



National Food Plan Unit
Department of Agriculture, Fisheries and Forestry
By email to nfpsubs@daff.gov.au

National Food Plan Issues Paper

A response from Vegan Society NSW and Vegan Australia, September 2011

The Vegan Society NSW and Vegan Australia are pleased to have the opportunity to provide a submission for the development of the National Food Plan (NFP).

The Vegan Society NSW is a community-based, non-profit organisation in New South Wales, Australia. Our aim is to promote the many benefits of veganism and provide quality service, support and up-to-date information to vegans and the general community.

Vegan Australia is a new national vegan organisation that aims to promote veganism to the broader Australian public. Vegan Australia envisions a world where all animals live free from human use and ownership. Compassion is the foundation of Vegan Australia – compassion towards animals, people and the earth. Vegan Australia believes that the starting point for people to put this compassion into action is to become vegan and to encourage others to become vegan.

The Vegan Society NSW and Vegan Australia see benefit in taking a national approach to food policy and planning. The NFP is an excellent opportunity for the Australian Government to correct some significant distortions in the food production system that have contributed to climate change, high levels of waste and other environmental and social costs.

Importantly the NFP is an opportunity to reflect on our use of animals for food, and consider alternative diets and food systems that could promote compassion and put an end to the unnecessary suffering and killing of animals for food consumption.

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What is the most important thing you think a national food plan should try to achieve?

The Vegan Society NSW and Vegan Australia strongly recommend that the NFP include consideration of the wellbeing and rights of animals. The NFP should include strategies and policies to put an end to the unnecessary, yet widespread, suffering and killing of animals, and facilitate a rapid transition to sustainable and compassionate, vegan, plant-based diets. Importantly the NFP should acknowledge and support the great number of Australians who for animal rights, environmental, health, religious and other reasons, have already adopted plant-based diets.

The Vegan Society NSW and Vegan Australia recommend that the NFP be developed with a sustainable food system as its goal. Sustainable food should be produced, processed and traded in ways that contribute to thriving local economies and sustainable livelihoods; protect the diversity of both plants and animals; avoid damaging natural resources and contributing to climate change; and provide social benefits such as good quality, affordable fruit and vegetables, safe and healthy products and education.

2. What do you think the vision and objectives for a national food plan should be?

An important objective for the NFP is to develop innovative measures, incentives and regulatory reforms that will achieve dietary change toward more sustainable and compassionate, vegan, plant-based diets. As part of this objective the NFP should include targets for reductions in meat and dairy consumption in Australia.

To enable the uptake of more sustainable, vegan, plant-based diets, the NFP should also have the following key objectives:

- All Australians to have access to affordable and adequate fresh fruits and vegetables and other plant foods irrespective of income by 2015.
- To improve the health of Australians and lower the burden on the health system by reducing the incidence of dietary related diseases.
- To use Australia's land resources more effectively and sustainably.
- To end the use of animal agriculture systems within the next 20 years by building up and supporting our fruit, vegetable and grain producers.

The vision for the NFP should be:

• To create a sustainable, equitable and just food growing and distribution system that benefits all Australians

3. What do you see as the major risks to Australia's food supply in the coming years and decades? How could they be avoided or managed more effectively?

Climate change is the most significant risk to Australia's food supply in the coming years and decades. The risks are well documented and include significant impacts from higher temperatures, changed precipitation and increased intensity of extreme weather events. Australia's food supply is extremely vulnerable and at risk due to the changes in rainfall that are likely to occur due to climate change.

Additionally, animals are suffering and being killed for food consumption for both domestic and international markets, despite the fact that the production of livestock is particularly greenhouse gas intensive. Emissions from cattle are the largest contributor, accounting for 73 per cent of livestock emissions, and sheep account for a further 18 per cent². Emissions from livestock are projected to increase.

Also, diet related disease is a major risk for Australians and the Australian health system, and currently accounts for some two thirds of Australia's health budget. This stems from the fact that more than a million Australians cannot afford nutritious fresh fruits and vegetables. Many Australians overconsume animal products to the detriment of their own health.

These risks as well as the loss of city fringe farmland to urban development, and the peaking of oil and phosphorus are major concerns. To address these risks, the Australian Government must ensure a more integrated planning approach to food policy where gaps between state government planning and land management decisions and national-level climate change adaptation, water and food security planning and decisions are integrated and synchronised. Such an integrated approach would then seek to ensure the following:

- Protection for the long term wellbeing of Australia's land, people and animals.
- That all aspects of Australian food production, manufacturing and distribution are consistent with the principles of ecologically sustainable development including the precautionary principle, the principle of intergenerational equity and the polluter-pays principle.
- Protection of prime agricultural land and the agricultural water supply.
- Fair economic returns to fruit and vegetable farmers.
- Support and incentivisation for the development of community-based and regional food systems that support regional economies and improve food access.

¹ Eg. NCCARF, Food Systems, Climate Change Adaptation and Human Health in Australia

² Tracking to Kyoto and 2020 – Australia's Greenhouse Emissions Trends 1990 to 2008-2012 and 2020. Department of Climate Change, August 2009

- Recognition and support for the many Australians who have transitioned to sustainable plantbased diets.
- Access to affordable and adequate fresh fruits and vegetables irrespective of income.
- Investigation and implementation of innovative measures such as tax reforms and subsidies to promote access to healthy plant-based foods to reduce diet related greenhouse gas emissions and the burden of chronic disease (see page 7 & 8).
- All Australians have access to information to enable informed food choices.
- Promote and facilitate the transition to sustainable and compassionate, vegan, plant-based diets.
- The wellbeing and rights of animals are acknowledged and the use of non-human animals for food consumption is brought to an end.
- Address the knowledge gap in numbers and trends in uptake of plant-based diets, including vegan diets ie. Census data.
- Address the knowledge gap in the volume and trends in food waste.

Addressing the climate change impacts of livestock production

The Vegan Society NSW and Vegan Australia would like to stress the importance of addressing climate change, but wish to make clear that caution needs to be taken when considering strategies for reducing emissions from livestock.

We are aware that a number of techniques are under consideration as solutions to reducing emissions associated with livestock production (enteric fermentation) – these include diet manipulation, animal breeding and genetics, rumen manipulation, and changes in livestock management. There is a concern that these techniques are likely to have potentially harmful consequences for farm animals. The techniques for abatement of enteric methane emissions such as increased use of concentrates in the diet, use of antimicrobials and measures that increase "productivity" and "efficiency" of livestock production are likely to cause a great deal of suffering for farm animals. It is also a concern that many of these techniques lend themselves to intensive feedlot systems. There is a risk that livestock switching may occur away from beef and sheep to monogastric animal production—adding to the already burgeoning numbers of pigs and poultry, raised mainly in industrial systems with the associated suffering and misery that results; or, a shift to kangaroo or fish consumption may occur, with negative consequences for these animal populations³⁴.

³ For example, see: Ben-Ami, D. (2009), A shot in the dark – a report on kangaroo harvesting, [for Animal Liberation NSW], May.

⁴ FAO (2006), The state of world fisheries and aquaculture, http://www.fao.org/docrep/009/A0699e/A0699E05.htm#5.1.1\

The Vegan Society NSW and Vegan Australia reject the notion that greenhouse gas emissions can be reduced by supply side abatement techniques which attempt to alter the natural digestive processes of animals. We find these techniques unacceptable when a simpler and more effective method of reducing greenhouse gas emissions is to phase out meat and dairy consumption. The adoption of vegan plant-based diets is the optimal greenhouse gas abatement method available to us and avoids the use of animals for food – therefore avoiding unnecessary animal suffering at the same time. The NFP should recognise this and make transitioning to sustainable and compassionate, vegan, plant-based diets a priority.

There is strong evidence that greenhouse gas emissions can be reduced through reductions in meat and dairy consumption⁵ and while rarely featuring in Australian climate or food policy discussions, internationally this strategy is receiving more attention. In 2009 the Swedish government put out guidelines for climate friendly food choices that recommended to Swedish citizens to reduce their meat consumption as a way of reducing greenhouse gas emissions. The guidelines specifically recommend eating less meat, explaining that such action will lower a person's carbon footprint⁶.

The UK Sustainable Development Commission recently prepared advice to the UK Government on areas for further research and action on sustainable diets. The Commission recommended reducing consumption of meat and dairy products as a priority area due to the likely significant and immediate impacts on making diets more sustainable (in terms of environmental, economic and social impacts) and have the positive impact of large reductions in greenhouse gas emissions⁷.

A NFP should include initiatives to investigate public information and behaviour change initiatives that could lead to this kind of change in the diets of Australians. The success of such programs could be monitored through census data on diets.

4. What does food security mean to you? How would this be achieved? How would we know if/when we are food secure?

In addition to the definitions provided in the Issues Paper it is important to point out that part of the solution to creating better food security in our communities is to recognise that our current system distorts and externalises the costs of food production. That is, food that is produced in large scale operations are typically more heavily fertilised, waste more water, require transportation over longer distances, and generally have lesser nutritional value for consumers (heavily processed foods), and

⁵ For example: Carlsson-Kanyama, A. and Gonzalez A.D. (2009) 'Potential contributions of food consumption patterns to Climate Change', American Journal of Nutrition; Stehfest, E. Bouman, L., van Vuuren, D., Elzen, M., Eikhout, B., Kabat, P., (2008) 'Climate benefits of changing diet', Climatic Change; Carlsson-Kanyama, A. (1998) 'Climate change and dietary choices – how can emission of greenhouse gases from food consumption be reduced', Food Policy Vol. 23, No ¾.

⁶ National Food Administration and Swedish Environmental Protection Agency (2009). Environmentally Effective Food Choices: proposal notified to the EU 15 May 2009. Slockholm: Livmedel Verket.

⁷ REdd, S., Land, T., Dibb, S., Setting the table: Advice to Government on priority elements of sustainable diets, Sustainable Development Commission, December 2009, p. 4.

greater environmental and social impacts. Unfortunately, these foods are usually the cheapest, but the worst for our health.

We will know that we are food secure when all Australians have easy access to affordable and fresh, locally produced, and preferably organic foods that use less fertilisers, less transport fuel, create less waste, have higher nutritional value and fewer environmental and social externalities and are better for our health. It is important to realise that we can achieve food security without the use of animals for food (see Q5).

5. What are the most important benefits that Australian consumers get or should get from our food supply? Why?

Australian consumers deserve nutritious, delicious, affordable and sustainably produced plant-based foods. Science supports a low-fat, plant-based diet for optimal health⁸. The American Dietetic Association (ADA) states that, "vegetarian diets, including total vegetarian or vegan diets, are healthful, nutritionally adequate, and may provide health benefits in the prevention and treatment of certain diseases. Well-planned vegetarian diets are appropriate for individuals during all stages of the lifecycle, including pregnancy, lactation, infancy, childhood, and adolescence, and for athletes." The ADA's position paper on vegetarian and vegan diets (2009) references more than 200 studies and papers to support this conclusion, and studies continue to show that plant-based diets can aid in reversing type 2 diabetes, cardiovascular disease and some types of cancer⁹.

Therefore, Australian consumers deserve to be educated about the benefits of plant-based diets, including vegan diets, and supported by government by way of better information about how to adopt plant-based diets and through regulatory reforms to make fruits and vegetables and other plant foods accessible and affordable to all Australians, including those living in regional and remote communities.

- 6. What two or three actions: by the government sector would most benefit food consumers? by the non-government sector would most benefit food consumers?
- Ban all advertising for animal foods and non whole-foods and promote healthy vegan diets.
- Move subsidies from animal production to fruit and vegetable production.
- Ensure that all Australians have access to affordable and adequate fresh fruits and vegetables irrespective of income.

⁸ Physicians Committee for Responsible Medicine: http://www.pcrm.org/health/diets/pplate/why-power-plate

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7. What do you see as the major opportunities for Australia's food industry in the coming years and decades? How could they be realised?

There is a major opportunity for producers of plant-based food products. The range of meat analogues and delicious vegan products is already extensive but there is room for expansion of this market as more Australians shift to plant-based diets. Government can assist by providing incentives to those in the business of sustainable fruit and vegetable production, manufacturers of vegan products and so on.

8. What two or three actions: by the government sector would most benefit businesses that make, distribute and sell food? by the non-government sectors would most benefit businesses that make, distribute and sell food?

On this point, the Government must make sure that this consultation process and through its engagement with big business – agribusiness, logistics, food processing, or retail business – should not distort the preparation of the NFP. A national food plan should seek to have objectives that are in the public interest, not the short term, private interests of those companies representing the various parts of the food supply chain.

Additional comments

Following are some suggested ways that government can influence meat and dairy consumption and promote sustainable diets¹⁰:

- Adapt dietary advice to reflect a sustainable balanced vegan diet e.g. PCRM's Power Plate¹¹
- Ensure basic food literacy and skills education is available in all schools in Australia
- Public health campaign to reduce consumption of livestock on disease risk grounds
- Inform and educate Australians about more seasonal consumption and lower impact forms of food storage
- Facilitate community action by providing funds to groups or movements promoting sustainable diets
- Education on plant based diets in schools delivered through the national curriculum
- Restrict advertising for highly greenhouse gas intensive foods
- Restrict advertising for meat and dairy products and industries
- Work with retailers and caterers to increase the number of meat and dairy free products, recipes and promotions
- Lead by example Government functions to have vegan catering and menus
- Introduce a labeling system on food products so they are easily identifiable as vegan
- Introduce a labeling system on menus in restaurants with vegan options easily identifiable

¹⁰ These suggestions are adapted from: WWF & Food Ethics Council (2009), Livestock consumption and climate change - A framework for dialogue. September 2009.

¹¹ http://www.pcrm.org/health/diets/pplate/power-plate

- Introduce a maximum standard for the greenhouse gas intensity of all foods measured in gCO2e/kg or cCO2e/kj
- Encourage or require major retailers to reduce the average greenhouse intensity of their product ranges
- Encourage or require retailers to remove the most greenhouse intensive products from sale
- Work with processors, caterers and retailers to reformulate food and meals to reduce their greenhouse gas intensity, including by eliminating meat and dairy content
- Change procurement rules and practices to favour lower impact diets and increase the availability and promotion of vegan meals
- Introduce GST style taxes on the sale of greenhouse intensive foods
- Introduce taxes on the sale or trade of greenhouse intensive agricultural inputs including fertilizer and animal feed¹²
- Provide tax advantages or direct support for low-impact production systems
- Eliminate any direct subsidies or price support that promotes high impact production systems
- Value forests to limit deforestation which contributes to the global footprint of livestock products.
- Fund behaviour change campaigns and programs to facilitate a rapid transition to sustainable and compassionate, vegan plant-based diets. Eg. Social marketing, 'VegPledge' type initiatives.

Thank you for considering this submission.

Yours sincerely,

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¹² Sweden and Norway have taxed nitrogen fertilizer to control pollution