



Regulation of Agriculture

Submission to the Productivity Commission

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University of Southern Queensland

USQ is a regional university with strong connections to the local and regional community. The University is based in Toowoomba with additional campuses at Springfield, Ipswich and the Queensland College of Wine Tourism, Stanthorpe. USQ currently has 28,000 students and has forged a reputation as one of Australia's leading providers of on-campus and online (distance) education programs in Australia.

USQ's research is focused, engaged with industry and communities, and informed by regional and national priorities. The University is committed to establishing its position among the world's leading research bodies in the broad research areas of: agriculture and the environment, and the emerging areas of regional systems and digital futures.

USQ has a long history of producing crop and plant science graduates for the agricultural sector and it is Australia's only provider of Agricultural Engineering degrees and it is Queensland's only provider of wine science programs at the university level.

Toowoomba Region

The Toowoomba region has a vibrant and diversified economy, with mining, education, healthcare and construction as key pillars of the economy. However agriculture has been a mainstay of the regional economy for over 150 years and the Toowoomba region is now Australia's most productive agricultural region with an annual gross value of agricultural production in excess of \$720M. The agriculture, forestry and fishing category is still the largest employing industry in the region employing 20% of the population with retail employing 10%, healthcare 9%, construction nearly 8% and mining just 3%.

The region is well served by a diversified agricultural base with key industries including beef, grain, dairy, cotton, horticulture, poultry and pork and various businesses and industries that support these pursuits.

Recent and ongoing investment in the region has been extraordinary (with over \$11B committed over about a 3 year period from all sources) with a new internationally capable airport completed in 2014, at a cost of over \$500M.

Brisbane West Wellcamp Airport, located 27km west of Toowoomba, is a privately owned public airport designed to cater for large aircraft, up to 747 size, to land and take off fully loaded. Consisting of a 45 metre wide, 2.87 kilometre long runway the airport has a large range of regular passenger services and charter flights, including direct flights to Sydney, Melbourne and Cairns via Qantaslink, Regional Express and Airnorth.

Additionally, there are plans to develop a perishables hub at this site, which would facilitate live and fresh products to be airfreighted to international markets. Through partnerships and collaboration, the region is very focused on value adding and developing exports.

A major new road project is the Toowoomba Second Range Crossing - a 41km four lane highway connecting the Eastern Warrego Highway to the New England, Western Warrego and Gore highways, scheduled for completion in 2019. This project will reduce travel time between the production areas to the North, West and South of Toowoomba, and the population centres and ports to the East, by up to 40 minutes, reducing freight costs and travel time to the benefit of all industries.

With the airport and highway bypass, other transport network upgrades and new retail developments, including a major shopping complex, the total development spend (from all sources) in the Toowoomba region over a three year period is more than \$11 Billion. With this level of investment and confidence in the region, taxpayers, investors, businesses and consumers all expect a good return on this investment.

Government Regulation

Australia has a poor ranking on the burden of government regulation within the World Economic Forum's (WEF) assessment of national competitiveness. In the 2015-2016 Report, Australia ranked 80th out of 140 countries for burden of Government regulation. This relatively poor ranking suggests that the correct balance is not being achieved at present. The WEF Report also identified restrictive labour regulations, complexity of tax regulations and inefficient Government bureaucracy as key problems for doing business in Australia.

A degree of regulation in agriculture is important to maintain minimum standards for society and the environment and enable market access. However, regulation in Australian agriculture as it currently stands is unduly complicated, duplicative and overly burdensome. As a result, we have a situation where agricultural productivity is being restricted by the compounding effects of regulation.

USQ welcomes this Productivity Commission inquiry into Regulation in Agriculture as an important step towards reducing the regulatory burden in agriculture.

In seeking to reduce the burden of regulation, a stronger commitment by governments at all levels to the principles and practices of best practice regulation would be beneficial. This might include:

- Improving harmonisation between jurisdictions (local, state, national, international).
- Evidence-based objective regulation, not opinion-poll or politically-driven decisions.
- Removal of redundant, duplicative or conflicting regulation.
- Risk-proportionate regulation (eg. for low risk issues, self-assessment with random compliance auditing is a preferred approach).
- Outcome-focused regulations – not government process-focused regulations.
- Evaluating and regularly reviewing existing regulations for cost / benefit and achievement of clearly defined policy objectives to ensure maximum effectiveness.

Agriculture in Context

Agriculture is a key foundation of the Australian economy. In 2015-16, Australian farm production was forecast to be worth \$60.3 billion. While farm-based agriculture directly contributes two percent to Australia's gross domestic product (GDP), the sector also underpins Australia's largest manufacturing industries - food, beverage and tobacco processing - which added \$25 billion to the economy in 2013-14 (25 percent of manufacturing GDP). As noted in the recent Australian Government Agriculture Competitiveness White Paper, in the face of a slowing mining construction sector, fostering growth in export sectors such as agriculture is an important national economic strategy.

Agriculture is an important source of employment in Australia. More than 307,000 Australians are directly employed in agriculture, most of whom live in, and maintain the viability of, rural communities. When agriculture-dependent sectors, such as food processing and distribution, are considered, Australian agriculture can be seen to provide the basis for the employment of more than 1.6 million Australians.

Agriculture is also an important feature of the Australian landscape. Fifty-three percent of Australia's total land area is managed by agricultural businesses, making Australian farmers important contributors to environmental management in Australia.

Transport

Transport regulations are a major issue for farmers and businesses alike, that both support agriculture, but also those further along the value chain, that are often trying to value-add and export our agricultural and food products.

Farmers are looking for flexible, sensible approaches to farm machinery regulations that do not unduly hinder efficient farming operations. In particular, regulations on oversize equipment, secure loads, access and registration need to be harmonised across the states to allow farmers to transport their produce and move equipment across state borders with ease. Such harmonisation fits well within COAG's agenda to co-operatively reduce regulatory burden through streamlining regulatory requirements across different governments.

The horticulture industry in our region predominantly produces perishable product which makes access to appropriate infrastructure and transport options vital to its success. Transport costs make up a significant proportion of farmers' costs of production; commonly around 20%. Horticultural freight varies from bulk packed pumpkins and melons to highly perishable, delicate products such as salad greens and berries. Critical freight needs include the requirement for rapid and efficient transport, maintenance of the cool chain, and minimisation of handling and damage. In horticulture up to 80% of produce requires refrigerated trucks.

The potential to increase the amount of product transported by rail from rural and regional Australia is very sector-specific. Rail works well in some circumstances, but it is impractical for other industries

or businesses due to the length of time it takes, the cost of getting goods on and off trains, and the physical limitations of the nation's current rail infrastructure.

The aim of harmonisation has been to remove differences between the heavy vehicle road transport laws operating in each state and territory. Such differences have made it difficult for producers to navigate the rules and comply with inconsistent jurisdictional requirements. The establishment of the Heavy Vehicle National Law (HVNL) and a national regulator should in theory reduce the compliance burden for business, increase industry international competitiveness, and make it easier for businesses to operate across state and territory borders.

However, a number of states, such as NSW, have introduced variations to the national model. This defies the point of harmonisation. For example, operators from NSW that choose to trade interstate will continue to face the paperwork juggle to ensure that compliance with both state and national laws are met. We believe more effort by governments is required to ensure seamless consistency between states on transport and other matters.

Maximum load restrictions are also a significant issue for many growers and differences in maximum load restrictions between states have a real impact on the efficiency of transport through wasted container space. For example NSW has a mass management accreditation scheme which allows growers to load 65 tonnes gross weight on a B-double transport and 43 tonnes on a single trailer. In Victoria the maximum weights are 68.5 tonnes on a B-double (68 tonnes in Qld) and 46 tonnes on a single trailer (45.5 in Qld).

There has tended to be more vocal feedback from farmers on transport issues than many of the other regulatory burdens. Many comments related to regulations on oversize machinery and securing loads, with comments stating that the regulations are too onerous and that there are unworkable inconsistencies in regulations between states that make it difficult to transport produce or oversized machinery across state borders. In particular, growers have identified that gazetted roads are often problematic, especially when they are not gazetted for the final few kilometres into a storage provider's facility, with some farmers being fined by zealous enforcement officers in that space. Many comments also referred to difficulties in registering farm tractors and machinery and obtaining railway crossing permits for oversize equipment. A selection of relevant farmer comments is provided below.

"New regulations for trucks in Queensland regarding weights and widths mean previously legal trucks and trailers are now illegal"

"Movement of agricultural machinery in agricultural areas: too much red tape to move short distances along or across minor roads in farming areas."

"Need uniform laws between states regarding oversize loads."

"Trucking regulations from state to state are ridiculous and inefficient. We need national rules."

We have heard of several cases where growers have made applications for permits to move their oversized equipment who have waited many weeks, sometimes months, to receive a permit. Agricultural producers face unnecessary costs associated with waiting for these permits, such as

costs to delayed production and the additional time and energy used in following up applications that should have been processed promptly.

Alternatively, they are faced with the risk of operating without a permit due to the serious threat of losing a crop if it cannot be harvested prior to impending adverse weather such as a significant rainfall event.

Recommendations

- Encourage the implementation of truly national heavy vehicle laws without state variations that impose unnecessary burdens on producers.
- Suggest an independent review to be undertaken of the National Heavy Vehicle Regulator, and more broadly the current situation of road and transport regulations in Australia with the view to streamlining regulatory requirements (e.g. through uniform wide load laws) and improving the ease of compliance.
- Review and harmonise restrictions affecting the use of oversized vehicles.
- Recognise and eliminate costly registration fee and charge anomalies that do not recognise the type of agricultural transport work being undertaken.

Duplication by Government Departments

Some growers have raised concerns that the quantity of surveys they are being requested to complete for government are unreasonable in both number and the time required to complete each properly. We note one example that was brought to our attention, where a farm business had received several similar requests for information in a relatively short time-frame, covering specific details of operations including financial information. The farmer estimated that a full day was needed to complete each of these surveys.

A common complaint from farmers is the inability of governments to share information internally, and across jurisdictional boundaries. Even within agencies, farmers and industry representative bodies have to provide the same data numerous times to various bureaucratic departments. Farmers are always looking to ensure the data is collected in an efficient manner and only collected when it serves a valuable purpose.

Recommendations

- Government agencies work collaboratively to share information internally and reduce the collection burden on farmers.
- Data collection agencies should improve consultation with industry to explain the information they are seeking (& how it will be used), and also take advice on the best approach to obtain the data.

Biotechnology

A substantial academic literature base has emerged on the environmental and health aspects of genetically modified (GM) crops over the past two decades since they were commercialised internationally. This literature demonstrates that many of the risks perceived during the early stages of GM crop commercialisation have not been realised. For example, in regard to consumer health risks, literature reviews of long-term, multigenerational animal feeding trials and data collected from 1983 through to 2011 confirm that there is no significant difference in the safety or nutritional value of GM food or the animal products of livestock fed GM feedstuffs compared with non-GM equivalents.

In regard to environmental risks, a *Nature* literature review found that there was “no compelling scientific arguments to suggest that GM crops are innately different from non-GM crops” in regard to effects on the environment, including invasiveness, and that the risk of transgenic DNA passing into nature and causing environmental damage is negligible.

In addition, there is strong evidence to suggest that adoption of GM crops has benefited the environment and biodiversity by associated reductions in pesticide use and increased adoption of conservation tillage, which both contribute to a reduction in greenhouse gas emissions, as well as associated adoption of less toxic herbicides and increased yields which reduce the need to expand agricultural land into areas that would otherwise harbor biodiversity and deliver valuable ecosystem services in order to meet the increasing food demands of the growing global population.

Regulation of GM technology is an ongoing issue for the Australian agricultural industries. While the Office of the Gene Technology Regulator (OGTR) provides national regulatory oversight of GM crop trials and commercialisation, state and territory governments contribute additional layers of inconsistent and, in some cases, unjustified regulation to Australia’s GM regulatory framework.

Recommendation

- South Australia and Tasmania should review and justify their respective moratoria on GM crops, acknowledging the scientific consensus on associated risk and the proven capacity of the Australian grains industry to self-manage market access and supply chain segregation, thereby giving farmers choice to grow GM or non-GM products as the market demands.
- GM regulation should be considered by CoAG as an area for cross-governmental collaboration with the view to establishing a nationally consistent, scientifically grounded regulatory framework.

Horticulture

Expanding urban centres pose challenges for horticultural and agricultural enterprises operating near peri-urban areas. Horticultural enterprises are often located close to urban areas or regional centres

for better access to packing facilities, transport infrastructure and labour. In many case the farms were there first but regional councils have often allowed urban development adjacent to rural production areas. There is a need to maintain focus on this issue in the context of rapid population growth, conflicts between neighbours in urban fringe areas, minerals development, climate change and an increased awareness of the need to protect food security.

Recommendations

- That development assessment and approval processes recognise the need for agriculture and horticulture to locate in peri-urban areas.
- Review opportunities to standardise state and local government regulation affecting agriculture and horticulture.

Ag & Veterinary Chemicals

USQ strongly supports the APVMA's current regulatory objective of ensuring that risks to human health, welfare of animals and trade from Agvet chemical use are kept within acceptable limits while facilitating user access to appropriate products.

However, Australia's chemical registration system is still too slow, complex and expensive, so that growers are being left without cost-effective alternatives to manage pests and diseases. There needs to be a major review and possible overhaul of our current system to improve chemical access.

Agvet chemical companies have little or no incentive to invest in new chemistry for Australian conditions – our relative market is just too small. It costs as much to register a product in Australia as it does in the USA and our market is one sixth of the size. Consequently, there is clear market failure in the current Agvet chemical regulation process and the minor use permit system.

Agricultural industries also have major issues with state government zoning regulations targeting spray drift. The issue is relevant to peri-urban areas and is a direct result of urban encroachment on established agricultural production. Spray drift buffers imposed on agriculture by state regulators and enforced by councils are overly cautious and impose major costs on growers. Growers are forced to sacrifice significant production areas to maintain regulated no-spray buffers. Mandatory buffers are imposed on the basis of limited or inappropriate science (e.g. broadacre research used to develop tree crop recommendations), the use of redundant technology (e.g. not recognising non-drift nozzles) and assuming limited or no grower training.

Recommendations

- APVMA need to increase international partnerships in agvet chemical co-regulation and look for efficiencies and incentives for agvet chemical investment in Australia.
- Review of currently registered agvet chemicals should include consideration of their potential role in managing a major exotic pest incursion

- Ensure spray drift regulations are based on science, current technology and contemporary grower education standards.

Water

Water and its regulation is a major issue for all farmers. USQ is aware of some of the other organisations that are making submissions in this area, who are much closer to the specific issues, so we will defer to their submission, other than to encourage -

- Increased coordination between governments to ensure the regulation of irrigation water produces efficient outcomes (e.g. minimise conflict between State and Commonwealth environmental goals).
- Continuation of the Commonwealth Government's commitment to funding water infrastructure upgrades.
- The Federal Government has flagged new water infrastructure (especially new dam options) and this is encouraged.
- Ensure adequate funding and resources for the implementation of the Murray Darling Basin Plan which will improve the water security of growers and give them confidence to invest in the future.
- Increase funding for water-use efficiency programs in growing regions outside the Murray Darling Basin, in addition to those already targeted within the MDBA.

Pests

Flying fox and native bird protection – we recognise that regulation is required to ensure survival of species and habitats but compromises need to be made to ensure the ongoing viability of fruit and vegetable growers.

Recommendations

- That environmental protection approvals, incorporating local, state and Commonwealth regulations, work in a coordinated way to avoid current long delays and missed opportunities
- Regulations aimed at protecting native species in forested areas allow for potential compensation to offset business threatening socio-economic impacts

Fruit Fly is a primary issue for countries undertaking risk assessments on many fresh fruits and some vegetable exports from Australia. However some of the protocols imposed by overseas markets on growers to manage the fruit fly risk are often difficult: treatments such as methyl bromide can damage the produce, while treatments such as cold disinfestation for 18 to 21 days are unsuitable for highly perishable products like berries.

Restrictions on key control chemicals have exacerbated access issues. Industry has responded to these difficulties through the National Fruit Fly Strategy and is confident of long term solutions based on sterile insect technology and area freedom.

Inconsistencies across State and Commonwealth legislation and regulations inevitably create inefficiencies which raise costs to growers, packers and exporters who already struggle internationally because of our high wage cost structure. Between states there are separate phytosanitary verification processes required for Western Australia and Tasmania.

Distrust amongst authorities from different states is not helpful. For example, inspectors from one state, not accepting inspection and verification from another state, and insisting on personal visits are wasteful and un-necessary.

This lack of national consistency in approach to pest risk reviews results in confusion and occasionally rejection of product.

The establishment of a single, nationally accepted risk assessment process upon which all national and state and territory plant biosecurity regulations are based is vital to ensure there is a consistent, scientifically sound, transparent process for the assessment of risk.

Recommendations

- Review and harmonise legislation and regulation relating to fruit fly suspension zones in order to provide a consistent and credible position for export market access negotiations;
- Where pests of concern cross a number of domestic jurisdictions, the Commonwealth Government needs to ensure best practice approaches are promoted and common risk assessment frameworks are applied.

Interstate Trade

– Harmonisation of Biosecurity and Quarantine Regulations

We believe that domestic trade barriers should be reviewed, with a number of impediments hampering the trade of products (especially horticulture) across state and territory borders:

There is a lack of recognition for industry accreditation of phytosanitary or biosecurity risk management practices and verification certificates.

The lack of country-wide harmonisation in state trade codes adds red-tape to businesses that wish to trade. Initiatives in the eastern seaboard states need to be replicated in Western Australia and Tasmania.

Recommendations

- Reduce costs of inter-state movement of horticultural products by standardising and streamlining the biosecurity and quarantine regulations of each state and territory and recognising industry biosecurity accreditation
- Harmonise state trade codes.

Food Safety Standards

We note that the horticulture industry strongly supports the February 2014 FSANZ view that horticulture does not need to be included within the Primary Production and Processing Standard which establishes regulatory safety standards and traceability for primary producers of very high risk products such as seafood, meat, dairy and eggs.

Despite this, there are still too many quality assurance food safety schemes operating within horticultural and some agricultural industries, and compliance has become one of the most expensive overheads incurred by growers. In the past farmers often had one annual audit and certification. But as direct sales have increased, retailers have imposed their own individual schemes, meaning additional standards and requirements and additional audits. Even more hurdles are added for those farmers who grow for export.

Obviously the myriad of schemes places a massive administrative and cost burden on the sector. Some growers have reported audits in peak periods as often as every three weeks and that the number and extent of audits, in addition to high wage costs, significantly inhibits exports.

We are aware of and support the on-going Horticulture Innovation Australia (HIAL) initiative and the AFGC initiative to achieve harmonisation between the quality assurance food safety programs required by Australian retailers and the food service sector. Apparently these projects are nearing completion and are likely to lead to an annual cost saving for growers and producers, conservatively estimated at \$40.3 million per year.

Recommendations

- The horticulture sector continue to operate under industry operated food safety quality assurance schemes without the imposition of the Primary Production and Processing Standard;
- Government support the work of industry, supermarkets and the supply chain, under the auspices of Horticulture Innovation Australia (HIAL) & the AFGC, to establish an industry-harmonised standard that frees growers from the plethora of other duplicative systems.

Food Labelling

USQ welcomes the Government's move to improve the country of origin labelling laws to better assist consumers to make informed decisions about the source of the fresh and processed foods they purchase. USQ also welcomes the proposed new logo and bar charts for products where the significant ingredients were grown in Australia.

Recommendations

- Simplification of the current country-of-origin system. This system should be mandatory and enable consumers to easily identify the source (origin) of the key ingredients
- Water used to reconstitute foods or juices be treated as being the same origin as the food or juice.
- Unpackaged fresh food is required to identify the country-of-origin where the food was grown.

Competition Regulation

Two Supermarket Chains Dominate Grocery Retailing

The horticulture sector consists of large numbers of small business operations at the farm level. Concentration significantly increases further up the supply chain. For example, in the grocery sector Woolworths and Coles own a combined 80% of supermarket outlets. The Roy Morgan Supermarket Currency Report of 2012 identified that Coles and Woolworths in 2011 had 45.5% of the market in fresh fruit and vegetable sales. This high level of concentration leads to imbalances in negotiating power between farmers and others in the supply chain and puts farm profitability at risk. This imbalance also leads to other “misuses” of market power such as wanting to audit all employment records for “ethical employment”.

USQ supports the Government’s Agricultural Competitiveness White Paper announcement that \$11.4 million will be spent to boost the Australian Competition and Consumer Commission to engage more effectively with the agriculture sector and encourage fairer trading. However, we do not believe that emphasis should be placed upon “strengthening competition in agricultural supply chains”. Suppliers, be they growers, packers, or wholesalers, already vigorously compete to supply the retailers. Rather, effort should also be focussed on improving the transparency and good faith dealing by retailers.

The Weekly Times investigated the returns to fresh food producers as a percentage of retail prices. The article (James Wagstaff, April 23, 2014) stated that “horticulture producers were among the hardest hit, with oranges receiving just 8% and potato growers 17% of the final retail price.” Whilst supply chain costs are high and often complicated, returns to growers are affected by the intense downward pricing pressures being applied by supermarkets.

Growers costs of production have grown with labour and energy charges and other input costs increasing, but products in the supermarkets (which account for the great majority of sales) have remained sensitive to price.

Recommendations

- The Australian Food and Grocery Council’s (AFGC) Food and Grocery Industry Code of Conduct is an excellent initiative and identified weaknesses in the existing wholesale code, and addresses unconscionable conduct due to pressure on suppliers by food retailers. This should be backed by

a strong enforcement framework for the Food and Grocery Code, including a Grocery Industry Ombudsman and conciliation or arbitration provisions for dispute resolution.

Investment

USQ recognises that foreign investment provides greater availability of capital to invest in the upgrade of on-farm and supply chain facilities. Foreign companies operating in Australia can often form better direct links between growers in Australia and the importers / retailers from their home country. A better understanding of the overseas customer also enables them to focus on delivering product that will meet consumer needs. Additionally, foreign investment also has the potential to improve export market access and the commercial viability of protocols through links between the foreign investor and officials or key influencers in the home country.

Nevertheless, USQ also recognises that foreign investment is an issue of concern for many growers (and many Australians). After discussions and debate following very recent decisions we propose that full transparency of foreign ownership be required for agricultural land and irrigation water ownership. Regulations are therefore required to establish a register of land and irrigation water ownership.

Recommendations

- Full transparency of foreign ownership be required for agricultural land and irrigation water ownership.
- Australia should have an accurate and up to date register of foreign owned farm land and irrigation water;

Use of Labour

Labour is a significant cost of production for all agricultural industries. However, horticulture is the most labour intensive of the agricultural industries. Horticulture is Australia's second-largest and the fastest growing industry in agriculture, with some 30,000 businesses nationally, and a farm gate value of \$10 billion. The industry is the largest agricultural employer in Australia employing around one-third of Australia's total agriculture workforce. It is therefore a key employer across regional Australia.

Labour costs commonly account for more than 50% of a horticulture business's costs of production. Australia's labour costs are amongst the highest in the world and certainly the highest in the Asia-Pacific region.

The Horticultural Award 2010 provides for a minimum hourly rate of \$17.29 per hour plus superannuation for the lowest level unskilled worker (Level 1- full or part-time), and \$21.61 per hour plus superannuation for the equivalent casual employee. The Award means that Australian horticulture is uncompetitive by international standards. For example, Australian apple growers must pay an apple picker (usually a casual backpacker) a minimum of \$23.66 per hour. This compares with

New Zealand where each picker earns AUD\$15.17 per hour and Chile where workers are paid an average of AUD\$7.08 per hour during harvest.

The high wage rates mean that Australia no longer enjoys the natural competitive advantage in agriculture as it once did. Australian fresh produce finds it difficult to compete in many international markets, with supplies primarily targeted at the premium end consumer. For many horticultural commodities the export strategy relies on Australia's image of producing "clean, green, safe" fresh produce, varieties with superior quality and a seasonal window that immediately precedes or follows the supply period of alternate and much cheaper southern hemisphere producers. These factors can be expected to be eroded over time and Australian horticultural growers will need to develop new niche markets or provide existing overseas markets with new reasons to retain their custom.

Alternatively, Australian growers will need to find ways to reduce their costs of production, particularly labour which accounts for more than 50% of costs for many horticultural commodities. Mechanisation, automation and robotics to replace labour will play a key role but advances in this area and widespread adoption is some years away. The focus of growers now then is to reduce wage bills and associated on-costs.

Add to this Australia's Occupational Health & Safety (OH&S) regulations, again not standardised, all adding to make Australia that much more uncompetitive in the export space and holding its own against imports.

Gains in this area can be made by:

- Providing greater flexibility in Awards and Removing the Use of Penalty Rates.
- Reducing red tape and high costs associated with engaging overseas workers.
- Reinstate Tax Free Thresholds for Backpackers.
- Review Superannuation Payments to Backpackers.
- Review Superannuation Thresholds and Contributions to a Single Fund.
- Improve access to Skilled and Semi-Skilled Migrants.
- Visa Checking Responsibilities
- Streamlined Approved Employer Status and Removal of Labour Market Testing.
- Improving oversight of Labour Hire Firms (ideally a Commonwealth Government registration system).
- Removal of duplications in OHS regulations.

Recommendations

- Government review modern awards for their relevance to agriculture and redesign in such a way as to better recognise the 'out of hours' nature of agricultural production.

- Refine the industrial relations framework to deliver an affordable and flexible system for business owners and fair pay and conditions for agriculture workers.
- Allow for enhanced flexibility in awards and agreements to accommodate the specific characteristics of agricultural industries, which are subject to diverse nature and crop conditions.
- Protect the agricultural industries from an expansion of penalty rates and/or public holiday rates applying to casual labour in the workforce.
- Government address current barriers to the movement between industrial awards.
- There should be no diminution of access to piece workers in any future labour arrangements.