



**Tim Whetstone MP**

Member for Chaffey



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## **Submission**

# **Select Committee on Sustainable Farming Practices**

**December 2012**

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## **Introduction**

As the Member of State Parliament representing one of South Australia's primary food bowls, I support the establishment of the Select Committee on Sustainable Farming Practices and its terms of reference.

This submission will not comprehensively address all topics covered *Issues Paper (September 2012)*.

Detailed comment will focus on:

- the financial viability of farm businesses;
- agricultural research, development, extension and adoption; and
- labelling and regional/state branding.

## **About the electorate of Chaffey**

The South Australian state electorate of Chaffey (area 16,400km<sup>2</sup>) has a population of approximately 40,000 people and includes about 3000 food producers.

The majority of food producers in the electorate, which includes the Riverland and northern Mallee regions, are irrigated horticultural producers. These comprise the majority of irrigation water entitlement holders in South Australia. In addition there are a number of 'dryland' broadacre grain and livestock producers.

The electorate's economy is very much reliant on food production. Estimated gross agricultural value for the region in 2010-11 was \$598.8 million (*Australian Bureau of Statistics*). This figure is down on earlier years as a direct result of drought, and large areas of irrigated land (approximately 6000 hectares) being taken out of production due to water entitlements being purchased by the Federal Government.

In addition to being South Australia's largest wine grape production region (accounting for approximately half of South Australia's wine production), the Riverland provides a climate highly suitable for a range of irrigated agricultural industries including citrus, stonefruit, almonds, olives and vegetables. The majority of these involve permanent plantings and perennial horticulture. Major crops include wine grapes (\$183.9 million in 2010-11), citrus (\$90.5 million in 2010-11), nuts (\$46.3 million in 2010-11), stonefruit (\$25.4 million in 2010-11) and potatoes (\$24.3 million in 2010-11).

Irrigated food production in Chaffey is the most efficient in the Murray-Darling Basin, the result of millions of dollars of private and public investment over the past 40 years. Irrigation water is delivered by pressurised underground pipes. Water use is accurately metered at the point of extraction from the river system and at the farm gate. On-farm irrigation mostly comprises efficient drip or pivot systems. Irrigated food production and the River Murray are integral to the region's social fabric and its history. The electorate of Chaffey itself is named for the Chaffey brothers, who founded Australia's first dedicated large irrigation settlement at Renmark in 1887.

Dryland agriculture in the region – largely concentrated in the northern Mallee – is generally characterised by low-rainfall, low-input, low-yield broadacre grain production, with some livestock enterprises. Grain production in the region has enjoyed a resurgence following the drought with wheat production valued at \$136.7 million in 2010-11 and barley production at \$9.5 million (ABS). Livestock production has also increased recently, valued at \$40.3 million in 2010-11.

Food processing in the region in 2005-06 was valued at just over \$1 billion (wholesale value), with wine accounting for about 63% of this figure.

Food production, processing and packing is a major source of employment in the electorate, with approximately 29% of people directly employed in food production and associated businesses. About 47% of businesses in the electorate are directly involved in the agriculture or food industries.

#### *Note on redistribution of electoral boundaries*

From March 2104 the Chaffey electorate will expand to wholly include the District Council of Karoonda East Murray and the Southern Mallee District Council. These areas are primary centres for grains, sheep, potato and onion production, utilising rainfall and groundwater sources such as the Mallee Prescribed Wells Area.

#### **Financial viability of farm businesses and communities**

The committee's *Issues Paper (September 2012)* broadly notes the challenges that must be overcome to ensure global and South Australian food security. I consider these are concisely outlined by the following:

*“Food security has once more risen to the top of national and international policy agendas. Despite steady progress in many countries in the agricultural development necessary to underpin the food security of a growing global population, there remain formidable challenges to food production and to current and future food security. These challenges include:*

- *Significantly increasing demand for food due to population growth and, in Asia particularly, income growth. Global population is still growing by around 130 people per minute, with the highest rates of increase being in Africa, and in parts of Asia. When combined with rapidly increasing incomes and urbanisation, this has resulted not only in intensified demand for food, but also changing patterns of demand. There have been, as a result, unpredicted increases in the demand for meat, dairy products, oil crops, sugar crops, fish and fruit. Livestock feed requirements have also risen in line with the ‘livestock revolution’ in Asia, and elsewhere.*
- *Reduced supply of food resulting from a range of issues. Foremost among these is reduced land capacity for food production, arising from urbanisation, from competing land uses including the production of biofuels, and from land and soil degradation. Combined with this, reduced availability of water for irrigation and other farm uses, arising from increased competition for water for urban, industrial and environmental purposes, as well as declines in both water quality and water infrastructure, have also adversely impacted on productivity in many food-producing regions. Finite or dwindling water supplies and still rapidly increasing global population means less water per capita for future food production, and in many parts of the world this will be exacerbated by climate change, particularly in the tropics and sub-tropics. A warming, drying climate especially in currently semi-arid regions will place further pressures on food production*

*there. In addition, all farmers have been impacted to a greater or lesser extent by the increasing costs of fuel, energy and other farm inputs, including fertiliser, that are dependent on a 'finite' oil supply and its generally rising costs.*

*"A combination of the above factors, together with a long-term substantial reduction of investment in agriculture, including in agricultural research, development, technology transfer and extension, has resulted in reduced rates of productivity growth for all the major food crops, at a time when significant productivity increases are necessary but essential, for future food security, particularly in many LDCs.*

*"As a result of these imbalances, - more people and more food needed, but a generally slowing and eroding global capacity to produce more food – feeding the world in the foreseeable future can only be assured by a revolution in sustainable agriculture, and associated management of land and ecosystems. The 'home grown, sustainable green revolution' must now be implemented with urgency."*

*Professor Tim Reeves FTSE (2009) A sustainable green revolution for global food security.*

Professor Reeves notes the impact on farmers of the increasing costs of production. In South Australia, this has been further exacerbated by the high Australian dollar (up from less than US\$0.70 in 2009 to over US\$1.00 in 2012) resulting in diminishing returns on exports, fluctuating commodity prices, drought and reduced water allocations in irrigation areas. Many food producers, particularly in Chaffey, struggle with high debt levels.

As noted in the *Issues Paper* (p7), the financial viability of farm businesses is necessary to underpin food security however the viability of many of these businesses is threatened in the short term by the factors outlined above. Members of the Committee would appreciate that many factors impacting on farm businesses' financial viability are beyond farmers' control. Risk is an inherent factor in agriculture. Effective risk management, particularly in a business sense, can offset farmers' vulnerability and I suggest the Committee consider ways and means of how the farming sector and rural communities can be assisted to better manage their risk. Key areas include:

- **Diversification of farm enterprise and business base** – while many Australian farms have more than one enterprise (for example, cropping and livestock), many do not and are therefore highly exposed to risks associated with climate, exchange rates and commodity market fluctuations. Diversification of a farming business improves its resiliency and minimises its exposure to commodity-specific risk. The Committee could profitably explore ways to by which farmers could be assisted with diversification of farm enterprise, and with business management training in areas such as succession planning.
- **Diversification of regional economies** – regional communities can be heavily reliant on a limited economic base. Chaffey is an excellent example in this respect, with a heavy reliance on irrigated horticulture leaving it vulnerable to low river system flows and low water allocation regimes in response to drought. Diversification into areas such as tourism and aged retirement living, along with value-adding and a more varied farm commodity base, has been identified as the primary means of making the local economy less reliant on irrigated horticulture (Riverland Regional Prospectus, Riverland Futures Taskforce). The Committee might consider how rural communities could be assisted in diversifying their

economic base by fostering the development of new farming and food manufacture industries.

- **Off-farm income** – many farming families require, at different times or all the time, a form of off-farm income (often this is a case of a family member employed in a non-farming position or running a separate business) to meet the cost of living. Some farmers invest capital in off-farm income such as shares or real estate. However, as was demonstrated during the recent drought when many farmers still required exceptional circumstances (EC) support, lack of off-farm income exposes farmers to risk. The Committee should consider ways to by which farmers could be assisted or encouraged to improve their overall long-term sustainability through off-farm investments.
- **Regional infrastructure and services** – greater public investment in basic regional infrastructure and services such as transport, health and education is not only necessary for the economic growth and sustainability of regional communities, but will also substantially benefit food production in terms of efficient export paths and supply chains, and a regionally-based workforce with requisite skills and expertise (both in terms of attracting and retaining people).

Regional communities have inherent strengths which make them socially resilient in the face of economic difficulties, but the recent drought has demonstrated many social problems which can arise from such difficulties. Investment in, and support for, these communities will enable their inherent social strengths to come to the fore and provide long-term support for a sustainable South Australian farming sector and food security.

### **Agricultural research, development, extension and adoption**

Long-term challenges (and opportunities) to South Australia's farming sector and food security will not be met without also having the support of a strong and innovative research, development, extension and adoption regime both nationally and in South Australia:

*"In the coming decades, Australia's rural sector will face considerable challenges, including climate change and the need to concurrently increase productivity and sustainability to respond to rising global demand for food while maintaining the resource base for future generations.*

*"Meeting these challenges will require long-term transformation of the rural sector, defined broadly to include communities associated with agriculture, fisheries and forestry as well as related industries along the value chain. Every effort should be made to secure and enhance the substantial capability that enables our rural sector to develop, access and apply world-class, adaptive knowledge."*

p3, 'National Strategic Rural Research and Development Investment Plan'  
Rural Research and Development Council (2011).

The RRDC's recommendation to the Australian Government in response to these challenges and opportunities is worth noting:

*“The Council recommends increased investment, including by the Australian Government, in rural RD&E to: enable Australia to play its part in the global effort to double rural sector output over the next 30 years while utilising proportionally fewer resources; develop a range of technologies and knowledge to contribute to healthy Australian lifestyles and global food security; and produce a wider product range, including food, fibre, energy and bio-based products, as well as ecosystem services.”*

p4, ‘National Strategic Rural Research and Development Investment Plan’  
*Rural Research and Development Council (2011)*

Food security in South Australia will also be underpinned by the agricultural sector and food industries’ long-term ability to compete in international and domestic markets. South Australia’s ‘edge’ in this context is safe, high quality food and fibre production enabled by historic and modern innovation, relative freedom from many agricultural pests and diseases and, in general, best practice farming and food manufacture.

These advantages have been underpinned by significant public and private investment in agricultural research, development and extension, and a robust quarantine regime. These advantages will also drive the competitiveness of South Australian agriculture in the future.

I acknowledge and welcome discussion at the national level on food policy and the development of a National Food Plan (*Issues Paper*, p7). The National Food Plan green paper includes a proposal to increase the Australian Government’s contribution to rural research and development, which in 2008-09 totalled \$1.118 billion (*National Strategic Rural Research and Development Investment Plan*, p19).

South Australia has historically played a prominent role in rural research and development and continues to make a valuable contribution, however it is worth noting that South Australian Government funding in this sector has declined and continues to do so.

The most marked decline has been in extension services and this raises a serious concern about falling adoption rates. To an extent this gap has been filled by the private sector, but private sector extension necessarily has a commercial imperative and this can have a further detrimental impact on adoption rates. This has been recognised by one publicly-funded Australian research body in response to farmer concerns: the Grains Research and Development Corporation (GRDC) has for several years now run the National Variety Trials (NVT) program to provide farmers with objective and independent assessment of new grain crop varieties bred and developed, for the most part, by private interests. An important feature of the NVT program is its geographic breadth: hundreds of trial sites located across all of Australia’s cropping zones in order to assess new varieties in Australia’s highly varied soils and climate conditions.

I consider that adoption rates will be improved and better targeted by greater investment, by both Federal and State governments, in extension, particularly at a regional level. Specifically this means greater provision of publicly-funded, regionally-based agronomists specialising in both commodity and cross-commodity agronomy, utilising locally-based research.

This model had phenomenal success in terms of adoption rates over many years in the Riverland region, with the Loxton Research Centre undertaking regionally-specific horticultural research on

new varieties, pest and disease management, salinity management and especially water-efficient irrigation technologies, and a team of locally-based agronomists providing valuable extension services.

The need for extension also applies to market intelligence. Difficulties experienced by the South Australian citrus industry over the past two years highlight the need for farmers to have better market intelligence provided by sources independent of private interests. Local growers have been slow to adapt to changing market preferences, maintaining large orange plantings (navels and valencias) for which they are now receiving prices below the cost of production while other citrus fruits such as mandarins and lemons command higher returns.

While I do not anticipate the South Australian Government will have much capacity to substantially increase its rural research and development funding, I consider there is significant capacity to employ extension officers and agronomists to leverage national-level research spending and extend it locally to improve research outcome adoption rates for South Australian farming and food businesses.

With regard to research and development itself, I generally agree with the following rural research and development priorities: productivity and adding value; supply chain and markets; natural resource management; climate variability and climate change; and biosecurity (Australian Government (July 2012) *Rural Research and Development Policy Statement* p20).

Additionally however, I consider that research, development, extension and adoption should also be targeted to address the rising cost of inputs for farming:

- Intensive agriculture in Australia relies on some inputs which at this time come from largely finite sources: fuel and fertiliser. Over the long term, the availability of these inputs will be reduced and the cost will increase. Research must be focused on reducing agriculture's reliance on these inputs. Examples of systems which reduce these inputs are controlled traffic farming (CTF) utilising accurate GPS guidance, which has shown promise in its capacity to reduce fuel use on broadacre farms and also improve productivity through reduced soil compaction, and variable rate technology (VRT) – again using GPS guidance in addition to yield mapping and other information – which has shown promise in reducing or optimising fertiliser use. Soils research providing a better understanding of soil macro and micro biology, and how to utilise its benefits for productivity, will further reduce reliance on fertiliser.
- Another key input is chemicals: research needs to focus on reducing our reliance on chemicals not only from a cost-of-inputs standpoint but also to address pest resistance, human and animal health, and environmental issues as well as enhancing our advantage in domestic and international markets ('green' food). Integrated pest management (IPM) shows potential in this area, and again, soils research and how to utilise soil biology to improve plant health and suppress diseases must be pursued.

- Of particular issue in the electorate of Chaffey is the rising cost of electricity. While this is not strictly an agricultural research issue, the rising cost of this input especially affects water-efficient irrigators who require large amounts of electricity to pump and pressurise irrigation water. Irrigators in Chaffey are the most water-efficient in the Murray-Darling Basin, but this efficiency has come at a price. I consider there is scope for some changes to electricity price structuring to alleviate the impact of its cost on irrigated food producers, and potentially for research into technology that may reduce electricity use.

### **Labelling and branding**

Australian consumers' expectations of best practice in Australian agriculture reflects the common knowledge and confidence that, in general, Australian farmers produce food of a high quality standard. However, domestic consumers are severely hampered in making informed choices about purchasing Australian-produced food by confusing and inconsistent labelling:

*"...nearly half of all Australian consumers (40.3%) find it difficult to identify whether a product is Australian made or grown. In addition, understanding of country of origin labelling is low, with better understanding of the term 'Product of Australia' (61.0%) than the term 'Australian Made' (35.3%). This indicates a need for clearer government regulation and standardisation for country of origin labelling, and greater education on country of origin terms. Main reasons for buying Australian made and grown products included: wanting to support Australian growers and manufacturers (15.2%), better quality products (13.3%), taste (if food) (11.9%), higher safety/better health (if food) (11.5%) and better value (9.9%)."*

2012 Consumer Survey (July 2012)

Roy Morgan Research, on behalf of the Australian Made Campaign

<http://www.australianmade.com.au/new-research-reveals-what-consumers-want-when-it-comes-to-australian-made/>

The survey cited above also found that 68% of consumers purchase products grown in Australia based on country-of-origin claims, and 58% of consumers purchase products made in Australia based on country-of-origin claims.

Australian consumers clearly want to buy Australian food, and must be provided with unequivocal and consistent labelling which allows them to make this choice with confidence. While it is national food policy that must address country-of-origin labelling laws and regulations as a priority to reflect Australian consumers' requirements, and to assist Australian farmers and food manufacturers in taking advantage of Australian consumers' preference for Australian-grown and Australian-made food, South Australian governments (State and local) and businesses have an important role to play in regional branding and other mechanisms that will improve the competitiveness of South Australian food in domestic and international markets.

South Australia has distinct regions with signature food, wine and beverage products, some with strong reputations and presence in various marketplaces. What the State has lacked is a comprehensive regional branding strategy that takes advantage these inherent strengths. The Committee could well consider a recommendation to explore and implement a State and regional branding strategy that builds upon the strong foundations and advantages enjoyed by South Australia's food producing regions.



## Comments on the Issues Paper (September 2012)

### *Land-use planning*

The Chaffey electorate has a number of issues directly related to this topic, specifically:

- horticultural and dryland agricultural properties in close proximity and the potential for conflict over spray drift;
- numerous farming operations in close proximity to the River Murray and other important environmental assets, including on-farm natural heritage areas;
- council zoning that in the main acts to protect horticultural land for its purpose;
- more than 6000 hectares of property subject to a moratorium on water use as a result of the owners receiving drought exit packages; and
- a mineral sands mining operation in the Mallee (Murray Zircon), and several landholders being impacted by mineral sands exploration.

Spray drift (specifically, spraying by broadacre farmers impacting on more sensitive horticultural properties) has become a problem in the Chaffey electorate. I am aware of some conflicts which have arisen in the region as a result, and this issue clearly needs to be addressed by regulation.

I consider that existing regulations and laws for protecting environmental assets and heritage areas from negative farming sector impacts are for the most part adequate, however in some cases they have represented a risk to sustainable farming. This was highlighted by the 2010-11 locust plague in South Australia, where initially many farmers were prevented from accessing and spraying heritage areas.

Some landholders in Chaffey who received exit packages, and were subsequently subject to a five-year moratorium on water use on their properties, have sought to sub-divide and sell parts of their property for rural living purposes. They have been prevented from doing so by council zoning laws which seek to preserve horticulture-zoned land. For the most part I support this approach, however it should be noted it has effectively stalled the region's economic recovery from the drought and prevented substantial re-investment in horticultural production.

Mining activity in the Mallee has not had a substantial impact on farming however landholders who have been impacted by mineral sands mining at Mindarie have raised issues about rehabilitation of farmland after mining operations have ceased. There are also concerns about whether or not compensation offered for the impact of exploration activity is adequate.

### *Food security and natural resource management*

I consider that I have addressed some food security issues in previous sections of this submission, save for management of natural resources. Here I consider it is pertinent to discuss the impact of Murray-Darling Basin water reform, particularly the Federal Government's \$3.1 billion water buyback program.

The impact on the Chaffey electorate (where five in every six South Australian River Murray irrigators operate) has been substantial, with more than 100 gigalitres of water removed from South Australia's 2009 baseline diversion limit and more than 6000 hectares of irrigated land being taken out of production. The flow-on effects have not been kind to the community: businesses have closed, jobs have been lost, real estate values have declined, people have left the region and there is a significant strain on social services. Irrigators who have remained on the land are forced to pay an increased share of fixed water delivery costs. Water-use moratoria on exited irrigated land prevents investment and development, and severely hampers regional economic recovery and growth. Purchase of water entitlements has targeted not "willing sellers", but desperate sellers.

Pioneering infrastructure and on-farm efficiency upgrades in the region over the past 40 years – which have made irrigation in Chaffey and South Australia the most water-efficient in the Murray-Darling Basin – have also effectively prevented local irrigators and irrigation industries from accessing substantial funds from the \$5.8 billion Sustainable Rural Water Use and Infrastructure program.

The Federal Government's implementation of the Water for the Future initiative has unequivocally reduced food production in the Basin and negatively impacted regional communities, because the majority of water recovered for environmental flows to date has been taken directly from food production with water entitlement purchases, and there has been unforgivable delay in the flow of funding for infrastructure upgrades.

A key example of the delay is the Menindee Lakes project in New South Wales:

*"An example of recovery work which should be undertaken prior to the development and imposition of SDLs is the Menindee Lakes. As noted by the Authority (pp 12-14 River management – challenges and opportunities 25 November 2011), "...the draft Basin Plan assumes that current operating arrangements for the Menindee Lakes will remain in place". It is our argument that projects to recover water, like that identified by the CSIRO for the Menindee Lakes (Podger 2011 Darling Water Savings: Options for Environmental filling 17 November 2011), should be a priority before the imposition of SDLs. This project could recover up to 174 GL for environmental flows without compromising food producers or regional communities in the Basin."*

*p5, Submission to the Murray Darling Basin Authority (April 2012)  
Tim Whetstone MP, Member for Chaffey*

In 2007 the Federal Government committed \$400 million to the Menindee Lakes project but as yet nothing has been done, and meanwhile water continues to evaporate from the lake system at an average rate of 426 GL per year.

The most promising recent development in infrastructure upgrades was the Federal Government's commitment in the 2012-13 Budget of \$200 million over four years to assess infrastructure upgrade projects in the Basin and their capacity to return water to environmental flows. However this commitment will not directly recover water either. My submission to the MDBA proposed that this sort of assessment – essentially an audit of all potential water savings that do not compromise food production and regional communities – be undertaken prior to setting sustainable diversion limits

(SDLs) and factored into SDLs. In short, it should have been done much earlier and projects identified in the audit should now be underway.

While infrastructure upgrades are more expensive than water entitlement purchases in terms of cost per unit of water recovered, there are important long-term advantages of upgrades over buyback that must be factored. Upgrades will inject money and jobs into regional and rural communities, provide better water security for irrigated food and fibre producers and, if properly targeted on water delivery and storage infrastructure, will not further compromise the Basin's food production, Australia's food security, and regional communities' economic and social sustainability.

From a 2009 baseline diversion limit of 665 GL, from 2019 South Australia will only be able to extract 481 GL of water from the River Murray. From 2024 this figure may drop further, to less than 450 GL. As required by the *Natural Resources Management Act 2004*, water allocation planning for the River Murray prescribed water course (and prescribed groundwater sources) will be critical to ensure water security and access for irrigated food producers.

Another key issue in this respect is carryover water. Currently, SA irrigators' carryover (stored in Menindee, Hume and Dartmouth) is the first to 'spill' in the event of water being released from these storages. SA irrigated food producers' water security would be substantially enhanced if their carryover water was instead treated the same as carryover water for New South Wales and Victorian irrigators – essentially 'sitting under' water controlled by the Commonwealth Environmental Water Holder in these storages. This would require substantial negotiation with the Commonwealth and other Basin states, but would go further to effectively recognising SA's responsible water use.

An additional consideration with regard to food security is South Australia's quarantine status and biosecurity regime. The State is fortunate to be free of a range of pests and diseases which affect crops and livestock.

Fruit fly is of particular concern to the Chaffey electorate. South Australia remains the only mainland state free of this pest, however it should be noted by the Committee that South Australia now faces a significantly increased risk of Queensland fruit fly outbreaks, threatening industries that contribute some \$2.9 billion to the State's economy. This is the result of the New South Wales and Victorian governments largely abandoning efforts to eradicate numerous outbreaks in their sections of the tri-state Fruit Fly Exclusion Zone. Queensland fruit fly is now effectively endemic in major fruit growing regions in these states.

While I acknowledge the South Australian Government's commitment to maintaining the State's fruit fly free status, it should be noted the Government has, relatively recently, attempted to reduce funding to the State's fruit fly program – specifically, reducing hours at the 24-hour quarantine stations at Yamba and Ceduna.

Any reduction of funding to this program must be resisted, especially in view of the increased risk of an outbreak in SA. I acknowledge the Government has undertaken to update contingency plans for a fruit fly outbreak in the Riverland, however I believe that a comprehensive review of the overall State program is warranted, with a view to strengthening the State's protections against fruit fly.

### *Technology and science*

The phrase 'clean and green' is all too easily misused and I welcome the Committee's commitment to seek a comprehensive definition. It is my belief that 'clean and green' does not mean organic farming, chemical-free food production, or non-GM food. Instead it acknowledges best practice farming and food production that focuses on minimising environmental impacts, includes high-level quality control, freedom from a range of pests and diseases, and animal welfare.

With regard to genetically modified (GM) crops – specifically canola – I consider the Committee should above all assess the economic impact on the food industries in Australian states where GM canola has been grown commercially for the past four years.

### *Variability of weather and climate*

I consider that highly focused research, development and extension as mentioned previously is a priority in addressing long-term climate variability with a view to enhancing the South Australian farming sector's capacity to adapt, and to better manage the risks associated with short-term weather variability.

However, the Committee should note and quantify the negative impact on farming and food businesses, along with associated industries such as transport, of Commonwealth legislation enacted this year to place a tax on greenhouse gas emissions.

### *Business models for farming and ancillary industries*

As mentioned in previous sections of this submission, better risk management at the individual farm level will be critical to a sustainable farming sector. As the Issues Paper notes (p14), farmers require a range of support services, some of which are rightly provided by the private sector (financial planning and marketing).

With respect to compliance, I have mentioned in a previous section the need for publicly-funded, regionally-based agronomists and I consider this could be extended to compliance officers provided their interaction with farmers takes a cooperative, rather than punitive, approach.

## **Contact details**

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