



**WALGA'S INTERIM SUBMISSION TO THE  
DEPARTMENT OF AGRICULTURE, FISHERIES AND FORESTRY**

**NATIONAL FOOD PLAN  
GREEN PAPER**

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## **INTRODUCTION**

The Western Australian Local Government Association (WALGA) is the united voice of Local Government in Western Australia. The Association is an independent, membership-based group representing and supporting the work and interests of all 140 Local Governments in Western Australia.

The Association provides an essential voice for 1,249 elected members and approximately 14,500 Local Government employees as well as over 2 million constituents of Local Governments in Western Australia. The Association also provides professional advice and offers services that provide financial benefits to the Local Governments and the communities they serve.

The comments contained in this submission have not been considered or endorsed by WALGA's State Council, as such, please be advised that this is an interim submission and that the Association reserves the right to modify or withdraw the comments as directed by State Council.

During the public comment period for the National Food Plan Green Paper, the Association sought comment from the Local Government Sector to inform a representative submission to the Australian Government. This submission, therefore, reflects the main issues and concerns raised by Local Governments in Western Australia in relation to the Green Paper.

## **INTERIM SUBMISSION**

Many aspects of the National Food Plan Green Paper have the potential to impact on Local Governments in Western Australia. Areas such as emergency management, roads and transport, community health and safety, land management, land use planning, food safety, waste management and environmental health are all key areas of Local Government business that are implicated in the Green Paper. The Association, therefore, considers Local Government to be a key stakeholder in the development of the Nation Food Plan, and integral to the success of many initiatives listed in the Green Paper.

While Local Government is mentioned throughout the Green Paper, the significant role they play in developing and implementing healthy lifestyle programs; investing in and managing community and transport infrastructure; developing and managing environmental programs; and disposing of waste, as well as implementing broad behaviour changes around waste, are not adequately reflected in the Green Paper.

The Association commends the work involved in the development of the Green Paper, but would like to see more emphasis on the role Local Governments currently play, and their role in the solution to the issues identified.

The Association looks forward to being involved in the future development of programs and initiatives to build a more sustainable food system in Australia.

## 1 A National Food Plan for Australia

### 1.1 Why develop a National Food Plan?

***'This is the first time a whole-of-food-system approach to policy has been undertaken by the Australian Government, and it is expected the discussion between all levels of government, industry and the community on food issues will continue to evolve'* p. 21**

The Association is supportive of the development of a National Food Plan and commends the Australian Government for the work undertaken to date.

The Association, through the Municipal Waste Advisory Council (MWAC), previously provided a short submission to the Issues Paper, focusing on the need for food waste to be included in the 'whole-of-food-system' approach to effectively 'close the loop'. The Association is disappointed that food waste has not been included as a step within the 'whole-of-food-system' included in the Green Paper.

Considering the role of Local Government as a key stakeholder, there is an expectation that the Association and its member Local Governments will be consulted regarding the development of initiatives outlined in the Green Paper, as well as the White Paper itself, to ensure that concerns of Local Governments, and their communities, are sufficiently represented.

#### Consultation Question:

***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?***

Yes. The Association supports the approach taken.

## 2 Australia's food system

### 2.1 Introduction

***'The food system can be described as comprising four sets of activities: (i) producing food, (ii) processing and packaging food, (iii) distributing and retailing food, (iv) and consuming food'* p. 25**

The Association recommends that food waste be included as step (v) in the food system identified.

### 2.4 Policy drivers and outlook to 2030

***'The rate of obesity prevalence and its potential health and fiscal implications are also a significant long-term concern for individuals and governments. Based on past trends and no effective interventions, 83 per cent of men and 75 per cent of women aged 20 years and over in Australia could be overweight or obese by 2025... This predicted increase is expected to significantly affect Australia's disease burden and healthcare costs, mostly due to an increase incidence of type 2 diabetes, which is expected to become the leading disease burden by 2023...'* p. 35**

The Western Australian Government has recently released the Draft Western Australian Health Promotion Framework which seeks to address preventative chronic diseases and injury. The Health Promotion Framework identifies Local Government as a major stakeholder in bringing about change

in the community. Health promotion strategies currently implemented by Local Governments include: addressing disability access; tobacco control; road safety initiatives; community safety and crime prevention; and physical activity. The availability and standard of strategies and services, however, differ from Local Government to Local Government depending on available funding, staff resources, infrastructure, and population base.

The Association sees a role for the Federal Government in taking the lead in reducing the prevalence of obesity and avoidable chronic diseases, to ensure consistent messaging across Australia.

***‘Overall, Australia’s economy has experienced a decline in productivity growth during the mining boom of the last decade and investment growth has been flat in non-mining sectors of the economy... Reduced productivity growth has on going implications for businesses and policymakers and, if not arrested or reversed, may reduce wealth and growth opportunities for individuals and businesses in coming decades’ p. 41***

The Association believes that a more sustainable approach to food policy development will result in the best outcomes for producers and consumers. Consistent investment in agriculture and other food production industries will ensure greater food security and the longevity of the local industry itself, through boom time and bust.

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

#### **3.3 Shaping food policy – strategic framework for the National Food Plan**

***‘The government is keen to continue its active partnership with the food industry and regional communities, recognising the need to tailor national policy responses in some cases to address local issues and to ensure local communities are empowered to contribute to informed regional policy’ p. 50***

The Association commends the comment that conditions vary greater across the nation, and that specific local solutions need to be investigated to ensure a sustainable food system. There is an expectation that Western Australian Local Governments and their communities will be involved in the development of tailored solutions.

#### Consultation Questions:

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?*

Yes.

3.2 *The Australian Government is seeking feedback on a number of alternatives to improve leadership and stakeholder engagement on food policy issues. 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?*

Local Governments are supportive of more inclusive consultation processes that extend further than the current COAG structure/representation.

## 4 Australia's food security

### Summary

***'Food security is critical to meeting our aspirations for improved quality of life and health outcomes. Key elements of food security are the physical availability of food, economic and physical access to food, and appropriate use (utilisation) of food. Food security also includes the capacity or resilience of the food supply chain and the community to respond to and recover from short-term disruptions to the food supply' p. 55***

In addition, the Association would like to add that an inherent part of the success of any food system is the safety of that food to the consumer. Safety is used in this context to mean the elimination or marked reduction in the risk of physical harm to consumers through the consumption of that food. The "Paddock to Plate" concept should be fully supported and incorporated. Public Health must be considered at every stage of the food system.

### 4.4 National food security

***'The Australian Government maintains a broad awareness of, and interest in, land use changes, including those that affect the nation's agricultural and food production industries. However, decisions about land use planning primarily rest with state and territory governments' p. 67***

The Association is disappointed to see that the National Food Plan Green Paper does not take the opportunity to comment specifically on what role the State and Territory Governments Planning systems can play in securing Australia's food security. It was expected that more detailed comments would have been provided, particularly in regard to the Australian Government's vision for the protection of agricultural lands; fragmentation of land; competing agricultural land uses; the role of peri urban areas; and, possible ways to manage urban encroachment.

The Green Paper does not provide the State or Local Governments with any specific direction when considering the regional planning for agricultural areas, which could result in a greater fragmentation of land uses throughout the State, in conflict with the broad objectives of the National Food Plan.

***'The government is confident that mining and farming can coexist without affecting Australia's food production capacity but recognises land use planning is a significant policy issue that must be considered carefully' p. 67***

An assessment of the various strategic planning frameworks for rural land uses for each State would have been beneficial, rather than simply adding that 'land use planning is a significant policy issue that must be considered carefully'. It is recommended that the National Food Plan provide some commentary on what role the State and Territories planning systems can play in supporting the National Food Plan, including broad objectives that could be considered by the individual States and Territories when developing their strategic planning documents guiding the future development of each State.

### 4.5 Continuity of supply during emergencies

***'The Australian Government provides funding through the Natural Disaster Relief and Recovery Arrangements (NDRRA)... to state and territory governments to help pay for natural disaster relief and recovery costs...' p. 80***

The Association recently ran a series of workshops throughout Western Australia focusing on the issues Local Governments are currently facing in delivering their Emergency Management responsibilities. The NDRRA (or WANDRRA) arrangements came up at a number of workshops.

Specifically, there is a concern about the time it takes for Local Governments to be reimbursed after providing assistance during an emergency event. For many Local Governments, delays can severely impact on their budgets. This is not a sustainable system moving forward, and the Association expects that the payment process be reviewed.

Another issue raised in regard to NDRRA is the limited definition of an emergency that decides whether or not the funding can be accessed. Due to the increase in emergency events that Local Governments in Western Australia have faced recently, many are under financial strain as their ability to access funding to support recovery activities is limited.

***'Other factors that could impact on response effectiveness include lack of individual and community preparedness; lack of coordination and communication within the food industry; non-food safety regulatory impediments; and limits on the capacity and willingness of the industry to respond' p. 81***

The Association commends the Federal Government for its significant investment in building community resilience through its Natural Disaster Resilience Program. For Western Australian Local Governments, however, this is the only funding currently available for these initiatives. To build Local Government capacity and community resilience, significant recurrent funding must be made available.

***'In some overseas examples, local governments have undertaken campaigns to improve the range of food in local shopping centres. The Australian Government see value in these and other strategies, such as improved public transport, to increase access to quality food for residents of disadvantaged areas but notes these are matters for state and local governments' p. 86***

The Association believes that it is the role of State Government to ensure that access to quality food is consistent across the State. There may be an opportunity for Local Governments to identify local issues or concerns, but the coordination role must sit with State Government.

#### Consultation Questions:

4.1 *Do you agree with the analysis that, broadly speaking, Australia is food secure?*  
Yes.

4.2 *The Australian Government is seeking feedback on the option of working with State and Territory Governments and the food industry to mitigate risks and maintain continuity of the food supply in a major emergency. Do you have specific suggestions for other options or strategies?*

#### *Options for consideration (section 4.5):*

- *building community and household preparedness by contributing to an education and awareness campaign that increases community and household resilience*  
The Association is supportive of this suggestion. This campaign should be developed in partnership with the relevant State agencies.
- *encouraging and enhancing communication and coordination with the food industry to enable it to continue to be the 'lead agent' responsible for continuity of the food supply in the event of an emergency*  
Support.

- *increasing awareness of food supply chain vulnerabilities and improving communication and coordination with the food industry*  
Support.
- *addressing any non-food safety regulatory impediments to the food industry ensuring continuity of the food supply in the event of an emergency*  
Support.
- *exploring development of an agreement for government to reimburse industry for certain costs related to responding to certain national emergencies*  
Support.
- *developing and enhanced national arrangements for the Australian Government to support and assist industry affected jurisdictions to maintain orderly and fair distribution of food. Such options would extend the traditional role of the Australian Government.*  
Support.

4.3 Do you agree with the analysis of the factors that contribute to individual food security?

Yes.

## 5 Safe and nutritious food

### 5.3 Diet and nutrition

***'The regulatory environment needs to remain comprehensive and effective, without being unduly burdensome on industry'* p. 93.**

While the Association agrees that the regulatory environment must be comprehensive and effective, there is some concern regarding the definition of 'burdensome'. The regulatory environment must be appropriate, and should not depend on whether industry thinks it is burdensome or not. The long-term health costs should not be influenced by economic benefit to industry.

***'Consumer preferences are changing and people are seeking more information about the food they are eating. Consumers need to be better informed to help them make healthy food choices. Along with the government, the food industry has a key role to play in addressing health-related messages'* p. 94.**

Healthy food messages should be simple, consistent and regulated. There are many examples of misinformation in regard to nutritional information on food packaging. This should be addressed in the National Food Plan whether or not a national nutrition policy is developed.

***'The Australian Government proposes to continue to... develop a national nutrition policy to identify, prioritise, drive and monitor nutrition initiatives, based on important public health and nutrition issues'* p. 105**

This is highly commendable. It must also be ensured that the extensive evidence related in Chapter 5 is incorporated into every decision made regarding the seven outcomes on page 2 of the National Food Plan and not seen as a separate issue that will only be addressed when the nutrition policy is developed.

### Consultation Questions

*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*
- *reformative 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.*

*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?*

In regard to the issue of safe food, it is proposed that the Australian Government work with the States and Territories to investigate the existing food safety programs being provided within the various school curriculums, with a view to preparing a best practice model for all jurisdictions to consider implementing.

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

### **6.9 Infrastructure**

***'Efficient infrastructure is vital for Australia's economic activity and productivity growth. Various types of infrastructure, public and private, are important for the food industry' p. 183***

Western Australia has seen policy reforms that have shifted the agricultural freight task (both inputs and outputs) from rail to road resulting in a shift in responsibilities for State to Local Governments. Unfortunately, the Local Government road network is deteriorating (there is a gap of around \$150 million per year between actual expenditure and that required to maintain the network in its current condition) and almost the entire shortfall in expenditure is in agricultural areas. The increase road traffic due to recent policy decisions will continue to have a negative impact on local roads.

The challenge for Western Australia is that around 95% of the grain produced in the State is exported, and has limited impact on domestic food sources. Ensuring that the Western Australian market remains competitive is paramount.

***'Almost two thirds of the Nation Building Program for transport infrastructure will be allocated to projects in rural and regional communities. This will assist in reducing barriers between farms, factories and national and international markets' p. 184***

While the National Building Program (NBP) represents significant investment in transport infrastructure across Australia, the NBP only deals with the major transport links between capital cities and between capital cities and regional centres. The NBP does not address the so called "first mile" issue when agricultural products are entering the supply chain. The "first mile" roads are all Local Government roads. Any serious attempt to deal with the supply chain for agricultural products must consider the first mile.

## 7 A strong natural resource base

### 7.4 Food waste

***‘Recognising the complex issues surrounding waste (including food), the National Waste Policy: Less Waste, More Resources, sets Australia’s waste management and resource recovery direction to 2020. The National Waste Policy updates and integrates Australia’s policy and regulatory frameworks, setting the direction to produce less waste for disposal and manage waste as a resource to deliver economic, environmental and social benefits’ p. 213***

The Association commends the Australian Governments ‘National Waste Policy’. The Association currently represents Local Government on a number of working groups, and would like to emphasise that Local Governments are also involved in implementing various initiatives under the National Policy, and that it is not limited to Federal and State Government involvement.

Unfortunately, funding for the National Waste Strategy is limited, and will greatly impact on the overall effectiveness of the proposed initiatives. The Association recommends that funding for waste reduction and diversion from landfill initiatives be increased.

While the Green Paper holds the National Waste Strategy up as the key area where the Federal Government is addressing food waste, the National Waste Policy only has a limited focus on reducing food waste. The Association recommends that the focus on food waste be strengthened in both the Green Paper and the National Waste Policy.

***‘The South Australian, Victorian and Queensland governments have in place waste strategies that aim to reduce waste and optimise recovery and recycling through the setting of waste reduction targets’ p. 213***

The Western Australian State Government has also developed a waste strategy: *Western Australian Waste Strategy: “Creating the Right Environment”*. The Western Australian strategy includes diversion from landfill targets. These targets differ from waste reduction targets which aim to reduce the amount of waste that is generated, and involves educational initiatives such as the programs mentioned in the Green Paper. Diversion targets, on the other hand, aim to reduce the amount of waste generated from landfill.

The Association, questions the effectiveness of the waste strategies mentioned, particularly the effectiveness of strategies with limited funding to make the necessary changes. Due to the change in government in Queensland after the development of the Strategy, a number of initiatives have been removed including the landfill levy itself. South Australia is currently operating under its second Strategy and show significant successes. South Australia, however, do have significant resource recovery infrastructure in place, and an effective Container Deposit Scheme. In South Australia it is also a regulatory requirement that waste undergo a resource recovery process prior to disposal. There are also a number of Local Government who provide a food waste recycling service to their residents as a result of a pilot program established in 2010.

In Western Australia, limited funds have been made available to support Local Governments and the waste industry invest in better processes and technologies to reduce and divert waste from landfill.

***'No single approach can address all food waste issues as there are numerous sources and effects throughout the food system. Despite the heightened awareness of issues surrounding food waste, and its renewed emphasis in relation to global food security, there is a need to understand the complex issues underlying food waste, including knowledge, attitudes and behaviours associated with food waste'* p. 213**

The Association believes that it would be useful to list the constraints on reducing food waste in the Green Paper. Listing the various constraints could assist in identifying solutions. Constraints could include legislative restrictions on donating food that is no longer fit for sale; consumer expectations of what food should look like; packaging size and design; consumer consumption patterns; and, lack of funding for a national food waste avoidance program.

In addition, there are a number of constraints involved in collecting and treating food waste, such as the significant cost of Alternative Waste Treatment (AWT) facilities; expensive processing and collecting costs; the process for gaining planning approvals for AWT facilities can take a number of years; and, difficulty of guaranteeing long term waste supply contracts for AWT facilities.

Another constraint is the legislative inequalities for different types of compost. For example, the approach to regulating the contents of compost and where/how much can be used differs between compost from municipal waste and other sources such as fertilisers and organic materials (biosolids). A possible method of ensuring that there is equitable enforcement of regulations on compost from municipal waste and biosolids would be to place the responsibility for enforcement with agricultural departments instead of environmental regulators as is currently the case in Western Australia.

***'State and territory government landfill levies applied to organic waste also help reduce the amount of food waste that goes to landfill and thus landfill gas emissions'* p. 215.**

The Association questions the assumption that landfill levies are effective in reducing waste to landfill. The Association has recently undertaken a study comparing the different landfill levies across Australia, and there does not appear to be any clear link between an imposed landfill levy (and in particular, a landfill levy with a higher price per tonne of waste) and a reduction in the amount of waste disposed to landfill. One reason for this, however, is that there is usually a long lead time to develop the infrastructure needed to defer waste from landfill, and at the early stages of landfill levy implementation landfill is still the only disposal option available.

The implementation of the landfill levy in Western Australia has resulted in a number of unforeseen consequences. For example, some Local Governments absorbed the increase costs of waste disposal to reduce the financial impact on residents. This meant that the overall investment in waste was reduced due to reduced revenue. The Southern Metropolitan Regional Council (SMRC), for example, generates approximately 40,000 tonnes of residual waste from its AWT facility per year. This material is sent to landfill and therefore attracts a levy. The impact on SMRC's 2010/11 budget was an additional cost of \$800,000. To minimise costs to Member Councils and residents, the SMRC had to cancel its research and waste auditing program.

### Consultation Questions

*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?*

The Association suggests the following initiatives for consideration:

- Introduce an initiative to promote sustainable farming/fishing at the property level. Trained staff would work with farmers to identify suitable land uses for the different areas of their property. Farmers may be able to intensify production in some parts of their property, while retiring other less suitable areas back into native vegetation. This initiative is called “whole farm planning” and is currently carried out in New Zealand. It is implemented by regional councils and funded by central government. See <http://www.horizons.govt.nz/managing-environment/sustainable-land-use-initiative-slui/whole-farm-plans/> for more information.
- Make nutrient budgeting a compulsory part of fertiliser use to prevent eutrophication of waterways. OVERSEER® is an example of a computer model available to assist farmers with nutrient budgeting. It examines nutrient use and movements within a farm to optimise production and environmental outcomes. The computer model calculates and estimates the nutrient flows in a productive farming system and identifies risk for environmental impacts through nutrient loss, including run off and leaching, and greenhouse gas emissions. OVERSEER® produces a nutrient budget which is a summary of all nutrient inputs and outputs from a farm or block within a farm. The model provides the means to investigate alternative farm management options to improve the efficiency of nutrient use so as to optimise production and reduce the risk of adverse environmental impacts. Overseer Nutrient Budgets provides for pastoral and cropping (fruit, vegetable and arable) farms. For more information see <http://www.overseer.org.nz/Home.aspx>

*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?*

- Create a system where producers can earn an environmental tick, similar to the heart foundation tick (<http://www.heartfoundation.org.au/healthy-eating/heart-foundation-tick/pages/default.aspx>) or the FSC certification tick (<http://www.fscaustralia.org/get-involved/become-fsc-certified>). This would provide a transparent and robust signal to consumers, giving them assurance that they are buying food produced under environmentally sustainable practices. As it currently stands, food labelling can be unclear or misleading. Approval from a respected third party would improve this.
- Improve public awareness about food miles and carbon foot printing. UK’s Tesco calculates the carbon footprint of foods, and has a business strategy to become a zero-carbon business. Large Australian supermarkets would follow suit if there was a public awareness and demand for it. For more information about Tesco’s business plan see <http://www.tescopl.com/index.asp?pageid=104>

*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?*

- As waste is a covered sector under the Carbon Pricing Mechanism and consequently raises funds which are used to reduce Australia’s total carbon emissions, there is a need for

specific funding that supports this sector to reduce carbon emissions, for example, through the Clean Energy Futures Package. Placing a price on the emissions from landfill is unlikely to be a sufficient driver to increase investment in food waste diversion projects such as AWT facilities. To bring the cost of AWT's into perspective, capital costs for an AWT composting facility can be as much as \$100 million. Local Governments have previously found it difficult to secure this level of capital investment. Without additional investment by the Federal Government, it is likely that waste management operators will pass on the costs associated with the carbon price to customers, resulting in limited behaviour change.

- Aside from the need for direct funding, an indirect opportunity exists to fund the diversion of food waste from landfill under the Carbon Farming Initiative (CFI). However, for this opportunity to be realized, approved methodologies are required that can be used to generate carbon offsets from waste. As of September 2012, the approved methodologies focused on *the destruction of methane generated from manure in piggeries, environmental plantings and savannah plantings* and the *capture and combustion of methane from landfill legacy waste*. These methodologies do not capture emissions from putrescible waste that will be generated in the future. There are a number of initiatives that can be used to reduce the carbon impact of waste, for example sequestering carbon directly in soil. A number of Local Governments invested heavily in AWT technologies as a means of diverting organics from landfill prior to the introduction of the carbon price. Unfortunately, AWT facilities are unable to generate carbon offsets (as a result of applying the carbon price to waste). This has effectively penalised the Local Governments that have invested in these technologies, and reduced the incentive for further investment in waste diversion initiatives. Therefore, there is a need for other approaches under the CFI that recognise the valuable contribution of these facilities in relation to carbon reduction as a result of waste diversion from landfill.

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

The Association generally agrees with the concepts outlined in this section.

## **9 Global food security**

The Association generally agrees with the concepts outlined in this section.