



**CONSERVATION
COUNCIL** ACT REGION

Submission to ACT Government (EPSDD): Capital Food and Fibre Strategy Discussion Paper

February 2022

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

For further information please contact:

Helen Oakey, Executive Director, director@conservationcouncil.org.au.

Introduction

The Conservation Council ACT Region welcomes the opportunity to provide brief feedback to the ACT Government regarding the Capital Food and Fibre Strategy Discussion Paper.

In 2015, the Conservation Council ACT Region commenced a community discussion about a sustainable food policy for the ACT. In 2016, the Council released the ACT Region People's Food Plan Working Paper¹, which identified many of the opportunities and obstacles to growing the local food production sector in the ACT and region, and outlined a raft of policy options which, combined, could facilitate better outcomes for locally and sustainably sourced food. This submission does not seek to repeat the content outlined in that paper, and we would recommend it as background reading for the ongoing development of the Capital Food and Fibre strategy.

The Conservation Council ACT Region supports the vision and goals outlined in the Capital Food and Fibre Strategy Discussion Paper, in particular, the ambition to;

- Transition to ecologically sustainable food and fibre production supported by strong environmental stewardship to ensure our region has healthy soils, water and air.
- Build the drought and climate change resilience of the ACT farm sector by identifying and encouraging practices that best fit the region's conditions.

We would like to take this opportunity to outline some key considerations for further development of the plan, namely, the meaning of the term 'ecologically sustainable', availability of land to fulfil the strategy's objectives, the consideration of a Protected Areas Network (PAN), and the importance of ongoing community consultation.

¹ ACT Region People's Food Plan, Conservation Council ACT Region, May 2016:
<https://conservationcouncil.org.au/wp-content/uploads/20160510-Towards-an-ACT-Region-Peoples-Food-Plan.pdf>

Defining 'Ecological Sustainability'

Prioritising ecological sustainability in food and fibre production is critical to the success of the Strategy, as recognised in Goal 1. The world is currently facing dual environmental crises, the biodiversity crisis and the climate crisis.² Food and fibre production has the potential to exacerbate these issues, and be undermined by their effects. For example, agriculture and associated land clearing releases approximately 115 million tonnes of greenhouse gas into the atmosphere per year.³ Agriculture is also the largest contributor to biodiversity loss in the world.⁴ Considering this, recognition of ecological sustainability as a key concept in the Capital Food and Fibre Strategy is strongly supported.

In order for the Capital Food and Fibre Strategy to adequately promote ecological sustainability, it must be sufficiently defined in the policy. The Discussion Paper fails to do this, only outlining factors of “healthy soils, water and air”.⁵ Key factors for ecological sustainability that must be considered in the Strategy include:

- Facilitating connectivity of native habitat across the landscape;
- Restoring degraded pastoral areas;
- Rehabilitation of natural watercourses including exclusion of livestock;
- Management of invasive species;
- Ongoing financial and social viability of environmental stewardship programs;
- Climate adaptability including species selection;
- Managing greenhouse gas emissions and long-term carbon sequestration;
- Responsible use of water particularly for irrigation;
- Avoiding the use of toxins (pesticides, herbicides, fertilisers etc.);
- Incorporating principles of regenerative agriculture and circular economy;
- Recognising opportunities for co-benefits (e.g. energy recovery from livestock, grazing for weed management, social inclusion in crop harvesting).

Monitoring and Review

Under guiding principle 7, the Strategy should facilitate monitoring and data collection of key sustainability indicators. This may include soil, water, and air quality monitoring as indicated in the strategy, but must not be limited to these parameters. Additional monitoring should be undertaken to survey landscape and ecosystem health, and connectivity values. This data should be made publicly available and reviewed on an ongoing basis.

Recommendations

- Define the meaning of 'ecologically sustainable' and identify factors that are intrinsic to this concept.
- Facilitate monitoring and data collection of key sustainability indicators, not limited to, soil, water, and air quality.

² IPBES-IPCC, Co-Sponsored Workshop Report on Biodiversity and Climate Change, 2021.

³ Climate Council, Agriculture's Contribution to Australia's Greenhouse Gas Emissions, 2021.

⁴ Nigel Dudley & Sasha Alexander, *Agriculture and biodiversity: a review*, 2017.

⁵ Capital Food and Fibre Strategy 2021, p8.

Planning for the expansion of the food production sector

As identified in the Discussion Paper, “agricultural land occupies about 15% of the ACT.”⁶ However, as also alluded to, this area is set to significantly decrease with the expansion of Canberra’ urban footprint to accommodate population growth over the next decades. Already the ACT Government is scoping another 9800ha of land to the west of Canberra⁷ for the purposes of establishing the ACT’s next big urban development. This land includes former and ongoing rural leaseholds which have now been identified as ‘future urban areas’. In addition, the ACT Government is still finalising plans for the area captured in the Eastern Broadacre Study - an area that is already home to several agricultural endeavours. While both of these areas have significant environmental values - less clear as yet on the western edge - proposals for development in both areas are likely to reduce the amount of land that might be available for agricultural purposes. Currently the ACT Government has identified the Easter Broadacre “as a potential future employment, industrial and related uses corridor” while acknowledging that some agricultural purposes might be consistent. The Western Edge has loosely been identified as a potential future urban area.

The direction of the ACT’s urban expansion policy risks being fundamentally opposite to the direction this paper is outlining. Increases in population will only increase the demand for food and fibre, while concurrently reducing the land available to produce locally grown food. While some food production can occur within the urban footprint, the scale of food production required to significantly reduce the ACT’s reliance on external food sources would require a substantial allocation of land. This strategy risks being fundamentally undermined by the future plans for population growth and future urban and commercial development.

Recommendations

- That the ACT Government embed the principles of the Food and Fibre strategy into its high level planning strategy and prioritises the designation of appropriate land on the urban edge for the purposes of food production.

Consideration of a Protected Areas Network (PAN)

A PAN is a layer of protection that falls across an entire jurisdiction, regardless of tenure, for the purpose of protecting natural values. It enables biodiversity conservation to occur where it is needed most. Designating an area as part of a PAN does not necessarily preclude the broader use for other purposes such as agriculture, but it does ensure that areas of high conservation value are protected.

A PAN should be considered in conjunction with the Food and Fibre Strategy as a mechanism to facilitate ecological sustainability. Not only could it result in improved environmental outcomes, but also align with other sentiments expressed in the Discussion Paper such as,

⁶ Page 13, Capital food and Fibre Strategy Discussion Paper, 2021.

⁷ Western Edge Investigation -

<https://www.planning.act.gov.au/planning-our-city/planning-studies/western-edge-investigation>

incorporating Aboriginal partnerships and knowledge, providing economic savings, and meeting community expectations.

Implementing a PAN in the ACT would require formal protection mechanisms, an application of conservation management across all the lands deemed of conservation value, and the appointment of a liaison and support team to monitor land management and provide support to stakeholders, particularly rural lessees. These actions should be undertaken in conjunction with the Food and Fibre Strategy in order to support its goals, as well as meet other Government and legislative commitments, such as the ACT Government's commitment to provide "a healthy natural environment".⁸

Recommendations

- Consider implementing a PAN alongside the Food and Fibre Strategy to facilitate ecologically sustainable food and fibre production.

Community Consultation

We commend the ACT Government for releasing the Capital Food and Fibre Strategy Discussion Paper for public consultation, and for their commitment to co-design as stated in the guiding principles. The Discussion Paper is a positive starting point for community dialogue, however, further consultation will be required throughout the drafting process, as the Discussion Paper is insufficiently detailed to enable robust engagement. For example, it suggests that environmental stewardship will be a key consideration relating to the first goal outlined in the Discussion Paper, but does not suggest any ways in which such stewardship may be facilitated.⁹ Ongoing consultation should be conducted through both public mechanisms, and targeted stakeholder discourse. Stakeholders should be sought from all sectors particularly, environmental conservation.

Recommendations

- Conduct further community consultation to promote discourse in reference to specific actions under the Strategy.

⁸ ACT Government, *Parliamentary and Governing Agreement of the 10th Legislative Assembly*, 2020.

⁹ Capital Food and Fibre Strategy 2021, p9.