

2 November 2012

Ms Emma Breen
Project Officer
Public Health Section
Research Translation Group
NHMRC
Via email: dietaryguidelines@nhmrc.gov.au

Dear Ms Breen

Draft Appendix to the Australian Dietary Guidelines: Dietary Guidelines through an Environmental Lens

The National Farmers' Federation (NFF) welcomes the opportunity to provide comment on the proposed appendix which seeks to incorporate commentary on the environmental impacts arising from the consumption of food through the food choices of consumers.

As previous conveyed to NHMRC and the Minister, the NFF are opposed to the inclusion of any matters relating to the environment within the Australian Dietary Guidelines. The NFF has reasonably noted and offered to work with NHMRC on information materials about food choices for those professionals advising consumers on the consumption of food and food choices. The NFF believes that the inclusion of this appendix is not consistent with the offer and discussions with NHMRC.

Specifically in relation to the draft appendix, the NFF makes the following observations.

1. The science on environmental sustainability of agricultural production continues to evolve in Australia.

The NFF concurs that there is interest in the sustainable production of food in Australian and globally. The appendix quotes the NHMRC's own 2003 dietary guidelines as a reference to this comment – which does not assist in an independent assessment of the sustainability of Australian agricultural production.

Furthermore, the 2003 edition of the dietary guidelines quoted two documents both from JD Gussow dated 1986 and 1999 whose key message was that there are three destructive threats to food security: industrial agriculture, free trade and processed food habits of consumers. Gussow specialises in nutrition and food¹ and

¹ <http://www.tc.columbia.edu/academics/index.htm?facid=jeg30&page=biographical+information>

is not qualified to make judgements on the sustainability of agriculture more generally, and specifically for Australia.

The NFF endorses determining sustainable agricultural production using a triple bottom line lens, i.e. social, economic and environmental. This is also the view of Australian Governments. A 1998 report to SCARM² investigated “how well Australian agriculture is meeting the principles of ecologically sustainable development (the balance of meeting economic, ecological and social needs)”. In this report, the definition of sustainable agriculture was adopted from an earlier 1991 report³:

“the use of farming practices and systems which maintain or enhance: the economic viability of agricultural production; the natural resource base; and other ecosystems which are influenced by agricultural production.”

This approach is also the basis for the CSIRO Sustainable Agriculture Flagship program.

Agricultural practices continue to evolve – as noted by the 2011 State of the Environment Report⁴:

Land use trends for agriculture include the increasing sophistication of agricultural land management, significant reductions in the use of chemicals, more careful use of fertilisers in sensitive environments, and more flexible approaches to grazing land management.

The widespread adoption of minimum and zero till is a major achievement by Australian farmers than reduces the pressures affecting the land environment.

Dryland cropping – by international standards, dryland cropping in most regions is very efficient, although environmental performance is often difficult to assess.

Irrigation and intensive agriculture – irrigated agriculture has improved its environmental performance and the economic return per unit of water has increased.

A 2008 OECD review⁵ of the environmental performance of Australian agriculture noted:

- There were a range of programs (e.g. Caring for our Country, Biodiversity Fund) to address agri-environmental concerns such as soil, erosion and acidity.

² CSIRO 1998, Sustainable Agriculture: assessing Australia’s recent performance, a report to SCARM of the National Collaborative Project on Indicators for Sustainable Agriculture

³ Standing Committee on Agriculture 1991, Sustainable Agriculture, SCA Technical Report No 36, CSIRO Publishing, Melbourne

⁴ State of the Environment 2011 Committee, Australia state of the environment 2011, independent report to the Australian Government Minister for Sustainability, Environment, Water, Population and Communities, Canberra, DSEWPoC, 2011

⁵ OECD 2008, Environmental Performance of Agriculture in OECD Countries since 1990, Australia

- The relationship between agriculture and the environment is recognised in the broader framework of policies (e.g. National Water Initiative and National Strategy for ESD) aimed at improving environmental outcomes.
- Policies and programs around greenhouse gas emissions are building capacity and land management to reduce emissions. It should be noted that there has been significant government investment since the OECD report.

Specifically in terms of the NHMRC Dietary Guidelines and particularly the appendix undergoing public consultation, the following should be noted with regard to greenhouse gas emissions:

- The National Accounts pick up the UNFCCC default values (largely based on Europe) where there is no Australian accredited methodology.
- As Australia's environment and agricultural production systems are considerably different from Europe, the national inventory accounts may be overstating or understating the actual greenhouse gas emissions for some agricultural commodities. Red meat is a particular focus for the dietary guidelines appendix.
- For example, there are separate values for tropical and temperate cattle in the national inventory. However, recent science shows that the values for Australia may be the same and may reduce the emissions from cattle by some 30%. This initial work will need further science as well as an international accreditation before the national accounts can be adjusted.
- In summary, the science is evolving and misrepresenting one industry now in the dietary guidelines may prove to be harmful without the underpinning science in the future.

Moreover, research on lifecycle assessment shows that picking “winners and losers” by selecting one indicator for environmental sustainability may result in perverse outcomes – there is a risk of burden shifting where only single impacts are considered⁶. A good example of this are investments to increase water efficiency (piping and pumping) will lead to increased energy consumption and in turn increase greenhouse gas emissions.

It is notable that Australian agricultural production is widely acknowledged as being the most efficient in the world. Yet this is not recognised in Australia. Attendees at the recent Crawford Fund 2012 Parliamentary Conference had a number of presentations in relation to global sustainability. A number of speakers put up maps of major global issues – in not one of these maps did Australia focus as being an area of concern, including water and greenhouse gas emissions.

For sustainable agriculture, the Crawford Fund attendees were told the following was important:

⁶ Presentation by Stephen Wiedemann, FSA Consulting to Primary Food Environmental Sustainability Workshop.

- Stop deforestation – tighter controls on land clearing has effectively done this already for Australia;
- Intensify agriculture on existing land but noting the limitations of nutrients, water and yield ceilings (Australia’s farmers have always managed these);
- Deliver more with less chemicals and water. Australia is one of the lowest users of chemicals and water in the world already;
- Refocus on diets rather than biofuels (an issue for the US, EU, Northern China and Africa); and
- Reduce waste⁷.

Professor Julian Cribb has raised the last point previously⁸. In developing countries, this waste is post farm gate and in developed countries, consumers throw out between one third and half of food. Cribb notes that 2600 out of 4600 calories of food harvested is wasted – sufficient to feed 3 billion people⁹. Cribb also advises that doubling of investment in knowledge is required, a diet focussed on balanced nutrient intake and pay more for food so that farmers can improve production practices while removing trade barriers.

Cribb’s second point ought to be the focus of the dietary guidelines.

2. The reference list requires quality control

The reference list in the first instance replicates a number of references, e.g. 1048, 1049, 1050, 1052, 1053 and 1085 appear to be identical to 1079, 1080, 1081, 1083, 1084 and 1086.

Moreover, only 1042-1044 are quoted in the body of the appendix. Moreover, of these three references, none have expertise in agriculture or agricultural sustainability – these experts are experts in public health (and related fields), epidemiology and physics. Therefore, none of these is an appropriate scientific evidence based assessment of environmental sustainability of agriculture by suitable qualified agricultural scientists.

Of the remaining references and in particular G5 key references, this appears to be a collation of material in relation to agriculture – few if any deal with sustainability. For example, benchmarking water use in the vegetable industry (reference 1047) is about a baseline of water use and makes no comment on the sustainability of this use. Moreover, the results are questionable:

⁷ Presentation by John Foley, Institute on the Environment, University of Minnesota

⁸ Coming Famine

⁹ <http://www.sciencealert.com.au/features/20101804-20862.html>

“The comparative results were of interest, but their accuracy and value were rightly questioned given the limited sample and obvious differences in cropping circumstances.”¹⁰

Sixteen references related to water use (i.e. not sustainability) – 1046, 1047-53, 1055, 1056, 1057, 1060, 1065, 1074, 1075 and 1082. Seven relate to greenhouse gas emissions, including the Garnaut review more generally. The remaining thirteen relate to life cycle assessments, mostly in the dairy industry.

The ABS reference (1046) again is a data collection in relation to water use on Australia farms, is therefore a report about actual water use and makes no comment on sustainability. Moreover, it has been superseded¹¹.

The NFF suggests that “G5 Key References” is deleted from the appendix along with the raft of references that do not relate specifically to the sustainability of agricultural production or supply chain sustainability.

3. Guidelines through an environmental lens

The NFF commends the focus on food choices in the dietary guidelines. However, the proposed appendix takes this one-step too far by the inclusion of the table in G3. As discussed the previous sections, there is no evidence presented in the proposed appendix that discusses the sustainability of Australia’s agricultural production.

The “evidence” presented is a collation of material around resource use and efficiency of particular aspects of resource use. None attempts to assess all aspects of sustainability – on and off farm. Neither does the appendix recognise the myriad of policies and programs in place to enhance the sustainability of the natural resource base, be this water, biodiversity or greenhouse gas emissions.

This refutes the claim *“enough evidence exists to begin developing informed, pragmatic and guiding principles to reduce the environmental impact of the food system”*.

There is no evidence that supports that amending diets to align with perceived environmental sustainability, will result in improved environmental outcomes. Moreover, the NFF contends that the NHMRC Dietary Guidelines are not the most appropriate means to manage environmental sustainability and in particular the role of agriculture in supporting and underpinning this.

The NFF can only reiterate previous representations to the Australian Government and the NHMRC in that NFF is willing to work with NHMRC to develop appropriate education materials to assist health professionals to educate consumers about the appropriate food choices.

Furthermore, the NHMRC and health professionals have an important role to play in educating consumers to reduce food waste and their own footprint – rather than seeking to address this through the entire Australian community’s dietary guidelines.

¹⁰http://www.vgavic.org.au/research_and_development/Researchers_PDFs/vg04015_benchmarking_water_use.htm

¹¹ ABS Water Use on Australian Farms 2010-11.

To this end, G4 Practical Tips supports this comment but could be refocussed on reducing over consumption and food waste.

In summary, the NFF recommends that:

- The G3 table is removed;
- G5 is deleted as the references used do not discuss environmental sustainability but rely on the collation of material around resource use.
- The reference list only includes independent and appropriately qualified authors of references directly related to environmental sustainability and excludes all unrelated material.
- The remainder is re-written, with the assistance of agricultural sustainability experts (scientists, government and industry) to reflect the comments in this submission.

The NFF would be happy to discuss this submission in more detail. Please contact Deb Kerr at the NFF Office on 02 62695666 or dkerr@nff.org.au.

Yours sincerely/faithfully

A handwritten signature in black ink, appearing to read 'Matt Linnegar', written in a cursive style.

MATT LINNEGAR
Chief Executive Officer