



Regulation of Australian Agriculture – Productivity Commission Draft Report

Slow Food Australia draft response

Slow Food

The central objective of the Slow Food movement is the defence of food and our agricultural heritage, the protection of those in agriculture who work in harmony and care for the world resources, who produce food for consumption – not solely for profit! Our philosophy is good, clean and fair food for all. Our movement includes consumers, food processors, fishers, academics and researchers, restaurateurs and small farmers.

Introduction

The purpose of agriculture is the production of food and fibre for Australian customers and for export. Slow Food is surprised that the relationship between people (consumers) and food production, processing and consumption methods is lost or not addressed in this report. We feel that this is an opportunity to address some of the regulations that encourages the agricultural industry to opt for the path of homogenisation, standardisation and productivity gains and erodes biodiversity, food culture, heritage and taste, and imposes price as the main criteria for food choices.

We believe that one of the crucial challenges will be to feed the growing population with safe healthy nutritious food. In this context, regulations to reduce food waste in the whole supply chain will be seen as advantageous rather than looking at agriculture as an end unto itself.

We believe that it is important when reviewing and streamlining regulations that affect agriculture, that consideration be given to the role of small scale producers and what they offer as an alternative to the multinational agroindustry.

The weighing up of the public and private costs and benefits of any action can lead to conflicting outcomes for landowners and the community. The best outcome for the farmer would undoubtedly be for the taxpayer to accept any public costs of his actions (the so called externalities). From a public point of view, the best outcome might be to forbid the proposed action. Often a sensible compromise can be negotiated. The draft report appears too often to take the view that regulation is a bad thing per se and that the community has no proprietary interest over the landscape and wildlife on private land. Slow Food disagrees. Perhaps there needs to be a greater educational effort to explain this to farmers.

Draft recommendations, findings and information requests.

Land use regulation.

Slow Food broadly agrees that land management objectives should be achieved through land use regulation rather than leases. We would welcome the introduction of a more effective system of land use regulation to protect the public interest. To be worthwhile any new system should achieve public policy objectives at a lower cost.

Converting pastoral leases to freehold may facilitate efficient land use, but will it achieve public benefits or merely ignore public costs? Independent monitoring and assessment systems are not in place to report outcomes that are trusted by farmers or by the community.

The commission need to explain more clearly how the public interest in land is to be secured more cost effectively if their recommendations were implemented. We thus agree with the concept but do not accept that more efficient and effective methods have been outlined or that the case is effectively made in the report.

Environmental regulation

Slow Food agrees that the risk based and landscape scale approaches should be used more widely.

It is far from clear that market-based approaches to protect native vegetation and biodiversity are effective. These resources are not traded in any market place. They are issues that affect us all. That is one reason why we have governments, to protect the public interest and the interests of future generations. What evidence do you have that the market will protect us from the continuing loss of biodiversity?

As you set out in Chapter 3 some of the issues are extremely complex and the science is still weak, but we do not accept the concept that this is an excuse for ignoring environmental issues. We and many others believe that the Rio convention made the right decisions and that the 'precautionary principle' should be applied. After all, extinction is forever and we have one of the highest extinction rates in the OECD. That does not excuse bad regulation, rather it requires a look at regulation and other measures to achieve better environmental outcomes.

More effective application of the polluter pays principle might also help in balancing the interests of the community and landowners. Landowners that support environmental

conservation are contributing to the community, but those that farm intensively are dumping costs on the community which are not presently fully or even partially recovered.

Slow Food agrees that landowner's expertise should be harnessed and trust built through better education and more transparent information provision. The increasing length of food chains and the aggressive policies adopted by duopolistic retailers do not aid the situation for farmers or for consumers. Slow food invest much time and effort through its local groups in bringing producers and consumers together.

Animal welfare

Animals who provide food for human consumption are now considered a resource to be fattened in a few months, so that they can be sold at the cheapest possible price. The bond between the farmer, the land, the climate and the geographic location is now broken. Instead animals are part of a business model aimed solely at profit. The science of animal husbandry has seen the development of new breeds that are designed for "factory farming" with very little attention to the wellbeing of the animals. The conditions in which farmed animals are forced to live create serious risks for animal health, human health and for the planet.

Slow food believes that we must reduce the size and intensity of the farms, offer outdoor grazing and shelter for animals, provide the appropriate diet, increase biodiversity of the breeds, allow for farmers to have a relationship with their animals, provide slaughter houses that are close to the farms (smaller on farm operations to be permitted with appropriate regulations) to provide the best outcomes for the animals who produce food for all consumers.

We think the Commission has been inconsistent in its approach, this issue is an example of where transparency and the market would do a lot to correct matters. If production methods were more open to inspection by the public and if product information was more honest and straightforward, the market would secure adjustments in animal welfare standards. It is not consumers that are misinformed and need educating it is the producers and others in the food chain that need to be more open.

Access to technologies and agriculture and veterinary chemicals

Slow Food disagrees with your findings on GM crops. Much of the evidence for your statements is not in the public domain and most of the 'scientific evidence' has been obtained by persons employed by organisations that have a financial interest in the outcome. There is evidence that GM crops do generate environmental harm.

The successful coexistence of GM and non-GM crops has not been demonstrated here or elsewhere in the world. Indeed we have seen the bizarre case of a traditional and organic

farmer have weed infestations of GM plants appear in his crops and he has been unable to obtain legal redress. A clear breach of the polluter pays principle.

If farmers wish to introduce GM crops then we believe that four conditions need to be met:

1. All products that contain GM crops should be clearly labelled as such, so that consumers can make informed purchasing choices. That should include processed food in restaurants and other outlets.
2. If an animal product has involved the use of GM based animal feed, then this should also be reported to the consumers.
3. The growers of GM crops should bear the full financial costs of removing any plants/animals/fungi that escape from their properties on to public land or private non-GM properties. The polluter pays principle should be properly applied.
4. Independent publically funded long term research needs to be introduced to monitor these crops and products based on them and might conveniently be paid for by a levy on GM producers.

The logic of your argument that suggests that those that produce non-GMO products should bear the costs of informing customers seems perverse to us. The effects of GMOs on human health are still being debated by scientists and consumers have a right to know whether they are consuming these foods, particularly if they are concerned about their health and wellbeing.

Slow Food thinks that feeding the world through GMOs is a myth – Multinationals claim that GMOs will solve the problem of world hunger, however, since they began to be marketed two decades ago, the number of starving people in the world has in fact grown, just like the profits of the companies that produce the seeds. In countries like Argentina and Brazil, GM soy has swept away food crops such as beef, potatoes, corn, wheat and millet (essential to local daily diets) in order to provide alternative crops for profit. The majority of GM crops do not provide human food, but rather animal feed and biofuels. GMOs have also not increased productivity: data from the Department of Agriculture in the US shows that there has been no recorded increase in soya and corn yields since the introduction of GMOs.

In a nutshell, continued industry promises about the ability of GM crops to tackle the world's growing social problems are a myth: they have reduced biodiversity, polluted landscapes, threatened the future of small-scale farming, reduced the food security of the world's poorest people and called into question our food sovereignty. They have not fed the world, but rather concentrated profits and power into the hands of a few ruthless companies. They put at risk our right to choose what to cultivate and how. Slow Food believe that it is time to stop this big scam.

Biosecurity

Our interpretation of your request for information centred around trespass perfectly illustrates the transparency problem. Intensive producers do not want consumers to know

what they are doing. Farming livestock has become more and more intensive and the varieties of crops grown, has narrowed, so we now have vast acreages of a single cultivar, this increases biosecurity risks substantially. It is intensive farming that has created the biosecurity risk, not trespassers. The Commission seem to have ignored these issues. The planting of large areas bananas with the disease susceptible Cavendish variety is a good illustration of the problem.

Slow Food believes that encouraging farmers to retain a large and varied genetic pool for both crops and livestock enhances our long term food security. Many traditionally grown varieties and breeds have been chosen because they fit local conditions; they are products known to local consumers and are part of our culture.

Food Regulation

Slow Food strongly supported a mandatory system of country of origin labelling and is disappointed that the recently introduced regulations have not achieved this. Our commitment to good clean and fair food for everyone can only be delivered by much clearer information being made available to consumers. Where was it grown, what methods were used, when was it harvested, where was it processed, has it been frozen, has it been irradiated and the list goes on. Much of the present information given to consumers is at best uninformative and at worst misleading (Your table 9.1 neatly illustrates one of the problems facing consumers). For example, words like 'fresh' are freely used for produce that has no harvest date on the label and has sometimes been transported thousands of kilometres to reach the shop. Large retailers appear to have a vested interest in competing on price alone and obscuring origin, process and quality. This seriously depresses prices paid to farmers and puts small producers out of business.

We are very conscious that given the degree of processing and the length of the food chain it has become virtually impossible to represent all relevant product information on a label. It is for this reason that Slow Food believe that narrative labels (descriptive fact sheet) should be available to consumers and contain the necessary information. Such information can be displayed at point of sale in print form or electronically and we commend the few retailers that have commenced to adopt this approach. We attach the Slow Food template for a narrative label on vegetables as an example.

Small Producers

We are constantly coming across examples of regulations made in respect of large scale producers which place a disproportionate burden on small producers. For example, a poultry farmer with a 1000 bird flock is treated by planners in the same way as a farmer with 100,000 birds. The farmer who is making a genuine effort to produce free range eggs at 500 birds per hectare faces the same regulation as the free range (sic) producer with 10,000 birds per hectare. Beef and sheep farmers face similar issues. There are fewer and fewer

local abattoirs willing to process their stock. Mobile abattoirs appear to be banned in Australia. Slow Food believes that the Commission should specifically propose regulations that are distinct and appropriate for small farmers and processors.

Conclusions

The perspective of Slow Food is fashioned by the mixture of consumers, food professionals, and the many small and medium sized farm and food businesses that are our members. These are a mix of traditional producers and innovative introducers of new crops and products. What we all hold in common is a belief in good clean and fair food; a belief in food diversity, quality and value for money, rather than cheap food.

Over the past 30 years the food industry has distanced producers from consumers, supply chains have got longer and economic power has concentrated in the hands of a very small number of major retailers. This has disadvantaged small producers and consumers and has greatly reduced the quality and variety of local foods available. As consumers we seldom get to meet producers. Producers seldom meet their real customers. The market place is full of miss-information. Any economist can tell you that markets only work really well when there are many producers and many consumers and perfect market information. That is not the case in the food industry in Australia.

Slow Food has been involved with biodiversity for over 30 years, focusing its attention on wild food species, domestic species of food and the food diversity of processed foods (developed to preserve food and the knowledge handed down from generation to generation). The wealth and variety of biodiversity allows nature to survive by adapting to environmental change, climate change and disease. Down the millennia, about 10,000 species have been used for human nutrition. But today 90% of human food comes from 120 species and only 12 plant species and 5 animal breeds provide more than 70% of all human nutrition. We need to change this and support the small farmers who are the main protectors of our food heritage for the future and who contribute to the protection of the environment through sustainable farming practices.

The PC draft report argues for economic, social and environmental values to be considered in tandem, but it fails to do so. It seems designed around a very narrow view of markets that will put small farmers and food processors out of business, reduce the size and viability of local communities and further damage the environment. One person's productivity gain is another person's redundancy.

The commission report as it now stands will do nothing to reduce consumer producer mistrust, nothing to reduce environmental damage, nothing to stop rural communities dying, it will make matters worse.

This is not the vision of Rural Australia that Slow Food wants to see, nor is it the vision that most rural politicians want to see. Slow Food urge the Commission to address these wider problems in their final report.

Annex – Narrative Label for Vegetables, Fruit and Legumes

Variety

Describe the main characteristics of the variety or ecotype grown, including information on its history or interesting facts about its production.

Example:

The Vesuvio Piennolo cherry tomato has an oval shape, small size and is characterized by longitudinal grooves (ribs) and a small pointed tip. Its name comes from an ancient practice of preservation, called “alpiennolo,” which involves tying the stems to form clusters, called “schiocche,” and hanging them from the walls or ceiling of well-ventilated areas.

Territory

Point out where it is produced (the province, the country or even the region, to indicate precisely where the growing is done). If it is significant, indicate the altitude. It is also useful to specify the pedoclimatic characteristics of the production area, but only those that give the product particularly unique, identifying or organoleptic characteristics.

Example:

The farm and its fields that grow chickpeas are found in the town of Cicerale (Campania, Italy), in the Cilento National Park, Diano and Alburni Valley. The calcareous soil and the warm, but not humid, climate give this legume a delicate flavour and high nutritional quality. The Romans first planted it in this area and christened it “terra quae cicera alit” (land that nourishes chickpeas), as is seen in the coat of arms of the town which depicts a chickpea plant.

Cultivation

Indicate how much land is cultivated and where the seeds come from: if they are bought (and where) or if they are saved by the farmers themselves. Specify the period in which the seeds are planted and the planting technique. Indicate how the soil is worked and with what kinds of systems or equipment, focusing on any interesting elements: use of poles, crop rotation (and which kinds). Explain the specific types of irrigation used (drip, overhead, etc.) and if necessary, types of weeding employed (mechanical, chemical, etc.). Describe how and with what the land is fertilized. Indicate if other treatments for disease and pest control are used and which ones.

Example:

The farm grows around 5 hectares (about 12 acres) of Nizza Monferrato hunchback cardoon. The seeds, chosen and saved by the farmer, are sown in rows in May. The soil is not fertilized nor irrigated and the cardoons do not need to be treated for disease control. Weeds that

grow at the beginning of the season are removed manually and, later, are overcome by the strong vegetative growth of the cardoon. In September, between the ribs and the leaves, jute string is used to tie the plants. The cardoons are covered with soil; by doing this, they lose their chlorophyll and become white. Attempting to reach the light of the sun, they swell and curve, becoming characteristically hunchback.

Harvest and storage

Describe in which period harvest takes place and by which method. Note cleaning, storage and packaging techniques.

Example:

The pods are harvested by hand starting at the end of October, when they have dried out as much as possible on the plant. They are brought to a well-ventilated area, spread out on the ground on a cottoncloth, and left for about 10 days. The beans are then mechanically removed from the pods and left on the ground again for a few days to dry out completely. To protect against insects, which could appear during storage, the seeds are put in the freezer for a few days before being sold.

... if the narrative label describes a processed plant, include this additional paragraph:

Processing

Give a description of the processing of the plant, specifying the ingredients used and their origins. If processing is done in an external location, indicate the name of the processing company and where it is located.

Example:

The tomatoes are cleaned and blanched in water for about 5 minutes. The tomato pulp, separated from the seeds and from the skin using a strainer, is then bottled.

Tips for use or storage

How and where to best store the product and how to cook it or prepare it for cooking.

Example:

Once opened, store the bag in a dry and well-ventilated place, or: Soak the lentils for 8 hours before cooking them.