



**Submission To:**

**National Food Plan**  
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This submission is presented by the Chief Executive Officer, Geoff Penton, on behalf of the Queensland Murray-Darling Committee Inc. (QMDC). QMDC is a regional natural resource management (NRM) group that supports communities in the Queensland Murray-Darling Basin (QMDB) to sustainably manage their natural resources.

**1.0 Background**

QMDC made submissions on the Draft policy entitled *Food for a Growing Economy: An Economic Development Framework for the Queensland Food Industry* and the *2011 Australia Government National Food Plan Issues Paper*. The below comments therefore build on the issues raised in those submissions, some of which have been considered in the National Food Plan Green Paper (the Green Paper).

**2.0 Comments on Green Paper questions**

***Chapter 1 – A National Food Plan for Australia***

***1.1 Do you agree with the possible overall approach outlined in this green paper to create a more strategic, better integrated and transparent approach to food policy?***

QMDC agrees that *a more strategic, better integrated and transparent approach to food policy* will enable Australia's food industry to address national and global food security issues. The Green Paper has the potential to offer some very exciting policy, planning and research opportunities for the food industry at a local, regional, and national level.

QMDC is pleased to see the Green Paper has clearly recognised the importance of natural resource management and that environmental responses are needed to sustain a food industry from paddock to plate.



### **Chapter 3 – Australia’s food policy framework**

*3.1 Do you agree with the proposed outcome and objectives outlined in this green paper to guide the Australian Government’s development of food-related policy and stakeholder consultation mechanisms?*

QMDC believes the use of the word “sustainable” requires more discussion and clarity in order to add integrity to the proposed outcome and objectives of the Green Paper, especially in context of prioritising a national sovereign obligation to supply food for the communities and people of Australia first and foremost.

As more and more land is being taken out of production because of mining operations, urban expansion, and salinity impacts, the desire to improve sustainable production will need to fully consider the impacts of migration in Australia and population growth. National obligations must take precedent over economic ventures that are geared towards chasing international market opportunities.

National food security relies on good land management appropriate to regional land types. Food security will be achieved by building resilient and adaptive production systems and communities, especially during times of drought. Land condition decline greater than that which is recognized as drought induced, and a result of management practices, needs to be identified and assistance provided to apply better management appropriate to land type. The Commonwealth inquiry in 2001 into public good conservation and the impact of environmental measures imposed on landholders raised many issues pertinent to this Green Paper. The recommendations of the resulting report entitled *Public good conservation: Our challenge for the 21st century* need to be fully realized and implemented as a component of the policy approach adopted through this Green Paper.

*3.2 The Australian Government is seeking feedback on a number of alternatives to improve leadership and stakeholder engagement on food policy issues. These alternatives are set out in Section 3.4.1.  
Do you have a preference for a particular alternative or a specific suggestion for another mechanism that would provide better leadership, coordination and stakeholder engagement on food policy issues in Australia?*

QMDC recommends that within each of the models there should be a *Memorandum of Understanding* arrangement with regional NRM organisations to gather data, distribute information and implement programmes. Each alternative needs a mechanism of being in touch with regional NRM bodies to provide that structure.

Recognising the leadership offered by regional NRM organisations will enable NRM organisations to fulfil a broker/moderator type role. The aim of the role will be to facilitate food production in a sustainable manner that improves community well-being whilst sustaining natural resource capability e.g. water quality and quantity, soil health, biodiversity and vegetation protection, weed and pest management. The role will ensure national policy and planning does not promote or enhance production at any cost.

Regional NRM representation on the NRM Ministerial Council is essential so that the progression from the Green Paper to policy and subsequent implementation is guided to protect and improve the sustainability of Australia’s production base – our natural resources.

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QMDC recommend that the *State of Food System Report* must be written in conjunction with the *National Environment Accounts*.

## **Chapter 4 – Australia’s food security**

*4.1 Do you agree with the analysis that, broadly speaking, Australia is food secure? If not, why not? Please be specific and provide evidence to justify your position. What additional data could the government draw on to measure Australia’s food security?*

QMDC asserts that an analysis on food security needs to take into account the seasonality of supply. If, for example, a particular variety of fruit or vegetable is not available in some seasons, importing it is not necessarily supported because of biosecurity risks and the cost of fossil fuel consumption.

Improved consumer education will be needed to achieve improved seasonality. In order for food security to improve in Australia consumer choice must value seasonality as a core component of their individual choices and as a commitment to national and international food security.

*4.2 The Australian Government is seeking feedback on the option of working with state and territory governments and the food industry to develop strategies to mitigate risks and maintain continuity of the food supply in a major emergency. Section 4.5 of Chapter 4 outlines some options. Do you support these options? Do you have specific suggestions for other options or strategies?*

QMDC recommends that strategies to maintain continuity of food supply to the remote communities in Far West and Northwest Queensland also need to be considered.

*4.3 Do you agree with the analysis of the factors that contribute to individual food security? Do you support the approaches outlined? Do you have specific suggestions for other options or strategies?*

QMDC suggests there other key components that need to be considered when measuring food security:

- **Soil fertility** - nutrient conservation and recycling e.g. phosphorous
  - **Zero waste strategy**
  - **National Index of Water Use Efficiency** – kilojoules of food produced per megalitre of water used
  - **Land Extent** - extent of Class A soils (technical process to agree to Class A across states and extent should take into account land area lost to urban development and other industry)
  - **Regulation** – consistency across nation re land use planning controls
  - **Climate challenges** – areas not traditionally considered suitable for cropping or grazing may need to be re-evaluated for future food production needs.
- The regional significance of policy implementation should be considered at the federal level. Regional support mechanisms, for example, can promote innovation for industries and communities to develop self-reliance by encouraging appropriate land management responses for regional based landscapes.

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Policy should include land condition assessment criteria appropriate at the regional level. Different land types respond differently under drought conditions, therefore regionally relevant baseline data of land condition for non-drought and drought years should be integrated into assessment criteria. The inclusion of Land Condition assessment criteria will improve the transparency of the assessment process when declaration of drought is sought. It will also form a comparative basis for recognizing difference in land management practices and inform the development of incentive or reward based programs for sustainable land practices.

#### *Chapter 5 – Safe and nutritious food*

##### *5.1. The Australian Government has strategies, policies and programs in place to:*

- ensure all Australians have access to a safe and nutritious food supply support healthy lifestyles*
- reformulate foods, improve food labelling and educate consumers*
- improve nutritional outcomes for Indigenous Australians*
- provide a comprehensive and effective food safety regulatory environment*
- build capacity to control known and emerging food safety risks.*

*This green paper provides details of these initiatives and outlines the Australian Government's future policy directions, including the development of a national nutrition policy. Are there additional issues the government should focus on in its future policy directions? What factors should the government consider in developing new, and reviewing existing, policies and programs?*

Awareness and concern about environmental issues is increasing throughout Australia, with drought and climate change issues beginning to influence state and regional policy and planning. If public concern and consumer expectations about environmental problems are already impacting on purchasing decisions then placing more pressure on the food industry to demonstrate social and environmental responsibility is necessary. QMDC recommends that the government consider the below factors when developing or reviewing new and existing policies and programmes.

- **Land management certification systems** - QMDC asserts that policy must address certification of land management systems in order to meet future consumer need and preference and an auditable continuous improvement system. Promotion of systems such as EMS ISO14001 will enable discerning consumers to have confidence in the product and can be reflected in the product's labelling. When this documentation is available, consumer preference is then driven by a wider range of factors including environmental sustainability. QMDC assert that In order for this to occur, some additional strategies include:
  - Implement market driven 'clean and green' reporting standards
  - Implement market driven 'clean and green' labelling standards
  - Maintain research, development and extension budgetary support for industry producers



- **Water management certification** - Water quality is also important for food quality. Rural communities are concerned that food produce may be contaminated by water e.g. CSG associated water consumed by stock or used for irrigating crops. Some community members are suggesting labelling and certification that contaminated water has not been used in food production and processing.
- **Auditing the food industry** - QMDC supports the auditing of the food industry to ascertain the environmental performance of both individual companies and associated sectors. Determining whether a food processing plant, for example, is eco-efficient is a direct and immediate method of addressing environmental issues in a cost-effective manner.

The benefits of undertaking an eco-efficient or environmental performance audit can include:

- direct financial savings from reducing costs for raw material, water, energy and other resources
- savings from reduced waste generation
- greater productivity through improved use of raw materials
- reduced operational and maintenance costs
- enhanced public image and consumer support for the company, leading to competitive advantage
- motivation for continuous improvement
- reduced exposure to risk and liability due to proactive management of environmental impacts
- capability to influence future decisions regarding generic levels of compliance for food industry facilities
- improved workplace health and safety.

QMDC submits that the food policy must inform a coherent corporate social responsibility (CSR) strategy, based on integrity, sound values and a long-term approach that offers clear business benefits to the food industry. Policy must align along the food value chain corporate goals with those of society; maintaining an individual company's or sector's reputation; securing their continued license to operate; and reducing their exposure to liabilities, risks and associated costs.

- **Food miles** - Promote seasonal foods, local production and consumption e.g. farmers' markets and local food "100 mile" restaurants e.g. tax incentives for "100 mile" restaurants and businesses.
- **Genetic engineering and nanotechnology and labeling** - QMDC supports that mandatory labeling be introduced and that nanoparticles be regulated as new chemicals, requiring them to pass new safety assessment before being permitted into products.



- **Nutrient recycling** - QMDC asserts the Green Paper needs to support state and regional plans for nutrient conservation and recycling as a key strategy for sustaining food production. Solving the nutrient crisis is urgent and requires Australia to seriously commit to nutrient conservation and recycling involving the following measures:
  - recycling nutrients within the farming system on a substantial scale
  - eliminating fertiliser subsidies, which promote wasteful use
  - introduce incentives to conserve nutrients
  - preventing or reducing all forms of erosion
  - fund research on ways to conserve, recycle and reuse nutrients all along the food chain
  - implement plans to compost all organic urban waste and put it back into the food cycle
  - develop improved technologies to harvest nutrients from waste streams
  - harvest urban sewage sludge and transform it into fertiliser
  - replace water-based toilets with composting designs

## **Chapter 6 – A competitive and productive food industry**

*6.1 This green paper sets out the government's proposed approach for supporting productivity growth and global competitiveness in the food industry, which includes: a market-based policy approach; ongoing reforms to improve biosecurity and help industry adapt to climate change and drought; fostering and investing in innovation; building human capability and a skilled workforce; better regulation along the supply chain; effective competition laws; and broader infrastructure investments and regulatory reforms.*

*Are there gaps or deficiencies in this proposed approach?*

- **Supporting productivity growth** - QMDC believes the Green Paper needs to ensure there is integration across research and development and particularly extension. This is essential given the number of mixed enterprises across Australia and because many natural resources e.g. land systems and bioregions are covered by multiple enterprises and multiple commodities. A structural change is needed to align the extension elements of current CRC and RDC funding to enable an integrated regional delivery approach.
- **Building human capacity** - Poor profitability as a result of failing to cover the true long term costs of production is a major concern for many farmers. It is evidenced by continually rising debt without corresponding increase in productivity. Rural communities are rapidly losing social capital impacting on farm businesses in a many ways, lack of labour, loss of knowledge, skills and experience etc. Supporting productivity growth requires the political arena and the policy makers to have a good, holistic understanding of rural issues with a policy approach that treats the causes and not the symptoms of social capital decline and loss of profitability. The implications of poor policy, often lead to “perverse outcomes” e.g. past drought policy and poorly coordinated biosecurity risk management. Rural communities must be supported in order that emerging rural leadership is able to develop the agriculture industry within a contemporary context providing real solutions to national food security in a very challenging global environment.

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- **Broader infrastructure investment** – The Green Paper needs to promote infrastructure development which focuses on taking expensive trucks off the road so that more equitable access to and better use of railroad for the food industry allowed instead of sacrificing agriculture to mining priorities. Addressing the issue of fossil fuels is urgent. Oil costs will rise and consequentially food prices will too. There has to be greater investment in rail infrastructure to ensure food can be moved more economically.
- **Reforms to improve biosecurity and help industry adapt to climate change and drought** – Policy responses and regulatory reform should provide support for the application of stronger regional based approaches that facilitate community and local industry approaches to manage climate variability in the longer term and which recognise and link the value of ecosystem services to market land values.

Subsidies for movement of livestock for agistment purposes must require the assessment of the property they are being moved to or moved from at any point in the transaction. Processes to safeguard agistment to or from drought affected areas or where the land has not adequately recovered from drought conditions needs to be better facilitated in current and future policy and climate change strategy.

Policy positions with respect to climate change and drought should complement other state and federal policy/legislation, for example, where fodder is brought into a property for livestock, the legal requirement to ensure that the product and transport is free of weed seed or other contaminants should be adhered to and accompanied by a declaration. New and additional weed problems for a district should be avoided.

The stage of business maturity for agricultural enterprises impacts their capacity to respond adequately to drought conditions and long-term natural resource management, for example, developing businesses in comparison to established businesses have different economic drivers underpinning their production needs. These differences must be recognised when reforming policy and regulation.

Economic measures integral to “productive growth” or “market based” policy must incorporate ecological values and asset management. Eligibility-based means tests on economic assets, for example, do not currently consider the long term state of the natural asset which underpins the production system. Reliance on market values to underpin asset value tends not to incorporate the condition of that asset. This includes the poor recognition of ecosystem service values which are included in any landscape but not often linked to land market values. The opportunity cost of maintaining these systems is often arbitrarily linked to lost production. Inappropriate drought responses can lead to the degradation of these ecosystems. Stewardship services are not recognized in commodity markets for agricultural products to reward maintaining the ecological health of these systems.



- 6.2 *The government is seeking to increase the value of Australia's food exports from across the supply chain, including the value-added component.*
- a) *Do you think that a target of doubling the value of our food exports by 2030 is achievable? If not, what target would be?*
- Doubling food production will not happen if mining and other development (housing) is permitted on Strategic Cropping Land and Good Quality Agriculture Land.
- b) *How could this be achieved in a market-driven economy like Australia? What would government and business need to do?*
  - c) *What would be the costs and benefits of these actions?*
- 6.3 *The use of new technology in food products is likely to be increasingly important in Australia and around the world, helping to meet evolving desires and needs of sophisticated consumers and ensuring an adequate global supply of food for a growing population. However, some people are concerned about new technology despite substantial regulatory arrangements to manage any potential risks. What should governments, businesses, peak associations and consumers be doing in response to this trend?*
- More extensive food labelling
- 6.4 *One option to increase agricultural productivity to help the sector meet future export growth opportunities and challenges, such as increasing productivity growth in a changing climate, is to increase rural R&D investments over a number of years. This would be in addition to continually seeking better ways to increase the overall benefits of this investment.*
- a) *Is this the best way to help the agricultural sector meet the challenges and opportunities of the coming decades? Why/why not?*
  - b) *What would be the costs and benefits of this approach?*
  - c) *How could any additional investment be targeted to achieve the greatest overall benefit to Australia?*

Greater overall benefit could be gained by investing in climate change research on the following topics:

- **Interactive climate change impact scenario analyses on e.g. land use change, dryland farming systems including cropping and grazing industries and water resources**
  - Sustainable intensification of agriculture impacts on natural resources in face of climate change
  - Better understanding of topographical sensitivities of climate change predictions Better informed Land Capability thus Land Use Suitability at the regional and property scales
  - Impacts of extreme events e.g. soil erosion, salinity, land degradation and loss of agricultural productivity



- **Understanding impacts of climate change on water quality and quantity, resource use at a river systems scale. Impacts of extreme events, disturbance regimes – floods, droughts, water availability.**
  - Aquatic ecosystems impact and adaptation assessment
  - Impacts at a catchment scale to rivers, wetlands and lakes, local run-off and rainfall and groundwater dependent ecosystems
  - Impacts on irrigation farming systems
  - Rainfall distribution patterns, intensification (this data then can be added into pasture and crop models)
  - Temperature extremes (provides indication of frosting patterns, water temperature in creeks (especially on the edges)
  - Flood management – data collection needs/remote management options for data collection.
  - Build adaptive capacity to reduce reliance on surface water resources that are unlikely to remain viable under climate variability scenarios
  - Invest in understanding of groundwater aquifers, recharge and likely impacts of climate variability
- **Better understanding of climate variability/ change and the consequences to social and economic wellbeing and quality of life**
  - Assessment of adaptive capacity of communities and industry sectors and understanding constraining and enabling characteristics (eg human, social, natural, physical, financial capitals)
  - How to best refine the messages and encourage a more open attitude to a changing climate
  - Institutional and social change and stakeholder engagement processes
  - To have clear guidelines for actions with rules of thumb that are easy to communicate are critical to achieve wider community acceptance and adoption
  - Support existing training projects and improve individual capacity to manage climate variability
  - Integrate Aboriginal knowledge and aspirations
  - Better knowledge regarding the challenges of regional transformation for core sectors and industries
  - Predictions, scenarios, risks and opportunities in relation to socio-economics and land use in particular
  - Identify communities that are vulnerable due to reliance on natural resources which may be at risk due to system changes such as climate variability
- **Better understanding of climate variability/ change and the consequences to economic growth e.g. employment, new industries. Feasibility of threat mitigation (risk assessment and cost/benefit analysis)**
  - Regional case studies – regional economic assessments including future viability of farms, small business and other industries
  - Plantings to increase carbon sequestration could have a range of unintended negative impacts if poorly situated or designed, leading to reduced stream flow or groundwater recharge, introduction of monocultures Consider major construction e.g. roads, railroads and how this influences adaptation responses
  - Explore issues relevant to the concept of payment for ecosystems services and how or even should a fiscal value be placed on ecosystem services , for

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- example, what could the value be for landholders protecting RE areas sequestration and biodiversity benefits
- Feasibility of low emissions alternatives that could be mobilised and replace carbon intensive projects being proposed as an alternative investment option
  - Predictions, scenarios, risks and opportunities in relation to socio-economics and land use in particular
- 6.5 *The Australian Government is interested in identifying and evaluating future regulatory reform opportunities. How could food industry stakeholders best help to achieve this? What do you believe are the merits (costs and benefits) of the possible options in section 6.7.4?*
- 6.6 *One way for food businesses to add value is through increased quality, such as high product standards, new traits or nutritional attributes. Governments in Australia generally adopt little or no role in regulating quality, except where required for public health reasons.*
- a) *What opportunities are there for businesses to add value through quality attributes?*
  - b) *Is there a role for government to encourage this or remove barriers such as regulation? (please explain/elaborate).*
- 6.7 *The Australian Government welcomes further specific feedback about particular regulations that significantly affect food businesses, by imposing direct and/or indirect costs and by limiting commercial opportunities.*
- a) *Where possible, information would be appreciated about: the specific regulations of concern; the nature and size of the impost (time, cost and lost business opportunities); possible ways to improve the regulation and the likely benefits and beneficiaries; and the most important benefits of those regulations.*
  - b) *Are there any areas in which stakeholders feel improved regulation is needed to help the market function properly?*
- 6.8 *Competition issues are canvassed in the green paper. Generally speaking there is evidence that competition can benefit consumers in various ways, including placing downward pressure on prices and encouraging innovation and greater choice.*
- a) *What are considered to be some of the regulatory or structural barriers to competition in the food industry?*
  - b) *How could the operation of the industry's voluntary Produce and Grocery Industry Code of Conduct be improved?*
  - c) *What would a regulatory approach such as a mandatory code and/or supermarket ombudsman achieve over and above current arrangements (bearing in mind that any investigation would need to be based on a complaint)?*
  - d) *How might the projected growth of private label products affect competition within the food industry, either positively or negatively? Who do you consider will be affected and in what way?*
- 6.9 *The government is seeking feedback on the possibility of building the evidence base on food industry trends and market changes. This could aim to inform private and public sector decision making, including for infrastructure planning and future food industry needs. This could help ensure Australia has adequate resources in place to support food sector growth.*
- Are you aware of any critical information gaps, particularly about growth opportunities such as in Asia? How could these gaps be addressed, and if they were, how might this help planning?*



- **Suggested information and research requirements to inform improved policy**
  - An assessment of current knowledge and science to prioritise landscapes in terms of climate change risk and impact, for example, are native pasture grazing systems more at risk than lowland floodplain cropping areas? (See above for other research areas)
  - Improved mapping information to support property planning and natural resource management. Including information on soil water storage capacity and landscape design impacts on landscape resilience to change in climatic variability.
  - Further research to increase the 'skill' of climate forecasting systems when applied at a regional scale. This could greatly enhance the capacity of land managers to incorporate this into their strategic and tactical responses.
  - Improved scale of information for management decision making. Currently mapping of soils and landscapes in parts of Australia are limited in their useful application for planning unit/property based recommendations and assessment. Primarily, improved resourcing into research to better inform Land Capability thus Land Use Suitability at the regional and property scales could enhance self-reliance from land managers to better manage their landscape constraints in their production system while quantification of other landscape values e.g. biodiversity.

## **Chapter 7 – A strong natural resource base**

*7.1 Pressure to increase food production in coming years, in response to increased demand from a growing global population, could place additional stress on Australia's natural resource base. What further initiatives could the government consider to encourage sustainable farming and fishing practices that balance economic, social and environmental benefits?*

- **Cumulative impacts** - address cumulative impacts on natural resources
- **Threshold limits** - Set threshold limits
- **EPBC Act** - uphold the objectives of the EPBC Act
- **Develop initiatives informed by NRM organisation's programmes** – QMDC, for example, has designed and supported regional initiatives that endeavour to encourage sustainable land and water management practices and use. Some of these are listed below and can provide working examples for the food industry to contribute to and build on:
  - Coordinating extension work for Grain n' Graze
  - Facilitating ALMS (Accredited Land Management System) process
  - Committed funding to school education and Smart Science Program
  - Delivery of NRM in partnership with Landcare groups
  - Funding on-ground works through sub-catchment planning and thereby reducing soil erosion, improving production capacity, improving soil and water quality
  - Soil conservation works and technical advice provided

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- Participating in key stakeholder advisory committees to produce relevant legislation, policy and planning instruments and mechanisms e.g. Strategic Cropping Land Advisory Committee
- Creating a bioregional assessment tool to address cumulative impact of CSG and coal mining on water resources
- Coordinating a flood recovery program to help landholders get back into productive action
- Regional and policy development through a range of projects e.g. climate change and variability and the key risks to natural resources and production
- Mapping natural resources e.g. water resources, SCL, GQAL etc

*7.2 Australian society places high expectations on the environmental and social responsibility of Australia's food industry, although this is not always reflected in purchasing behaviour. What is preventing markets from encouraging (via price signals) the food industry's responsible management of the production base?*

- Lack of alignment to certification systems
- Nutrient waste and the absence of policy that views all sewage waste as a resource that should be recycled (composted) and disposed of on land. (This would address nutrient and soil structural decline and keep pollutants out of rivers).
- Lack of support for paddock to plate philosophy
- Lack of investment in managing transport costs across a region by aligning transport to a critical mass in order to lessen costs

*7.3 This green paper outlines a number of initiatives aimed at reducing food waste across the food supply chain in Australia. What specific further waste management measures could the government consider that would meet the multiple objectives of increasing food security, providing healthier diets, improving environmental performance and addressing climate effects?*

- Nutrient recycling as discussed earlier at 5.1

## **Chapter 8 – Food trade and market access**

*8.1 The Australian Government is seeking to expand its food trade relationships in Asia over the medium to long term. This will require access to markets and a reduction in trade barriers for food exports. This objective could be pursued in a number of ways, including through further free trade agreements, strengthening Australia's agricultural counsellor network, as well as pursuing improvements to the multilateral rules-based trading system.*

- a) What could government and business do to expand food trade opportunities with Asia?*
- b) What kind of benchmark should Australia aim for? For example, should we seek to double our food exports to Asia by 2050?*
- c) How could this be achieved, and what would be the costs and benefits of doing so?*
- d) Which further countries in the Asian region should Australia seek to pursue trade agreements with?*

*8.2 The Australian Government proposes to continue to improve coordination of market intelligence across government and food export businesses to improve market access,*



*address technical trade barriers and strategically position the Australian food industry to exploit potential trade opportunities.*

- a) *What specific mechanisms should the government consider to achieve this outcome?*
- b) *How would you foster greater cooperation and coordination between industry and government to improve Australian market access for foods?*

8.3 *The government is developing a white paper on Australia in the Asian Century. It is anticipated increased productivity and wealth in Asia will result in increased demand for high value foods. What specific initiatives should the government consider to ensure Australian food exporters participate fully in these emerging opportunities?*

## **Chapter 9 – Global food security**

9.1 *It is in Australia's national interest to promote global food security. The Australian Government considers Australia can make the most effective contribution to global food security by focusing on: technology and expertise transfers to developing countries; trade-related development assistance; advocacy and support for appropriate policies at the global, regional and national level; and short-term emergency food assistance. Do you support the Australian Government's analysis? If not, what are the key gaps? Please be specific and provide evidence to justify your response.*

- QMDC believes the analysis requires further consideration with regards to a global open trade market and access to that market in terms of what is sustainable food production and consumption e.g. if Australia promotes the reduction of chemical use and fossil fuels when producing food but wishes to trade with countries or producers that do not practice similar food production methods is that appropriate or acceptable? Actions and priorities to protect and promote national food security must be mirrored by Australia's ethical approach to global food security.
- **International and national biosecurity policy** - the entry, establishment or spread of exotic pests and diseases pose significant economic, human health and environmental risks. If Australia is to remain relatively free from many of the pests and diseases that affect primary industries in other countries, effective biosecurity systems are required. As a consequence of globalisation, migration and climate change, Australia's borders are increasingly vulnerable to pest and disease threats.

To maintain Australia's integrity as an agricultural producer and exporter, an integrated international and national approach to biosecurity which promotes planning, education, incentives and regulation as key mechanisms is needed.

Shortcomings of biosecurity arrangements identified in a DAFF review need to be clearly considered in the Green Paper in order to:

- balance risk management activities along the biosecurity continuum;
- coordinate the collection, sharing and analysis of information on biosecurity risks;
- improve information technology systems used to collate, analyse and share this information;
- develop skills needed for risk management; and
- prioritise research and development to support risk management.

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Regulation is a necessary support mechanism to ensure compliance and participation, especially when a voluntary and proactive approach is not capable of achieving full participation.

Biosecurity policy and legislation therefore must clearly enforce not only the responsibility of local governments but also the State and Commonwealth's responsibilities for the adoption and delivery of both mandatory and voluntary implementation of biosecurity activities. In QMDC's opinion Commonwealth and State Land Protection Officers are clearly needed to support landholders dealing with pests and weeds.

QMDC asserts that legislative and policy measures that will help to prevent the introduction or spread of invasive plants, for example, in the QMDB, from pasture, include:

- Adoption and implementation of an industry Code of Conduct that meets current legislative requirements within the EPBC Act, the Biosecurity Act 2012 and other relevant legislation, and which encourages best management practice for weed seed spread prevention, and has adequate compliance for all stages of farming and grazing operations (and operators).
- Identification of risk of weed seed introduction or spread at all stages of farming and grazing and other associated activities. Two of the major forms of spread of weed seeds are in hay or seed. Until the mid-1990's the Queensland DPI Standards Branch was responsible for overseeing seed quality standards in the State, including the purity of seed samples and freedom from weed seeds. At that stage this process was replaced by a "Truth in labelling" scheme that is self-regulated by industry. The DPI Standards Branch at Indooroopilly in Brisbane was then disbanded. QMDC believes that this has been shown to be inadequate because seed samples have been sold that have been found to contain weed seeds. This has involved both crop and pasture seed. Such breaches have been more prevalent in "over the fence trading" where seed has been harvested and sold as a "catch crop" (not by professional seed growers) through advertising in local newspapers.
- QMDC has witnessed a sample of wheat seed contaminated by weeds, yet the seed lot was accompanied by a seed certificate that claimed the sample was weed free. QMDC is concerned that through pasture seeds security quarantines can be breached allowing weed seeds to spread. Much of the Giant Rat's Tail grass, for example, has been spreading between properties along coastal areas through contaminated pasture seed.
- QMDC understands that DPI developed a scheme that would have allowed pasture seed to be "guaranteed free" of Giant Rat's Tail at a cost of about 40-50 cents per kg. This however was rejected by local farmers on the coast in favour of "cheaper seed".



- Preparation and delivery of weed management plans in line with the Code of Conduct, and property, district, local government, regional and state pest management plans to mitigate risk.
- Increasing the knowledge and skills of people working in the agriculture and pastoral industry, to identify weeds and potential risks and respond appropriately.

Coordinated planning at a number of levels including species specific and according to appropriate scales will in QMDC's view influence key stakeholder practice and attitude change and delivery of actions on-ground. Where industry activities or persons are responsible for the introduction or spread of invasive plants or animals, they must prevent further spread of the infestation and actively manage with the aim of eradication. Where industry activities are conducted within existing invasive plant infestation areas, they must prevent further spread, and work cooperatively with affected stakeholders to actively manage or eradicate the infestation.

In order for regulation to be successfully implemented it must be linked to a number of implementation mechanisms such as codes of practices, guidelines and other biosecurity tools. QMDC recommends consultation with regional NRM organisations with regards to the production of these tools.

Managing the threats to regional assets requires national legislation to provide impetus to planning processes that reflect inter- linkages between local, regional, state and national strategies/plans, for example:

- Regional Pest Management Plans & Local Government Pest Management Plans
- Area wide (sub-catchment) management plans
- Rapid Response (emergency response) plans
- Species specific guidelines for current recommended practices
- Regional NRM Plans

The recognition and establishment of biosecurity zones and their risk management requires well executed actions that reflect the severity of the impacts and the most appropriate remedies. Coordination and collaboration amongst the key stakeholders who have responsibilities for those zones is a national priority, especially when the current costs of weeds, and pests, to Australia, is in the billions.