



JC: 1505

18th February 2016

Regulation of Australian Agriculture
Productivity Commission
Locked Bag, Collins St East PO
Melbourne VIC 8003

RE : Inquiry into Regulation of Australian Agriculture

Our Company is a member of the Australian Chicken Meat Federation and fully supports its submission to the Commission of 12 February, 2016.

However, being one of only two Processing Groups remaining in the Sydney Basin, we wish to not only reinforce the concerns raised in the ACMF submission, but further highlight the issues particularly impacting on the Sydney basin based processors.

Our frustration with Government inaction relating to the issues raised in the submission, are best summarized in the following Reports:

1. 2010 Submission - Metropolitan Strategy Review
2. 2013 Submission - Draft Metropolitan Strategy for Sydney to 2031
3. Poultry Meat Industry Committee of NSW Report (NSW Government) – Economic Value of the Poultry Meat Industry: Sydney Region.

Despite NSW Government statements over many years that Agriculture in the Sydney Basin has to be protected, the reality is that the opposite has occurred with Government policies directly responsible for the steady decline of the Industry. The Industry was so concerned about this decline, that under the auspices of the Government's NSW Poultry Meat Industry Committee, it commissioned a series of Reports identifying the Economic Value of the Poultry Industry in various regions and the State.

The Executive Summary of Economic Value Report for the Sydney Region (page 1), notes that NSW's national market share fell by 6.8% over a 10 year period to 2012. Since that time, additional processing plants have closed at Baiada Pendle Hill, Inghams Casula, Sunnybrand Byron Bay and an Inghams Further Processing Plant at the Central Coast. THE SYDNEY BASIN HAS SUFFERED A DISPROPORTIONATE AMOUNT OF NSW'S MARKET SHARE FALL, LEADING TO A SIGNIFICANT LOSS OF JOBS AND CREATING A POTENTIAL FOOD SECURITY ISSUE IN THE FUTURE.

Three major issues in particular have led to the detrimental impacts on the Industry in the Sydney basin:

1. Loss of Agricultural production areas with little or no action of Government to replace these areas. Our company has had only one new farm development approval in the last 15 years, which is severely affecting our future production growth.

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2. Onerous Environmental laws which can only be described as ANTI-BUSINESS:

* The EPA's Odour policy specifies in certain circumstances that there will be nil odours at a boundary, which at times is impossible to achieve eg. due to fertilizer or manure. Local Government then use this policy to impose costly and delaying provisions to development approvals.

* Noise Policy – The current NSW noise policy is in actual fact an 'Industrial Noise Policy', which agricultural industries have to adhere to. The Industry has called for a specific 'Agricultural Noise Policy' but to date this request has fallen on deaf ears at Government level. A simple example of the absurdity of the current policy, is a transport vehicle can legally operate on any road on a 24/7 basis, however as soon as that same vehicle turns onto a farm property in night time hours, it is illegally operating. Outcomes from this policy includes:

– Councils imposing onerous conditions to mitigate potential noise outputs. For example, many of our farms have curfews restricting night time operations causing higher costs and animal welfare issues. Development applications increasingly have extraordinary conditions imposed with our latest farm having to construct a 450 metre long and 4 metre high vegetative barrier around his farm, to insulate the farm from the "outside world"! This barrier took over 4 months to construct utilizing over 2,000 trailer loads of soil and having a cost value of over \$500,000!

– Lengthy delays with the development application process. One Tamworth application was before Council for 7 years before ending up in the Land and Environment Court. Legal and professional costs alone would have reached \$1m.

3. Ineffective/inefficient Development Approval processes at local government level, leading to costly, inconsistent and highly politicized decision making. Also the length of the approval process would normally be measured not in months but years! Councils are all too willing to refer the decision making to the Land and Environment Court, regardless of the cost.

We urge the Commission to review the attached Reports and submission of the ACMF and assist in addressing the issues impacting on the efficiency and viability of the Industry and Agriculture in general. Not only are current government policies costing jobs and productivity but creating a future food security issue, particularly in the Sydney basin.

Yours faithfully,

John Cordina
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