



To whom it may concern

Capital Food and Fibre Strategy – Discussion Paper

The Commissioner for Sustainability and the Environment is an independent statutory position established by the *Commissioner for Sustainability and the Environment Act 1993*. My Office embraces transformative change for an environmentally sustainable future and encourages sound environmental practices and procedures to be adopted by the Territory and territory authorities as a basis for ecologically sustainable development.

I commend the Capital Food and Fibre Strategy discussion paper for explicitly embedding ecological sustainability in farming practices at its core. This submission focuses on the paper's questions around ecological health of agricultural land, climate change resilience and issues of locality and supply chains.

Towards goal one

Incorporating First Nations land management and traditional farming expertise

The Strategy should encourage investigation of the potential to develop commercial-scale cultivation or wild harvesting of traditional native foods and fibres that occur naturally in the region, led by Traditional Custodians. This would likely include support for development of local and regional markets for such products. Local Aboriginal people should be given ownership of any such projects and should be the first to benefit financially from them.

How do you think we can best support a thriving urban agriculture sector that is founded on ecological sustainability and community wellbeing?

Canberra's existing urban agriculture sector is made up of committed, skilful and knowledgeable people. Many of them belong to the large number of different organisations which operate community gardens at sites across the ACT. As well as traditional allotment-style gardens these include men's sheds, schools, and purpose-built community food garden collectives. The ACT Government already supports such groups through the provision of land under various leasing arrangements, and grant funding – notably the Community Gardens Grants program (www.environment.act.gov.au/cc/be-part-of-the-solution/Community-Gardens-Grants) which provides around \$40,000 per year to community garden projects, including for food gardens. Further support for and encouragement of such groups through the Strategy would be beneficial to the urban farming sector. In addition to this, the Strategy should investigate opportunities to strengthen existing and establish new local supply chains for the produce from this sector.

The availability of land within Canberra's footprint for an expansion of urban farming should be considered in the Strategy. This is particularly pertinent given current development pressures in and plans for the city. The Office supports urban infill development where it reduces the likelihood of greenfield development. The interplay of urban farming and infill development, both of which have potential sustainability benefits for the ACT but which may compete for land, should be examined.

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What practices do we need to change, or reconsider?

I encourage a re-examination of the viability of harvesting meat from kangaroos and feral deer and pigs killed during culling exercises as a carbon-neutral, local source of protein. This could be either for human consumption or food use in pet or animal feed. My Office's 2021 investigation¹ of scope three greenhouse gas emissions² identified meat from cattle and sheep as the most carbon-intensive food types consumed in the ACT. The use – or future use – of feral or native meat should be reconsidered, especially in light of potential future increases in the price of traditionally-farmed meat should reduction of carbon emissions be financially incentivised in the Australian market.

Recommendation – that the Strategy investigates the potential of traditional native foods and fibres that occur naturally in the region, led by Traditional Custodians. To include market development.

Recommendation – that the Strategy encourages local groups to support community-led urban farming projects through targeted financial and practical support. To include market development.

Recommendation – that the Strategy re-examines the viability of harvesting meat from culling

Towards goal two

Goal two provides details about the need for building resilience to future drought in the ACT's agriculture sector and related industries. However, the goal and proposed vision speak to broader issues of climate change which are not discussed further in any detail.

The impacts of climate change on the ACT, beyond drought, are already being felt by primary producers. Future impacts from climate change above current warming levels will be extensive. These include projections for changes in:

- i) the timing, severity and duration of heavy rainfall;
- ii) timing and severity of frost days
- iii) timing and length of bushfire seasons and frequency of extreme fire danger days; and
- iv) the frequency, timing, severity and duration of extreme heat in various seasons.

Without consideration for the occurrence, and co-occurrence, of multiple extreme weather and climate events, development of resilience will be limited and potentially misplaced.

Recommendation – that the Strategy adopt a comprehensive multiple hazard approach to climate change resilience.

Towards goal three and goal four

In 2021, my Office investigated scope three greenhouse gas emissions in the ACT. Food is the second largest source of scope three emissions in the ACT. As food production has a significant impact on climate change, the development of a local food system must consider the carbon footprint of locally-produced food through clear actions, such as:

- Quantitatively estimating emissions associated with food consumed within the Territory, in order to provide stakeholders with a tool to set concrete emissions goals.

¹ Office of the Commissioner for Sustainability and the Environment, 2021. Scope 3 Greenhouse Gas Emissions in the ACT. <https://envcomm.act.gov.au/wp-content/uploads/2021/11/Scope-3-Greenhouse-Gas-Emissions-in-the-ACT-FINAL-Report-A30648089.pdf>

² Scope 3 emissions are those produced outside the city boundaries as a result of what is consumed within it.

- Using estimates of food greenhouse gas emissions to determine whether food can be produced more efficiently at a local level, rather than relying on imports. This could be targeted to examine emissions intensive stages of food production. It could also allow estimates of emissions from different points in the supply chain, and set targets to reduce them.
- Improving knowledge of other sustainability practices surrounding the supply chain of food imported to the ACT, and informing consumers about it in order to assist with their choices.
- Exploring methods to mitigate emissions produced by enteric fermentation (from cattle and sheep products).

Recommendation – *that the Strategy considers the estimation of the ACT’s greenhouse gas emissions associated with food items consumed within the ACT, both for those produced within the region and for those imported. If possible, consider estimating the emissions of food items at different stages of the supply chain to inform targeted emissions reduction at specific stages of the supply chain.*

Recommendation – *that the Strategy considers the development of a local food purchasing policy for ACT Government that will support the preferential selection of catering suppliers that use local products and work to minimise the length of their supply chains.*

Thanks for your consideration and please do not hesitate to contact me if you have any queries about this submission and recommendations.

Yours sincerely

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

Dr Sophie Lewis
Commissioner for Sustainability and the Environment

18 February 2022