property rights australia

Submission to the draft Australian Beef Sustainability Framework

Background

Property Rights Australia (PRA), would have as the largest percentage of its membership enterprises involved in beef cattle production. Because of probable impacts on our members PRA gave priority to being involved in the beef sustainability debate roughly since 2011. PRA was greatly concerned that beef sustainability was not being defined and controlled by the Australian beef supply chain, especially beef producers, rather was being overtly influenced by large multinational food commodity traders and environmental organisations.

PRA has a long history of research of stewardship schemes as promoted by WWF and other environmental non-government organisations (ENGO). We have a huge amount of backup material.

Following the "Beef Squaretable" meeting facilitated by Senators Boswell and O'Sullivan, PRA has largely pulled back from public debate and allowed firstly Jim Cudmore and then the Steering Committee room to conduct their work.

PRA would like to remind the Steering Committee the basic concepts that came from the Beef Squaretable meeting.

Australia is a first world country with a first world reputation in science, innovation and governance. In regards to sustainability there already exists in Australia a high level of legislation, regulation, certification and vendor declaration. There is a need to collate and then to communicate these high standards.

Beef sustainability standards should be developed that are factual to Australian conditions, practicable and attainable.

Australian beef producers should be offered protection from vexatious attacks based on radical agendas. Beef producers should not be forced into further expensive certification schemes.

The Australian beef supply chain should maintain control over the Australian beef industry. The dairy sustainability model is an example of a structure where industry participants keep control of the decision making and a secondary advisory board is offered to interested reasonable external organisations.

Progressing the Draft Framework

PRA would like to assure the steering committee that PRA in no way wants to hinder the progress of a sustainability definition for the Australian beef supply chain. PRA believes the overall issue to be very important and would like to contribute to the process to ensure the framework is practicable and attainable.

There is an obvious large amount of work gone into the preparation of this framework and for that PRA wishes to commend the chair, Prue Bondfield and the members of the steering committee.

PRA believes that the process should not be rushed and full consideration be allowed to the detail as presented in the draft framework.

This submission is focused on the cattle producer end of the beef supply chain.

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Vision

The use of the term "Continually improves" could become problematic. Continuous improvement could put even more of an impost on cattle producers and rural communities many of which often do not have a thriving community, and are bombarded with a plethora of expectations.

Continuous improvement may not always be possible. For example the advancement of knowledge or technology may plateau for a number of years before a breakthrough makes improvement possible. Continuous improvement may not even be necessary in areas where the Australia beef industry is already at a very high standard.

PRA suggests that the term "seek to improve and/or maintain", be used instead of continuous improvement.

This is more practical. Both Federal and State Government use the improve and maintain philosophy in all situations where environmental offsets are concerned. Sometimes, for a plethora of reasons, improvement will not be possible or practical, however it may be much more practical to maintain what is already in place, and then improve as knowledge improves.

Suggested alternative: **A thriving Australian beef industry that supports the economic and social wellbeing of people; the health of animals and the environment, while seeking to improve and/or maintain sustainable management practices**

Sustainability Definition

PRA has observed that the word sustainable is again being understood with a more holistic meaning where economic and social sustainability are being recognised alongside environment. This is most welcomed because for a period of time sustainable was defined in environmental terms only, devoid of any measurable criteria, allowing the goal posts to be shifted. The image was created of a pristine environment and agriculture, an unworthy participant.

The lesson is that the beef industry should provide a sustainability definition that is tight, with basic measurable goals that are attainable.

The beef industry also needs to explain that environment on land designated for grazing and farming differs from land set aside for conservation purposes such as national parks. That management of land used for beef production needs to sustain quality soils, water and a balance of the different vegetation types.

Social goals are more attainable if referred to the regional community as against the broader community. It becomes very difficult to meet an expectation or be responsible for every community on earth.

Bodies such as the Productivity Commission continually acknowledge the huge cost of environmental regulation to portions of the rural community and this sacrifice is ongoing. The Productivity Commission also sees that if the community does not have to pay for community environmental goals it will continue to ask for further environmental services.

Again the term "continuous improvement" should be replaced with "seek to improve and/or maintain."

Please note further slight changes to the sustainability definition as suggested below to better reflect what the beef industry does, and is entitled to use, with care, natural resources for the provision of a benefit to our community.

Suggested Sustainability definition - **Sustainability is the production of beef in a manner that is economically, socially and environmentally responsible in the use of natural resources, seeking to improve and/or maintain whilst providing for local communities, people, and the health and welfare of animals.**

An important structural change to how the framework is presented

As written above in 'Background', from the Beef Squaretable came one central important theme - Australia has its own very good, positive, beef sustainability story to tell the world.

PRA appreciates that the current web site is for the purpose of feedback from participants in the beef supply chain and the general public of the draft Australian Beef Sustainability Framework. The steering committee could well have something different in mind for the final presentation. However for the purposes of trying to explain what PRA believes to be very important in how the framework is finally presented, we need to start from the current web site.

Currently as presented in the draft, communicating our story has become secondary in the draft framework. It is there but only as a web page link. From the Australian Beef Sustainability Home page[1] - if you click on any of the 4 framework areas – Animal welfare, Economic resilience, Environmental Stewardship, People & community – on the new web page there will be these words - "*Click here to see what the industry is currently doing on …….. "*

Our story, in the draft is to be found by knowing what link to click on, this then takes you elsewhere.

It needs to be the top, central feature of every page. All the four different framework areas must have information of the high level of legislation, regulation, and certification and vendor declaration that the Australian beef industry has to comply with. Each framework area has a table or spreadsheet that displays priority areas, indicators, definition and measurement. This table would

[1] http://www.sustainableaustralianbeef.com.au/

take up half of an A4 page. The top half of the page should communicate our story, in a few paragraphs and web links including a link to a purpose written fact sheet.

These two elements should be welded together; the table should not be available without communicating "our story."

The four framework areas

A great deal of care needs to be taken in the wording for the priority areas, definitions and measurement. It is a fine balancing act to present a framework that is credible to the general public while being realistic and attainable for the beef supply chain. It will be inevitable that this framework of our own making will be used to measure the beef industries sustainability.

The Australian beef industry is under continued attack from radical activists campaigning for animal free agriculture or an extreme environmental ideology. We should not try to pander to this minority and simply accept their demands cannot be satisfied. It is too easy to be influenced or reactive to the radical element.

How the framework areas are worded should avoid being framed apologetically, we are at fault manner. The framework needs to be proactive not defensive. This can be done without falling into the trap of a superficial, slick, sales pitch. The framework areas need to be credible, proactive and positive.

Animal Welfare

Economic Resilience

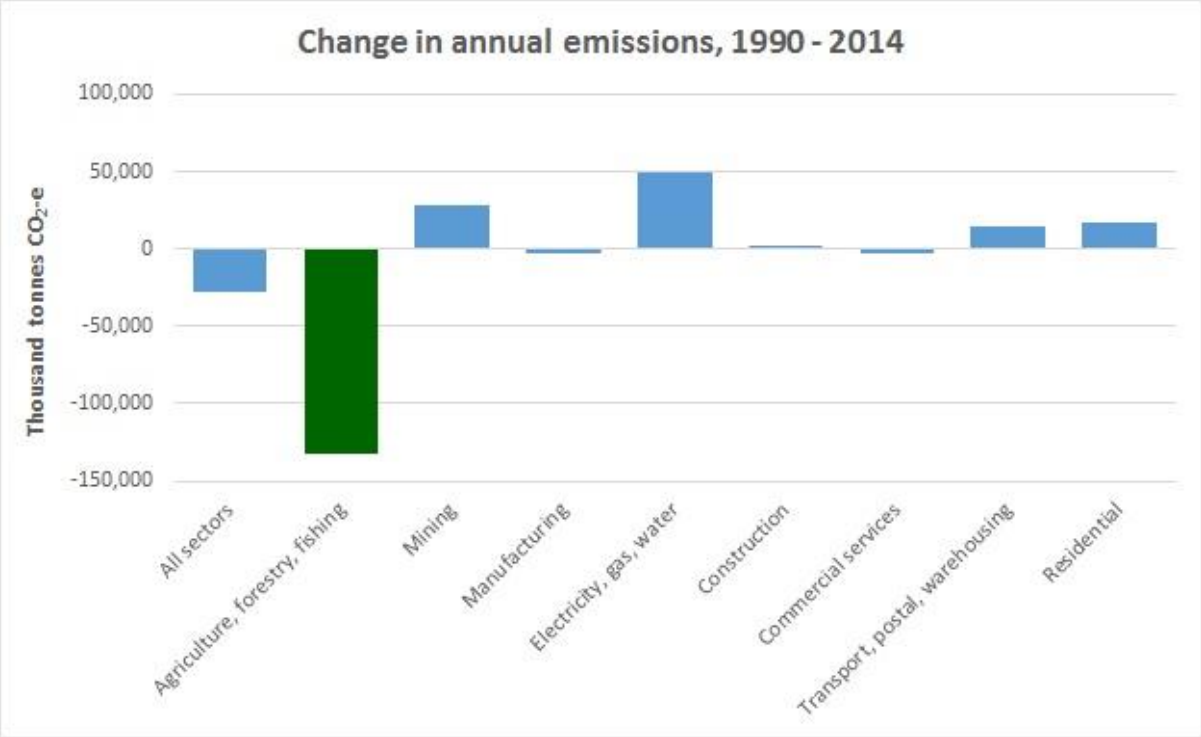
Environmental Stewardship

Climate

Current Indicator – Emissions intensity of raising beef cattle

PRA urges the committee to continue to work on this indicator to reflect the role of sequestration. In telling tour story at the beef production level there are many research papers showing that livestock production sequesters more carbon than what it emits.

Agriculture as a whole has done nearly all the heavy lifting in regards to emissions reduction. Starting with Kyoto where agriculture met this target plus more as other industries continued to at that time increase emissions. In later years at a Senate Estimates hearing the Environment Department revealed that Australia per capita reduced emissions by 28% of which over 20% was contributed from farming, forestry and fishing. Recently The Australia Farm Institute revealed figures that emission reduction is overwhelmingly being met from the farming, forestry and fishing sector. See figure immediately below.



Besides Australia as a whole is a net carbon sink.[2] This is demonstrated in very recent years by advances in technology with more accurate systems of measuring greenhouse gas emissions by both the NASA's OCO 2[3] satellite and Japan's GOSAT satellite.

Another reason to continue to work on this climate indicator is that does not reflect how important an element carbon is. It is through the sequestration of carbon and the important carbon/ water cycle that is crucial for improving agricultural production. Carbon is very much tied into soil.

Water

Current Indicator – Blue water used in raising beef cattle

There is a lot more thought need to go in this area. The question needs to be asked that, in Australia, is the use of water by livestock a problem? Anti animal agriculture activists try to portray it as a problem using inaccurate and unscientific arguments much which can be traced back to the discredited '2006 Livestock's long shadow report'.

The expansion of water infrastructure across the Australia rangelands and also aided much of the native fauna with especially kangaroo numbers dramatically increasing.

[2] http://www.propertyrightsaustralia.org/documents/1453457894_vegetation_management_in_queensland_-_some_essential_facts_21_jan_2016_update3.pdf

[3] https://disc.gsfc.nasa.gov/OCO-2

The amount cattle drink per day can't be limited as this would be an animal welfare concern. Water used for intensive usage such as irrigation and for feedlots is regulated and the amount of water to be used is limited by allocation.

Land Management

Current Indicator – Soil Health

PRA has little problem with this indicator. Healthy soils are our most important natural resource. As already written above under climate the sequestration of carbon is important for healthy soils.

Current Indicator – On farm ground cover

After soil health long term average ground cover is an important indicator of beef production sustainability. For the prevention of erosion, ground cover is more important than tree cover. There is a range of vegetation types including trees and grasses, but for the majority of bio-regions grass best prevents erosion.

However the amount of grass can vary because of season conditions with the major factor, the amount of rainfall. Grazing pressure needs to be adjusted to suit but it is inevitable that at different times of the year and in different years the amount of grass cover will vary.

A good indicator of how the health and sustainability of a grazing production system is how quickly grass growth responds after a period of low rainfall.

Currently the framework has no measure for this indicator. Suggested measure – Vegetative, rooted ground cover maintained at a minimal 30% in the majority of normal seasons. The capacity for the ground vegetation to be fully restored after drought.

Current indicator – Deforestation

PRA must strongly stress that the name given to this indicator must be changed.

Beef production occurs in Australia whose natural ecology was very diverse. The predominant grazing areas are savanna by definition. That is irregular tree cover and continuous ground cover of grass which is the ecologically dominant community. Grazing also in conducted on naturally treeless plains; even small areas as diverse as marine plains, and yes areas that were forested.

It is absurd to measure sustainability of a landscape based on one flora vegetation type – trees or canopy vegetation. Vegetation is also made up of ground cover, shrub layer, sub-canopy and canopy.

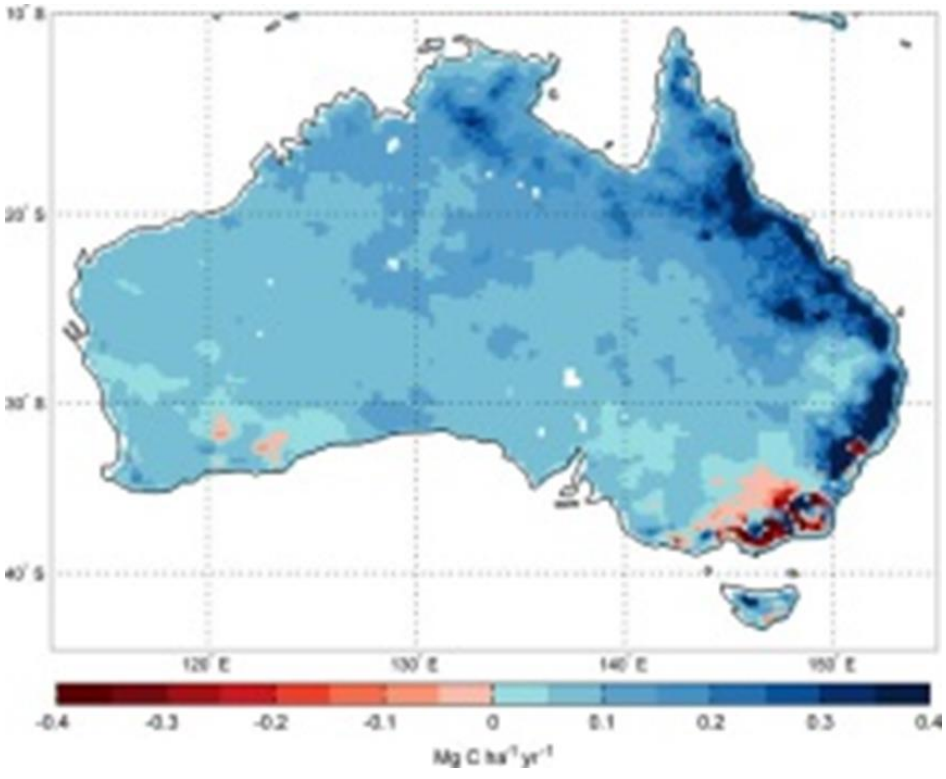
Thickening of tree cover and encroachment into grassland has been established by field work by rangeland and woodland ecology scientists over recent decades.

In the research report, 'Recent reversal in loss of global terrestrial biomasses, published on March 30 2015, vegetation in Australia has actually increased with the encroachment of trees into grassland a key factor. The research was collaboration between University NSW, Australian National University and CSRIO. It was an international study of two decades of work that developed a satellite technique called passive microwave remote sensing. Several satellites were used and the data was merged into one.

The report states:

> "We also found unexpectedly large vegetation increases in savannas and shrublands of Australia, Africa, and South America. Previous analyses have focused on closed forests and did not measure this increase.
> On average, Australia is "greener" today than it was two decades ago. This is despite ongoing land clearing, urbanisation and the recent droughts in some parts of the country"

The report included a map (below) that strongly illustrates that the majority of areas in Australia had an increase in tree cover despite the alarmism about tree clearing. On this map red is a decrease in tree cover while blue is an increase.



It must be recognised that beef production is conducted on land designated for agricultural production. The same level of protection does not apply as against national parks or conservation areas. In order to maintain for grazing, open forest and savannah the land needs managing and this requires reasonable thinning and clearing laws. All Australian states do have strong vegetation management laws, there is vigilant motoring for any illegal land clearing and large plenties are applied.

Suggested name change of this indicator - Balance tree/ grass cover

Suggested Definition. The percentage of canopy space occupied by trees. In the grazed woodlands of southern Australia and the northern savanna a continuous ground cover of grass should be able to thrive under this canopy which when in a scattered configuration occurs at 30% or less depending on climate. Strip retention is viable for biodiversity and grazing (QDPI and UQ research) and these should maintain 10% of original bio-region type, including savannah, in the property area (UN definition). A worldwide trend of savanna tree thickening is documented and presents a threat to these environments.

Current Indicator – Capacity of land to support biodiversity

People and the Community

Conclusion

This submission is incomplete but PRA hopes that it has covered some key areas and is constructive for the steering committee to improve on the draft framework.

PRA has a great deal further information in most of the areas covered in this submission and have amongst our networks scientists and well qualified professionals that PRA for supporting data.

PRA is available for further consultation.

Regards,
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