

Briefing Note for Inquiry Submission

Environment & Planning Committee (Legislative Assembly)

Due date: 26th of April 2024

Making a submission: By completing the form on the parliamentary website:

<https://www.parliament.vic.gov.au/get-involved/inquiries/securing-food-supply/submissions/>

Terms of Reference (ToR):

The Legislative Assembly Environment and Planning Committee was referred an inquiry into securing Victoria's food supply. It will examine the impacts of urban sprawl and population growth on arable land and the farming industry in Victoria.

Notes on the scope of the Inquiry:

Sustain, Dr Rachel Carey and several other food systems stakeholders have been in contact with the parliamentary research team regarding this inquiry. As a result of our and others' advocacy, the ToR have been altered so that first sentence can now be interpreted on its own— "**inquiry into securing Victoria's food supply**". This is due to the similarities between this Inquiry in its original ToR that focused on urban sprawl and population growth, and the [Green Wedge and Agricultural Land Review](#). For this Inquiry to add value and not just duplicate that Review, the team supporting the Inquiry were interested in a broader ToR.

The submissions page also makes clear that the inquiry focus includes "**the resilience of the Victorian food system, including the production of food, its transportation and sale**", so **issues related to climate change** and the **resilience of food systems to shocks and stresses** (such as the pandemic) are in scope, as **is food distribution and retail**.

What this document covers

There are three sections to this Briefing Note. **The first section, 'Recommendations and solutions for a resilient food system'**, is a list of suggested recommendations, based on research and stakeholder engagement. It is important to have a clear and concise list of the recommendations you are making at the top of the submission. This makes it easy for the committee members who may miss your recommendations if they are at the end. More detail and evidence for the recommendations is provided in the second and third sections.

You may choose specific recommendations that you consider to be a priority and / or add your own, based on your experience and knowledge regarding your locality/sector. **It is important that you personalise and contextualise your submission.**

The second section describes the **food supply and security situation** we face in terms of how resilient Victoria's food system is. This provides context to the recommendations. The third section '**Green Wedge report**', is a brief response to the recently published [Green Wedge Land Review Action plan](#).

Suggested submission structure

- 1. Recommendations and solutions for a resilient food system**
- 2. The current state of food supply and security in Victoria**
- 3. Reply to Green Wedge Agricultural Land Review Action Plan**

Key reference documents

The Foodprint Melbourne Resilience Report and Roadmap provide excellent research into key issues facing Victoria's food system. These documents outline recommendations that could be implemented to develop more resilience to key stressor events. These include climate change-driven extreme weather events and patterns of warming and drying, the COVID pandemic, economic and financial pressures, and geopolitical instability. We strongly recommend you draw on and reference these reports in your submission. Listed below are these and several other key documents that may be beneficial reference.

Foodprint Melbourne [Resilience Report](#)

Foodprint Melbourne [Roadmap](#)

[Foodprint supply chains diagram](#)

VACCHO FoodPath – [Food Policies for Aboriginal and Torres Strait Islander Health](#)

[Victorian Food System Consensus Statement](#)

[Australian Food Story – Federal food security inquiry](#)

[Royal Society of Victoria – Where does your food come from](#)

[Food Agility – Sustainable supply chains](#)

[Building resilience in the agri-food sector](#)

[Food Production and Supply in NSW – EPC inquiry into food security](#)

[Growing Edible Towns and Cities: A Survey of the Victorian Urban Agriculture Sector](#)

[Agriculture Victoria Climate policy](#)

[Climate change and Victorias wheat crops](#)

[Farmers for Climate Action FAQ](#)

[Agriculture Victoria – High prices and high costs](#)

[DFAT – Agriculture and food trade](#)

[Farm subsidies in Australia](#)

1. Recommendations and solutions for creating a resilient food system for Victoria

Below is a list of key recommendations drawn from the [Victorian Food System Consensus Statement](#) and other reports as related to the inquiry ToR. Unless otherwise indicated, all these recommendations are directed towards the Victorian Government.

First Nations food sovereignty

First Nations peoples successfully managed the land to create an abundance of healthy and diverse foods for tens of thousands of years before European colonisation.

- Work with First Nations communities to advance their food sovereignty goals including recovery of cultural knowledge, permanent land access and land restoration
- Support the recovery and cultivation of native crops that evolved here for millennia and are resilient to Australia's harsh climate: this will be essential to ensuring a secure local food supply in the context of increasing climate uncertainty

A strategic framework to guarantee Victoria's food system and food security

- Create a **Victorian Food System and Food Security Strategy and Investment Plan**
- Empower local governments to lead the **participatory development of community food system strategies** appropriate for their local contexts
- Develop a **Victorian Food Supply Chain Map** to understand the production, transport and distribution of food within and across Victoria as well as identify key vulnerabilities in transport and distribution infrastructure
- **Revise the Victorian planning provisions** legislation to make human and planetary health key strategic objectives of land use planning decisions
- Establish and **maintain strong planning protections to safeguard farmland** from urban encroachment (direct or indirect), ensuring its continued availability for food production in peri-urban areas around Melbourne and other regional centres
- **Implement and enforce planning protections**, including urban growth boundaries and green wedge management plans, to prevent further encroachment on agricultural land and preserve peri-urban farming areas
- **Resource a comprehensive food system monitoring framework** to track the success of a state-wide strategy and ensure its responsiveness to changing circumstances

A cohesive and collaborative governance structure for a resilient Victorian food system

- **Establish a Victorian Food Council** to oversee the implementation of the Victorian Food Systems and Food Security Strategy and Investment Plan, with diverse representation including First Nations, primary producers and others
- Establish and **maintain collaborative partnerships between government, industry, academia, and community organisations** to address the complex challenges facing peri-urban farming and to develop holistic and sustainable solutions for the future

Sustainable, regenerative food production

- Support and resource a pragmatic and well-planned transition to forms of food production that will nourish generations to come. This includes:
 - financial incentives for farms practicing agro-ecological food production including for biodiversity enhancement, reforestation and soil conservation and restoration
 - creating evidence-based, best practice agricultural policy that supports local and regional food production and consumption
 - ensuring that agricultural policy is supported by land use planning regulation.
 - Education, training and extension support for farmers to shift to more agro-ecological and resilient practices
- Encourage farm-level innovations such as agroecology, agro-tourism, and value-adding to enhance the resilience and economic viability of farming operations
- Decentralise and diversify food production, storage, distribution and retail to build resilience within Victoria's food supply chain to withstand external shocks such as pandemics, natural disasters, and global market fluctuations

Create diverse and short supply chains including:

- Strengthen local and regional food production to reduce dependence on imports
- Facilitate localised processing infrastructure such as small-scale abattoirs
- Diversify retail and distribution such as farmers markets and greengrocers
- Improve market access and distribution channels for peri-urban farmers, including opportunities for direct-to-consumer sales and local food networks, to enhance market opportunities and economic viability

Support for new agricultural endeavours and peri urban farmers

- Acknowledge the unique challenges faced by farmers operating on the urban fringe and on small holder plots, such as land access, land speculation, zoning regulations, and competing land uses
- Introduce tailored support measures and programs to address these challenges, including through education, training, and mentorship opportunities for aspiring and existing peri-urban farmers, equipping them with the skills and knowledge needed to succeed in the sector
- Build climate resilience within the peri-urban farming sector, including measures to mitigate the impacts of extreme weather events and changing climatic conditions on food production
- Invest in essential infrastructure and services to support the viability and sustainability of peri-urban farming operations
- Advocate to Federal government for better support for Victorian farmers, including structural and financial reforms that can assist new entrants into land-based food production.

Urban agriculture

Urban agriculture can play a vital role in supply food in Victoria and creates resilience to shocks that may disrupt longer supply chains such as bushfires and floods.

- Adopt the Roadmap to expand Victoria's urban agriculture sector developed by Sustain in its [Growing Edible Cities and Towns report](#)

Education and training

- Highlight the importance of resourcing the farming sector through education and training to ensure that people remain or are attracted to the sector.
- Design a curriculum for high school that fosters the next generation of growers
- Strengthen delivery of the VCE Food Studies curriculum to build levels of food system and food security knowledge for Victorian students, with a focus on First Nations culture, nutrition, health and sustainable land management practices

2. The State of Victoria's Food System

Below is a brief situational analysis of the Victorian food system. You may use this, add to it or create your own to justify the recommendations in the first section.

Victoria's food system is in urgent need of an overhaul. [The devastating fires, floods, and droughts](#) experienced in recent years have caused major disruptions to food production and distribution, exposing vulnerabilities in our food supply chain. With the climate crisis accelerating, these extreme weather events and associated disasters are likely to become more prevalent, and therefore likely to cause further emergency and crisis situations that will further impact food production and supply chains. These trends affect not only production and crop loss in our major foodbowl areas such as Shepparton, but also the integrity of supply and distribution networks, [leading to shortages in isolated areas](#).

Many submissions to the 2023 [Federal parliament's national food security inquiry](#) highlighted critical supply chain vulnerabilities especially regarding road, rail, bridge and port infrastructure as well as the inherent lack of resilience (and substantial wastage) in the very long-distance movement of food around Australia. Key recommendations of the House Standing Committee on Agriculture's report ([Australian Food Story: Feeding the Nation and Beyond](#)) included (Recommendation 14, p103) the development of a National Food Supply Chain Map identifying:

- Where products are grown or produced and in what quantity
- How they are transported
- Where they are processed
- What the major transport routes are
- The main centres for the collection and distribution of product
- Where transport routes are vulnerable; and
- What happens if they are cut

The Committee recommended (Recommendation 15, p104) that 'as part of the development of a National Food Plan, the Australian Government develop a transport resilience plan focused on food security, including the optimal location of distribution centres.' Similar actions can and should be taken by the Victorian Government to identify key vulnerabilities in Victoria's food supply chain and associated transport, logistics and infrastructure; and remedial action taken to address those vulnerabilities, with the priority being food security for all Victorians.

Victoria's food system is exposed to geopolitical instability and conflict. As seen in the [Ukraine-Russia](#) war and the worsening conflict in the Middle East, conflicts abroad can have major impacts on

Victoria's food production and supply chains. First, a reduction in exports from a major grain and seed-oil producing nation like Ukraine produced a spike in wheat prices, [although prices stabilised subsequently with other exporters \(including Australia\) making up the gap and the resumption of Ukrainian exports through the Black Sea humanitarian corridor](#). Should the war continue and should Russia remove Ukraine's access to the Black Sea, the [impacts on global wheat prices and global food security would likely be severe](#), with heightened price volatility and uncertainty.

Secondly, [Russia and Ukraine are major exporters of fertilisers](#) on which many Victorian farmers rely (Australia imports 80% of the nitrogen fertilisers it uses). As with wheat prices, [an initial sharp spike in 2022 was followed by stabilisation and reduction in fertiliser prices in 2023 as other countries met export gaps](#). Even so, [Australian farmers have absorbed increased input costs affecting their bottom lines](#). The ongoing war in Ukraine, combined with the prospect of the conflict in Gaza, Yemen and the wider Middle East escalating, means that Victorian producers [remain highly exposed to sharp rises in input costs](#) in the form of a potential oil price shock and another spike in fertiliser prices. Cognisant of these risks, in September 2023 [GrainGrowers called for strong government action](#) to reduce dependence on imported fertiliser through boosting domestic production capacity and the adoption of cleaner production methods.

Shocks to our food system will inevitably continue and become more frequent and severe. In response, we must orientate our food system to secure supply through localisation and diversification across production, distribution, and retail chains. This will foster a more resilient Victorian food and farming sector that will ensure food security, better health outcomes and more jobs.

Victorian farmers need support to transition to lower-input and regenerative forms of production, reducing their exposure to geopolitical uncertainty and enhancing their capacity to deal with extreme climate change. Due to the challenges outlined above, many [Victorian producers are facing increasing hardship](#). Exacerbating these challenges, levels of [national government support for farmers is amongst the lowest in the world](#), and we have one of the most concentrated food retail sectors that negatively impacts producers due to [their 'price-taker' market position](#).

There are two key actions for long-term resilience of Victoria's food system. The first is support for farmers to transition to [much lower-input forms of production through agroecology and regenerative agriculture](#). Mornington Peninsula Shire Council is leading the way here with its [Food Economy and Agroecology Strategy](#) and associated Action Plan, supporting peninsula producers to develop and implement their own peer-to-peer systems for verifying regenerative agricultural practices.

The second is for a rebalancing of the food system to support diversified farming, including small to medium scale and close to Melbourne and other major Victorian population centres. For such farming to be viable we will need support for more diversified market channels that can provide fair and stable prices for Victoria's farmers as they transition towards agroecology.

A resilient, diverse and regenerative food system benefits us all. Investing in securing Victoria's food supply and supporting the transition to regenerative agriculture and more localised markets will result in a stronger, more resilient economy, a healthier population leading to lower healthcare costs, and community cohesion. With [over 40% of our diets coming from ultra-processed foods](#), the current Australian and Victorian food system is the leading cause of ill-health and disease. This trajectory is neither sustainable nor resilient.

We need a food system that will ensure an abundance of good food for future generations, grown locally and supported by all levels of government. The [Vermont Farm to Plate Plan](#) is an excellent example of an integrated, long-term approach facilitated and resourced by the state government.

3. Green wedge report

The Green Wedge Agricultural Land Review that was first established in 2018 has finally published its recommendations in the form of an [Action Plan](#). The Plan details 20 actions grouped under six themes, namely:

- Protecting Melbourne’s Food Bowl
- Planning for Future Farming
- Securing the Right to Farm
- Establishing Stronger Protections
- Adopting Smarter Land Use
- Setting Tighter Controls

We acknowledge that the Plan commits the State government to principles that, if fully implemented and sustained over time will enhance the resilience of Victoria’s food system and strengthen food security. That said, the Plan is in many respects ‘a Plan to create a Plan’ and as such falls short of what we and many stakeholders expected from the state government after so many years of consultation and engagement on these questions.

Many of the actions are framed in terms such as ‘develop criteria’, ‘update agricultural planning policy’, ‘explore opportunities’, ‘provide more guidance’, ‘develop a new regional policy’, ‘develop a new Planning Practice’, ‘review and update decision guidelines’ and the like. Given the extensive detail provided in nearly 1300 submissions we and others expected that many of these new guidelines, policies and criteria would have been drafted and released together with the Action Plan to demonstrate a sense of urgency on the part of the government, considering the serious challenges facing Victoria’s food system noted above.

The Action Plan claims to have been informed by a Government-adopted position, in response to strong stakeholder feedback, to recognise the importance of all agricultural land around Melbourne in the planning system. In contrast to this, the Green Wedge and Agricultural Land Review had initially proposed identifying only “high-quality” agricultural land for protection. With the government’s proposed Action Plan now revealed, it is not clear that the intent to protect all agricultural land will be implemented. For example, one of the most relevant actions (Action 5) seeks to update agricultural planning policy to better protect agricultural land within 100 kilometres of Melbourne and “make the best use of our fertile soils.” The “quality” or otherwise of agricultural land is the first argument used for its conversion to non-agricultural use, and this is a critical element of the ToR for the Inquiry.

Submissions to this Inquiry provide an important opportunity to ensure that any planning policy updates reflect the urgency around the prevention of permanent loss of peri-urban agricultural land through its conversion to non-agricultural use (usually residential). A case in point are the Werribee South Market Gardens. In February 2023, Sustain facilitated a workshop with 40 market gardeners from the Werribee South Market Garden green wedge area as part of a food systems capacity building project with the City of Wyndham and stakeholders in that municipality. The farmers raised two major issues: land use policy and related costs of maintaining agricultural businesses and the quality and price of recycled water.

Regarding **land use policy**, farmers raised the increasing value of land due to speculative investment by non-farming parties (land banking). This has led to an increase in rates, which farmers are struggling to pay. Further, the ongoing uncertainty about the future of the green wedge and whether Werribee South may be rezoned for urban development in the future restricts their willingness to invest in infrastructure and other upgrades to their businesses.

As regards **water quality**, several farmers stated that they have lost crops due to high chlorine levels in recycled water from the sewage treatment plant as well as ongoing salinity issues. The Werribee River Association has consistently raised concerns about pollutants found in treated water, including drugs, synthetic hormones and other harmful substances. Notifications from Southern Rural Water about algal blooms were also raised.

Regarding **water price**, farmers stated that the current model of ‘user pays’ makes recycled water unaffordable, especially in a context where other input costs are raising. They want a new costing model for recycled water, with the cost shared between government, tax payers and producers. They are calling for long-term investment to improve the quality and lower the cost of recycled water, while assuring that such water is truly fit for purpose.

Action 1 of the Action Plan commits the government to ‘introduce a new planning scheme overlay to protect key irrigated agricultural areas in Werribee and Bacchus Marsh’ which, when implemented, will in theory permanently protect Werribee South for agricultural production. However, there is very little in the Plan that addresses the farmers’ concerns about substantive measures to address their long-standing concerns regarding the quality and price of recycled water. Further, there is little in the Plan that would assist with the long-term financial viability of farmers by (for example) compensating local governments to provide rate relief to farmers in areas such as Werribee South where land values have risen sharply in recent years.

Benchmarking principles for planning policy and ordinance

More broadly, the Plan falls far short of what would be required to truly ‘future-proof’ the foodbowl areas of Melbourne and other Victorian cities and towns. We recommend the incorporation of the following series of benchmarking principles to guide the development and implementation of planning policy and ordinance (state and local) to achieve this aim.

Food production

1. Does the planning scheme support “accepted agricultural practices” by exempting the from the requirement to obtain a planning permit (noting other regulation may apply)?
2. Does the planning scheme support “accepted farm structures” by exempting them from the requirement to obtain a planning permit (noting other regulation may apply)?
3. Does the planning scheme facilitate:
 - Expansion of the array of food produced – to satisfy demand for local food and expand access to local food for the community?
 - Resilience against climate change, peak oil, and other threats?
 - New sources of revenue on-farm? Does the planning scheme support non-exempt agricultural uses – farm-based businesses, agritourism, direct sales – by taking a generally flexible and scale-sensitive approach?

Food Processing and Manufacturing/Aggregation, Distribution and Storage (wholesale distribution)

4. Does the planning scheme respond to the scale of an operation and developmental needs for food processing?
5. Does the planning scheme provide for the on-farm sale of prepared food, if components of that food are produced or processed on the farm?
6. Does the planning scheme facilitate:
 - Producers self-distributing their products, especially when they have small and medium-sized farms?
 - Producers' access to all types of local and regional supermarkets, restaurants and institutions – where most food is purchased – which is a necessary precursor to significantly expanding the consumption of locally grown products?
 - Secondary integrated agricultural activities on farms – such as the sale of non-farm products (where these are ancillary to the marketing of an on-farm product)? And the hosting of educational and cultural events related to farming?
 - Personal relationships among producers and consumers whose collective desire is to eat food that is healthy, fresh, tastes good, and to support those whose produce it?

Nutrient Management

7. Does the planning scheme facilitate:
 - The prevention of nutrient losses in the environment, moving away from waste management to nutrient management?
 - The production and use of compost as a valuable component of sustainable farming operations?
 - Sustainable agriculture practices – for example, environmental stewardship that supports soil health and biodiversity conservation/enhancement, prevents manure and fertilizer runoff, reduces soil erosion and prevents livestock access to waterways? This may be achieved with buffers and setbacks that relate to the scale of the use/development.

About the benchmarking principles:

Published in 2022, the *Farm to Plate Victorian Peri-Urban Planning Scheme Audit 2021* (the report) examined the potential for land use planning regulation to support peri-urban agriculture and its contribution to a sustainable local food system.¹ The report established benchmarking principles against which to audit the content of the Victoria Planning Provisions and 26 Victorian peri-urban planning schemes as they relate to agriculture and agribusiness. The benchmarking principles chosen for the planning scheme audit were adapted for local use, from the *Vermont Farm to Plate Framework* which analyses the food system of Vermont, USA. The *Farm to Plate Victorian Peri-Urban Planning Scheme Audit 2021* was created with the support of McLeod Family Foundation and Sustain The Australian Food Network.

¹ Martin-Chew, Linda. (2023). Farm to Plate Victorian Peri-Urban Planning Scheme Audit 2021. 10.13140/RG.2.2.13756.72320 https://www.researchgate.net/publication/369529653_Farm_to_Plate_Victorian_Peri-Urban_Planning_Scheme_Audit_2021