be briefly summarized as follows;
 - The arguments in opposition to mandates are large in number and have been backed up by numerous Government and other independent reports. Such arguments include that fact that mandates:
 - Lead to increased grain and molasses prices particularly during low production periods given it imposes an inflexible demand for grain and molasses which is disconnected to supply;
 - Lead to increased food prices for consumers given grain is on average the highest input cost in the production of beef, dairy, chicken, pork and eggs;
 - Assist the sugar cane and grain industries to the detriment of the more numerous producers in the beef, dairy, chicken, egg and pork industries. In particular, mandates impose an effective tax on otherwise competitive agriculture industries (i.e. a negative externality) for the benefit of the ethanol industry which is both an uncompetitive and unviable without such support and assistance;
 - Lead to a misallocation of resources towards a small number of ethanol producers in the state who have demonstrated over time to be unviable without such assistance;

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		<ul style="list-style-type: none"> ○ As with all 'infant industry' type assistance, mandates create ethanol producer complacency, foster inefficiency (rather than increased competitiveness), reliance on Government support and further 'rent seeking' behaviour into the future; ○ Mandates are inconsistent with Australia's World Trade Organisation stance in support for deregulation and reduced Government protection. Accordingly they jeopardize our efforts to seek positive trade liberalization outcomes in trade negotiations. ○ The taxpayer cost for such policies have been large whilst the benefits have been small and declining over time.

<p>Foreign investment in agriculture</p>	<p><i>Recommendation 12.1</i> 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).</p>	<ul style="list-style-type: none"> • ALFA supports the recommendation • ALFA did not support the lowering of the screening thresholds for foreign investment in agricultural land and agribusiness from the \$252 million to the \$15million for agricultural land. • Foreign investment is essential to the development of Australian agriculture. • Approximately 98% of feedlots in Australia are owned by farming families with the remaining 2% owned by vertically integrated processors. Whilst these processor owned feedlots are among the largest in Australia, they nevertheless represent only 22% of overall industry capacity, demonstrating the contribution to capacity by the more numerous but smaller feedlot operators. It also demonstrates the significant competition among lot feeders for feeder cattle in the market. • There are only 4% of feedlots in the country that are owned by foreign companies. This is verified by independent federal Government reports on this matter¹. However, they have a long history of such ownership (despite many changing hands since their initial development), and are often vertically integrated with foreign owned processors. Why the bigger feedlots in the sector are often foreign owned, is largely because feedlots are expensive to build, operate, purchase and upgrade with Australian investors often failing to have the sufficient capital required. Moreover, domestic banks have a conservative approach to lending (particularly in relation to agricultural investments) and accordingly, Australian corporations are often unable to access the capital necessary for feedlot investments. • A large proportion of feedlots in Australia would be valued above \$15 million. This is not only because of the high cost of feedlot infrastructure assets, but also because the purchase is almost always attached to the sale of the land on the property as a whole. This is because the surrounding land on the property provides the opportunity to supply the feedlot with inputs such as cattle, grain, silage and other infrastructure as well as a buffer distance to neighbours to mitigate any potential amenity issues. Therefore, the feedlot assets are inextricably linked to the land.
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TOPIC	RECOMMENDATION OR INFORMATION REQUEST	ALFA RESPONSE
		<ul style="list-style-type: none"> • Feedlots (particularly large ones) are high value investments with foreign companies often the only potential purchasers who have the necessary funding capacity to acquire such businesses. Decreasing the threshold to \$15 million has potentially deterred a significant proportion of buyers for such assets. This is not in the interest of the sector, nor the many others that rely on the sector for employment and a market for their products. • ALFA is supportive the establishment of a foreign ownership register as it will enable Australia to more accurately monitor the level of foreign ownership.

¹ Sanyal

, K (2014), *Foreign Investment in Australian Agriculture*, Parliamentary Library Research Paper Series, sourced from the internet 11/6/15
http://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp1314/ForeignInvest

TOPIC	RECOMMENDATION OR INFORMATION REQUEST	ALFA RESPONSE
	<p>Recommendation 12.2 The Australian Government should set application fees for foreign investment proposals at the level that recovers the costs incurred by the Foreign Investment Review Board in reviewing proposals, and should closely monitor the fees to ensure no over- or under-recovery of costs.</p>	<ul style="list-style-type: none"> ALFA is comfortable with the setting of application fees for proposals of foreign acquisition of agricultural land on a cost recovery basis, but is mindful that the fees should not pose a deterrent to foreign investment into Australian agriculture.
<p>The way forward</p>	<p>Information Request 14.1 The Commission is seeking feedback on possible strategies and governance arrangements for improving the incentives for policy makers to use regulatory impact assessment processes as an <i>analytical tool to support the quality of regulation making, rather than as a legitimising tool or compliance exercise</i></p>	<ul style="list-style-type: none"> The level of cumulative regulatory burden on farm businesses has a significant impact on the competitiveness of the agriculture sector. ALFA support the key points identified by the Commission that contribute to farm businesses when considering the “stock” of regulation affecting the sector. The removal of unnecessary red and green tape and ensuring necessary regulation is effective (but imposes the least possible costs for business) is a priority for the feedlot industry. The harmonisation of state Government regulation through adopting national legislation, where appropriate, would contribute significantly to decreasing regulatory burden. Australian agriculture operates on a global level yet we have to deal with the interstate inconsistencies on legislation. An assessment of the costs associated with inconsistent state legislation may assist in the harmonisation or development of a coordinated approach to such issues. ALFA would also support the development of a more risk based and outcomes approach to Government regulation development which would in some way go to mitigate disproportionate and overly prescriptive regulation.