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AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE

**Submission to the Draft State Planning Policies (July 2018) for
South Australia**

21 September 2018

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Australian Food Sovereignty Alliance

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About the Australian Food Sovereignty Alliance (AFSA)

The Australian Food Sovereignty Alliance (**AFSA**) is a farmer-led collaboration of organisations and individuals working together towards a food system in which people can create, manage, and choose their food supply and distribution system. AFSA is an independent organisation and is not aligned with any political party. We have more than 700 individual, organisational, business, and farm members.

In 2014 we established a producers' branch of AFSA, Fair Food Farmers United (FFFU) to provide a balanced voice to represent farmers and advocate for fair pricing for those selling to the domestic market, connect Australian farmers for farmer-to-farmer knowledge sharing, and to be a voice for farmer-friendly regulations and standards.

We are part of a robust global network of farmer-led organisations involved in food security and food sovereignty policy development and advocacy. We are members of the International Planning Committee for Food Sovereignty (IPC), Urgenci: the International Network for Community-Supported Agriculture, and La Via Campesina – the global movement of peasant farmers, and we have strong relationships with Slow Food International and its Australian chapters. We also provide support for the Australasian representative on the Civil Society Mechanism (CSM), which relates to the Committee on World Food Security (CFS).

We work extensively with primary food producers and consumers across every state and territory in Australia. Our committee has consisted of published academics and lecturers from the University of Melbourne, RMIT, Deakin University, University of Tasmania, University of Sydney, and QUT. We have also had representation from farmers from every state, and local advocates and campaigners such as Food Connect, Friends of the Earth, Regrarians, Fair Food Brisbane, and the Permaculture Network.

Our vision is to enable regenerative farms to thrive, and for all people to have a choice in what they eat.

Australians increasingly care about the way their food is produced, including its social and environmental impacts. They seek out food that is grown locally and without damage to the environment. Food produced on small regenerative farms is in strong demand, and we believe that it is critical that government heeds changing community expectations and facilitates, supports and encourages the growth and viability of regenerative agriculture while protecting the environment and human and animal health.

Background

For the first time in more than 20 years, South Australia (SA) is undergoing a major overhaul of its planning system to modernise it for the next 30 years.

As part of the new planning and development system being introduced in SA, the State Planning Commission has prepared draft State Planning Policies that will set a clear vision and priorities for SA's future.

The draft State Planning Policies are a key instrument in this modernisation, the scope of which is described in the new *Planning, Development and Infrastructure Act 2016*.

These policies are the highest level of policy in SA's new planning system. They outline matters of importance to the state in land use planning, development and design and provide a state-wide framework that aims to enhance SA liveability, sustainability and prosperity.

Importantly, the policies consider changes to how and where South Australians live and work; current and future trends in population growth; climate change; and other social and economic drivers.

SA's planning system also unique for its Environment and Food Productions Areas (EFPAs), which were introduced in 2016 to protect valuable food producing and rural areas from urban sprawl and subdivision of land, as well as to conserve landscapes, tourism and sustainable urban growth. Significantly, in these areas (largely primary production land and Rural Living Areas) food and wine producers are given more certainty in terms of the direction of the SA planning and development. SA's planning scheme already protects other rural areas (of significant character) under the *Barossa Character Preservation Act 2012*.

The SA Department of Planning, Transport and Infrastructure (DPTI) has released the consultation documents to the public, but the Draft State Planning Policies were prepared by the SA State Planning Commission on behalf of the Minister for Planning, the Honourable Stephen Knoll MP.

The State Planning Commission is an independent, principle planning body providing advice and leadership on all aspects of planning and development throughout SA. The Commission is also the state's principal development assessment and planning advisory body. The State Planning Commission guides decision-making of state government, local government and community and business organisations.

Since its establishment in 2017, the Commission's role is to act in the best interests of all South Australians, promoting the principles outlined in the *Planning, Development and Infrastructure Act 2016*.

The Commission's vision for the State Planning Policies is to provide greater direction, clarity and efficiency in SA's planning system and to help develop and protect urban, regional and rural resources.

AFSA is aware that the draft State Planning Policies represent the vision of the State Planning Commission and DPTI and are considered high-level reform statements rather than a detailed proposal for provisions. We are also aware that in 2019, consultations will commence in relation to SA's Planning Design Code. We look forward to participating in future consultations relating to changes to food and agriculture policies.

AFSA's concerns for the proposed reforms

Consideration for agricultural land needs to be core to the reformed SA State Planning Policies if we are to have a food secure future.

We aim to direct policymakers to ensure that planning provisions place less unnecessary burdens on low-risk farms, because these sorts of policies make farming unviable and add to the administrative burden on local councils.

As a result of the announcements to reform the Victorian planning provisions and the New South Wales' (NSW) state planning controls, concerned organisations and individuals from across Australia have banded together and successfully lobbied for significant changes to the proposed regulations in Victoria. These included dozens of farmers, farmers' markets associations, councils, individuals, food alliances, food certification bodies and environmental organisations.

We would encourage the Honourable Stephen Knoll to engage with AFSA to ensure new legislation is appropriately drafted to protect the growing small-scale farming sector.

Planning Reforms in Victoria & ASFA's Campaign

In 2017, AFSA mobilised its members and partnered with other organisations across the state such as Slow Food Melbourne, Open Food Network, and the Victorian Farmers Markets Association, which led to an unprecedented 270 submissions made to

Agriculture Victoria late last year calling for scale-appropriate, risk-based planning provisions.

AFSA's concerns over the impact of proposed reforms in Victoria on small-scale pasture-based farming were noted by the Honourable Jaala Pulford, Minister for Agriculture and Regional Development, after we made a submission to the draft *Planning for Sustainable Animal Industries*.¹ As a result of our efforts, the Minister instructed her Department to work with us to work through the concerns.

AFSA is now celebrating a win for small-scale pastured pig and poultry farmers – and everyone's access to food grown in ethical and ecologically sound ways – with the Victorian Government's announcement of the long-awaited reforms to the planning scheme.

The reforms acknowledge the very low risk these systems pose to environment and amenity and introduce a streamlined permit application process for low density mobile outdoor pig and chicken farms, with no requirement for referrals to other agencies nor a notice and review period.

While we still maintain that small-scale pastured pig and poultry farms should not have been required to obtain a permit to farm in the Farming Zone, just as their grazing counterparts are not required to, we have accepted this compromise as a way forward to give local councils and communities confidence that our intentions to raise animals responsibly and respectfully are matched by our farming practices.

Up until 2015 small-scale pastured pig and poultry farms were advised by councils across the state that they did not require permits as they were generally considered to be 'extensive' or grazing systems. However, a VCAT ruling in 2015 deemed free-range pig farm Happy Valley as 'intensive' due to importing the majority of the pigs' feed.

The decision triggered a process that has taken three years to address what farmers, councils, and the state government all agreed was an unintended consequence of an imprecise definition.

AFSA hopes this is the first of many amendments to legislation that is hampering the growth of regenerative agriculture across Australia, from scale-inappropriate planning schemes to food safety regulation.

¹ Agriculture Victoria, <<http://agriculture.vic.gov.au/agriculture/livestock/planning-for-sustainable-animal-industries>>.

We are encouraged by Minister for Agriculture Jaala Pulford's announcement last month of the Artisanal Agriculture program, with \$2 million earmarked to support our members in their efforts to grow food in ethical and ecologically-sound ways.

We would encourage the SA DPTI and State Planning Commission to garner support from small-scale, artisanal producers in SA by engaging AFSA in consultation directly.

NSW Planning Reforms & AFSA's Campaign

Earlier this year, the NSW Government released their proposed reforms to state planning controls for NSW rural industries. AFSA has made a commitment to our members to engage with the evolving planning reforms in NSW, including the *Environmental Planning and Assessment Act 1979* (to be superseded by the *Environmental Planning and Assessment Amendment Bill 2017*) and the current reforms to the *Environment Planning and Assessment Regulation 2000* (the **Regulation**). AFSA made a submission² to its review on 24 November 2017 to express our views on the requirements the Regulation places on small-scale farmers whose farms are deemed 'Designated Developments' in NSW.

Key to the State Environmental Planning Policies (**SEPP**) reforms for AFSA's members is that five SEPPs relating to agriculture are being merged into one state policy. This process aims to 'modernise and simplify the planning system.'² The Government has identified that the SEPPs need to reflect modern agricultural practices and support commitments in the [NSW Right to Farm Policy](#).

In NSW, livestock farms, including pig and poultry farms, are already subject to numerous levels of intervention and layers of costs. Many are subjected to Local Land Services inspections and the requirement to hold NSW Food Authority licences for the farming and transport of poultry, along with licencing costs for the processing and storage of meat and the costs and administrative loads involved in the NLIS scheme. This is an existing layer of regulatory and financial burden that exists.

The proposed package of reforms will add to this further by affecting Local Environment Plans (**LEPs**) and will determine when farms require Development Consent, another layer of administrative burden and cost.

² Note that this submission is not available on the website DPE submission page because we submitted by email. Receipt dated: 27 November 2017.

We also look forward to working more closely with the NSW State Government as they work through their planning reforms.

Executive Summary

This response to the proposed SA State Planning Policies and related planning reforms outlines the concerns of our organisation and our members. It will expand on the issues relating to the effects of peri-urban development on farmers whose access to communities via farmers' markets is considerably affected. This submission focusses on the impacts on small-scale, low-density meat, egg and fresh vegetable producers whose commercial viability will be most affected.

We propose these reforms encourage appropriate assessment tools be used for determining requirements for pastured pig and poultry farms. AFSA has created forms that councils and farmers could use to assess the trigger to judge a farm 'intensive' or otherwise. We recommend that, where feeding infrastructure is mobile, a setback from neighbouring dwellings, waterways or 'environmentally sensitive areas' be set at no more than 20m. The Government should also identify suitable resources in relation to planning compliance. We recommend that it develop Codes of Practice in close consultation with small-scale pastured pig and poultry farmers.

Additionally, regulatory outcomes must be aligned with current industry structure and animal operations in the state. To achieve this, when the Planning Design Code drafting is underway, the Government should urgently prepare a regulatory impact statement to effectively devise the reforms.

What AFSA members want

We call on SA Planning Minister, the Honourable Stephen Knoll, DPTI and the State Planning Commissioner to improve access to genuine free-range meat, a growing consumer market, as access will become harder as small-scale pastured livestock farmers cease to grow under the pressures of unfair planning schemes.

We want the reforms to address diminishing access to processing facilities. SA, the 'Great Wine Capital of the World', could see the demise of the very farming systems that underpin the diversity and quality of produce for which the state is famous.

Our farming members want to establish viable farming operations on small acreage properties. Preventing small-scale producers from setting up such businesses will have a follow-on impact on local employment opportunities both on farms and in value-adding industries.

We want to see regenerative farming become the new normal, with care for soil, water, animals, farm workers, and eaters at the core of our farming practices, but for this to happen, we need governments to shift their policy focus from supporting industrial agriculture to enabling regenerative farming.

List of Recommendations

Recommendation 1: Take learnings from the Victorian planning reforms relating to Planning for Sustainable Animal Industries and directly consult with AFSA in SA's future Planning Design Code consultation process.

Recommendation 2: Foster food security and strengthen efforts to identify 'Food Sheds' by consulting with Councils and taking into consideration research in relation to peri-urban planning (refer to our Submission to the NSW State Environment Planning Policies – Primary Production and Rural Development).

Recommendation 3: Plan for more flexibility for the construction of dwellings built in support of the agricultural purposes on farms, while maintaining and strengthening guards against converting farms to purely residential, lifestyle properties.

Recommendation 4: Directly consult with small-scale pastured animal producers, small-scale horticulturalists and other artisanal producers to gather data on farmers regarding the size of their farms, species farmed, pasture cover and stocking rates.

The Case for Reform

Animal Industries in Australia

Industrial agricultural methods require further investigation and should be subject to strict regulation.

A growing scientific literature³ demonstrates that the high-density housing of genetically-cloned stock, immunologically depressed by breeding and environmental circumstances, in small spaces on the grounds of economies of scale, results in many acute infections—bacterial and viral—within the very environments in which they tend to evolve greater transmissibility and resistance. The sheds ostensibly built to keep disease out are instead the environments in which pathogenic species flourish.

Highly pathogenic strains of avian influenza A H7N4 and H7N7, for instance, have been documented on large broiler and layer poultry operations in Victoria and Queensland since the 1970s. An on-site increase in the virulence of an avian influenza H7N4 strain from low to high pathogenicity was documented on a large commercial broiler-breeder operation of 128,000 birds.⁴

It is the concentration, scale, and throughput of this method of intensive animal production that are driving the new disease ecology, selecting for the evolution of greater deadliness, and increasing the geographic extent of pathogen transmission.

Industrial pigs have repeatedly suffered disease outbreaks in Australia, including atrophic rhinitis, *Actinobacillus pleuropneumoniae*, *Haemophilus parasuis*, *Pasteurella multocida*, porcine circovirus 2, and swine flu H1N1 (2009). Many such acute pathogens can persist, and spread across multiple regional farms, only under intensive industrial models of production.⁵

The key difference between highly industrial models and the agroecological small-scale farms AFSA members manage is highlighted in this account of the structural differences in how industrial and agroecological farmers heed the signs their land offers them:

High-input methods reduce the need for the grower to pay attention or respond to ecological feedback cycles in the agroecosystem. For example, instead of responding agroecologically to feedback cycles of soil erosion and excessive surface water runoff or leaching by increasing soil organic matter (and thus increasing crop diversity and incorporating forages and green manures), conventional producers are—both structurally and

³ Wallace R.G. and Wallace, R. (eds). 2016. Neoliberal Ebola: Modeling Disease Emergence from Finance to Forest and Farm. Springer, Switzerland.

⁴ D.E. Swayne & D.L. Suarez, 2000. Highly Pathogenic Avian Influenza, Rev. sci. tech. Off. int. Epiz., 19 (2), 463-482.

⁵ Wallace & Wallace, 2016.

rhetorically—encouraged to simply change the nitrogen-phosphorous-potassium balance of synthetic fertilizer application. The result is an agricultural system that is stabilized through significant investments in engineering, infrastructure, and policy, rather than agroecological system knowledge (Berardi et al. 2011).⁶

Scientists have turned their attention to the growth in pastured pig and poultry production and found many ecological and health benefits:

Outdoor pig farming became more popular in the last 20 years with the rise in public interest in animal welfare and products originating from production systems which take care of the environment. It is designed as a system that allows the pigs outside access including contact with soil and growing plants (Honeyman et al., 2001) in which animals can express their natural behavior (Miao et al., 2004). If this production system is coupled with good management practices it can result in acceptable production performance, high quality of pork with superior taste and health benefits for humans due to the high level of unsaturated fatty acids (Simopoulos, 1991) and absence of residues (growth promoters, antibiotics, pesticides) or biological agents (microorganisms, parasites).⁷

Climatic conditions, land size, and soil characteristics are the main factors that must be considered in pastured pig and poultry management. They comprise the management of housing and feeding, including the type of buildings and materials used, space allowance, ground cover, group size, type of feeds and feeding regime, management of mating and disease prevention.

While the greater risks of industrial livestock production are well known, and to a large extent appropriately managed through each Australian state's planning provisions, there is an element of regulatory capture that appears to be growing worse, as evidenced by the current draft planning provisions that would codify what appear to be an inadvertent inclusion of small-scale pastured livestock farming in the definitions designed for high-

⁶ Rotz S. & Fraser E., 2015. Resilience and the industrial food system: analyzing the impacts of agricultural industrialization on food system vulnerability, *J Environ Stud Sci*, 5:459–473.

⁷ Salajpal, Karolyi, Lukovic. 2013, Sanitary Aspects of Outdoor Farming Systems, *Acta agriculturae Slovenica*, Supplement 4, 109–117, Ljubljana.

risk, high-density intensive pig and poultry production.

It is useful to examine an example from overseas that demonstrates what can happen when a well-meaning government responds to a food safety or ecological crisis and enacts legislation that serves to promote industrial food systems while hindering regenerative, localised food production. Significantly, the Canadian authority responded to the public's concerns and a compromise was achieved that protected all scales of farming satisfactorily.

After the BSE crisis hit British Columbia, the Canadian Food Inspection Agency rushed to adopt a highly prescriptive food policy that required all meat slaughter to be conducted at centralized, publically licensed plants. Predictably, this policy served to protect industrial, export-oriented production against global fears of Canadian meat contamination, while enforcing impossibly onerous transport requirements on more rural, isolated, small-scale meat producers. The subsequent rise in concentration of meat production, slaughter, and processing throughout western Canada led to vocal struggles over food safety standards and system vulnerability.

On the one hand, alternative and small-scale producers and advocates contended that, given the large-scale and broad distribution inherent in concentrated industrial production systems, the risk of a widespread outbreak was high (Miewald et al. 2013). Hence, they argued that the shorter geographic distance between farm-slaughter-customer, which small-scale production and direct to consumer marketing provided, reduced risk along the supply chain (ibid). As such, proponents of more local food systems concluded that small-scale producers and their applicable distribution networks should be valued and supported within British Columbia's regulation.

Industrial production proponents, on the other hand, argued that centralized production allowed for more efficient monitoring and surveillance. In the end, the Miewald et al. (2013) study found that by opening up the policy (and the definition of 'risk' within the policy in particular) to include an appreciation for diversity of scale and distribution, both producers and regulators could facilitate flexibility in enforcement and reduce systemic risk within the meat production system. In effect, these amendments helped to build a more nuanced meat inspection policy that appreciated the role that different scales and methods of production and distribution had to play in buffering systemic risk.⁸

As the Canadian authorities recognised, farmers committed to producing healthy, sustainable food for their local communities should have assistance, support and training for the continual transitions inherent to genuinely regenerative forms of production.

⁸ Rotz S. & Fraser E., 2015. Resilience and the industrial food system: analyzing the impacts of agricultural industrialization on food system vulnerability, J Environ Stud Sci, 5:459–473.

Small-scale farmers across Australia are already engaged in agroecological practices that provide nutritious food for their communities while caring for animal welfare, the soil and all other components of their local ecosystems.

In the past, planning reform documents have suggested (erroneously) that risks of outdoor operations are greater than those of indoor operations. In the case of Victoria, however, Department policymakers created a streamlined application process for low-density, low-risk farms after direct consultation with small-scale farmers, Councils and AFSA.⁹

The case for agroecology

Agroecological farming is the application of ecology to the design and management of sustainable agroecosystems¹⁰. Agroecological farmers favour long-term strategies that are flexible and can be adjusted and re-evaluated over time. They aim to diversify production on farm, which creates resilience ecologically, and for farmers and eaters in the face of climate change, but also for shifting market prices¹¹. At the core of agroecology is the idea that the type of farming undertaken must be appropriate for that particular environment.

This farming philosophy has been gaining an increasing following globally as farmers are beginning to seek out more sustainable farming methods. The concept has been endorsed by the Food & Agriculture Organisation of the UN (FAO) as a means to feed growing populations sustainably¹².

The aim is to design complex and diverse agroecosystems for all the individual parts to eventually support and sustain each other to prevent the outbreaks of pests and disease common in mono-culture systems. In practice this means incorporating a range of livestock, grains and plants in ways that minimise external inputs by re-using waste on the farm, spreading out the risk of relying on just one crop, conserving water and looking after the soil¹³.

⁹ Page 20, Draft Planning Guidelines – Intensive Livestock Agriculture Development.

¹⁰ Gliessman, S.R., *Agroecology : the ecology of sustainable food systems*. 2007, Boca Raton: CRC Press.

¹¹ Parfitt, C., et al., *THE PEOPLE'S FOOD PLAN. A common-sense approach to a fair, sustainable and resilient food system.*, in *Working Paper*, C. Richards and N. Rose, Editors. 2013, Australian Food Sovereignty Alliance: Kambah.

¹² FAO, *Final report for the International Symposium on Agroecology for Food Security and Nutrition*. 2015, Food and Agriculture Organisation of the United Nations: Rome.

¹³ SOCLA, *Acroecology: Key Concepts, Principles and Practices*, ed. T.W.N.a.S.C.L.d.A. (SOCLA). 2015, Penang: Malaysia: Jutaprint.

The SA draft State Planning Policies indicate that the reforms will enable the state to recognise the importance of protecting its food-bowl. We encourage the State Planning Commissioner to develop a land use planning framework that is relevant and responsive to industry needs, and that is capable of what it has promised as per State Planning Policy #8:

Objective

A diverse and dynamic primary industry sector making the best use of natural and human assets.

Policies

- 1. Identify and protect key primary production assets and secure strategic opportunities for future primary industry development.*
- 2. Create local conditions that support new and continuing investment in primary industry while seeking to promote co-existence with adjoining primary industries and avoid land use conflicts.*
- 3. Enable primary industry businesses to grow, adapt and evolve through technology adoption, intensification of production systems, business diversification, workforce attraction, and restructuring.*
- 4. Equitably manage the interface between primary production and other land use types, especially at the edge of urban areas.¹⁴*

We note that the SA Planning Policies welcomes diversification in local and regional economies, but the State Planning Commissioner has also stated that diversification will “present a challenge for the planning system to balance economic opportunity for newcomers and innovators with the rights and needs of existing businesses and industries.”¹⁵

We call on policymakers to consider that the long-term gains of supporting regenerative, agroecological farmers as a plan for SA’s future prosperity and ecological health, as a priority over short-term gains through large-scale primary industry value chains. The

¹⁴ South Australia State Planning Policies, <https://saplanningportal.sa.gov.au/_data/assets/pdf_file/0007/478654/Draft_State_Planning_Policies_for_South_Australia_for_Consultation.pdf>.

¹⁵ South Australia State Planning Policies, <https://saplanningportal.sa.gov.au/_data/assets/pdf_file/0007/478654/Draft_State_Planning_Policies_for_South_Australia_for_Consultation.pdf>.

Planning Policies have emphasised that its “agricultural, forestry, fisheries and aquaculture industries are fundamental” to its prosperity and identity. We support the development and cultivation of this identity.

Food Security: Preserving Valuable Land for Farming

Subdivision of Rural Land

We are supportive of South Australia’s 30-Year Plan for Greater Adelaide (the Plan). In particular, we support Plan’s aim to *reduce the incursion of development into productive agricultural and environmentally significant land*.¹⁶ We strongly support the expansion of the EFPAs and hope that Minister, DPTI and the State Planning Commission will continue to preserve and protect food producing and agricultural areas and SA’s primary and premium industries. SA’s support for EFPA’s is expressly stated on SA’s Planning Portal:

“Protecting these areas, in turn, protects our food security, economic growth, local jobs, prized tourism areas and our state’s global reputation as a premium producer of food and wine.”¹⁷

AFSA respectfully submits that the regenerative, agroecological farming movement offers an alternative in which increased population on farms is desirable and supports the purpose of farming as the priority activity. Agrarian intellectual Wendell Berry famously called for a better ratio of ‘eyes to acres’ – that is, *more* people watching and working the land to ensure it is cared for attentively and sustainably.

Former UN Special Rapporteur on the Right to Food Olivier de Schutter has also pointed out that agroecology is ‘knowledge and labour intensive’ – surely welcome considering the potential employment opportunities and slowing of rural-urban migration.

Allowing for multiple dwellings on what would be classified a single farm will aid farmers wishing to practice multigenerational farming. This could allow a smoother transition in the farming population as younger farmers will have the opportunity to live on farm with their own families while they learn by doing. Furthermore, holistic farming

¹⁶ South Australian Department of Planning Transport and Infrastructure, <https://www.sa.gov.au/_data/assets/pdf_file/0017/22166/Reform_of_SA_planning_policy_stage_one.pdf>.

¹⁷ SA Planning Portal, South Australian Department of Planning Transport and Infrastructure <https://www.saplanningportal.sa.gov.au/planning_reforms/new_planning_tools/environment_and_food_production_areas>.

on a single plot of land has the potential to support several families making their living from various farming enterprises that support each other socially and ecologically.

While AFSA strongly supports the need to recognise agriculture as the priority activity in the rural zones, we see a need to offer more flexibility to enable farms to construct suitable dwellings for the rich community of workers needed to manage these systems, where those dwellings are genuinely built in support of agricultural purposes.

Resources for Councils to Administer Increased Regulatory Burden and Regulatory Impact Statement

It has been acknowledged in other states, such as Victoria, that few planners have any real experience and understanding of intensive animal operations. Responsible authorities require guidance to administer the planning system and the Minister must approve of their conduct.

However, the lack of education included in regards to animal industries raises concerns for how well this government action is scoped.

The information provided about the development approval process should be openly sourced so that emphasis on large industry success is part of and not the main aspect of the support. Technical support for investors from animal industry specialists already have flow on effects that inform local government decisions, and these are not all suitable to for all animal operations. Without proper consultation and research, the reforms could serve only a repeat of ‘one-size-fits all’ regulation for animal industries.

A regulatory impact statement should be prepared to require regulators to assess the likely impact of their decision on all stakeholders, including community, developers, farming businesses and individuals. Such a statement would treat the impacts as either regulatory impacts or compliance costs.¹⁸

Ideally, a regulatory impact statement would align industry structure with the regulatory outcomes needed for each type of animal production identified, and yet to be identified, by the Government. Further communication with not only intensive and export-focused

¹⁸ Preliminary Assessment Form Guidance Note, Office of Best Practice and Regulation.

industries but also with communities and small businesses will allow the Government to identify the right programs and resources to educate farmers and regional councils about planning compliance.