



31 March 2023

Agricultural Traceability Branch
Department of Agriculture, Fisheries and Forestry
GPO Box 858
Canberra ACT 2601

Via email: NationalTraceabilitySummit@agriculture.gov.au

RE: Implementation Plan for the National Agricultural Traceability Strategy 2023-2028

The National Farmers' Federation (NFF) welcomes the opportunity to provide feedback on the draft Implementation Plan for the National Agricultural Traceability Strategy 2023-2028 (the Plan).

The NFF is the national peak body representing Australian farmers and agriculture. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and length of the sector.

Australia has an excellent reputation as a leading exporter for high-quality, safe, sustainable and nutritious produce. Access to competitive global markets is critical to ensuring the long-term viability and resilience of Australian agriculture and hence our domestic food security. Further, participation in global agricultural trade provides Australian farmers with the opportunity and security to continue to innovate, invest and strive toward productivity gains and profitability goals.

Robust traceability standards, systems and technologies are centric to ensuring consumers' continued confidence in Australian agricultural products. The National Agricultural Traceability Strategy (the Strategy) will bolster Australia's capacity to demonstrate the quality, safety and sustainability of our agricultural products at a time when consumers and international trading partners are demanding increased transparency over agricultural supply chains and assurance measures.

The success of the Strategy is contingent on its effective implementation and engagement across Australia's agricultural supply chains.

Firstly, the NFF identifies the need to highlight the Australian Agricultural Sustainability Framework (AASF) as a relevant initiative to Pressing challenge 1. Coordinated by the NFF with the support of the Australian Government, the AASF is a unique piece of work which enables a central source of information about Australian agricultural sustainability, providing a translation layer between farm practices, markets and the community. Given the intersection of traceability processes and capturing sustainability credentials, the AASF is relevant to the priority to *Align processes and technologies to capture and use data for multiple purposes*, in addition to others more broadly. Similarly, the NFF also supports the relevance of individual agricultural industries and commodities' sustainability frameworks and measurement mechanisms to this component of the Strategy. In following, as traceability and sustainability are increasing linked with trade and market access, farmers will be required to demonstrate measurable outcomes towards trade-related traceability criteria and systems. The Plan, particularly through the development of activities' substantive detail, should acknowledge that support is required to ensure farmers capacity and ability to integrate required measurements and reporting into their enterprises.

Further, the NFF supports and refers the Department to the comments of the NFF Horticulture Council, and makes the following additional high-level recommendations:

- The NFF supports the alignment of frameworks and data standards to maximise traceability system innovation, security and interoperability, including streamlined regulation. There are considerable benefits associated with ensuring data is more available, freely shareable and portable between service providers, as identified in the *Productivity Commission, Data Availability and Use, Inquiry Report*. With strong relevance in the context of traceability systems and services, the NFF highlights the need to:
 - 1) ensure farmers remain in control of their data; and
 - 2) are able to use relevant data as feedback to improve their business practices, including the timely sharing of valuable market intelligence back to producers.
- The NFF supports the use of traceability systems to reduce red tape and to streamline bureaucratic processes associated with trade. In addition to the strong focus on export trading requirements, the streamlining of domestic, interstate trading requirements must also be adequately considered through this activity.
- The NFF supports establishing strong governance mechanisms for the Australian agricultural traceability ecosystem, which include industry bodies such as NFF and key member organisations. Notably, further detail regarding the governance of the Strategy and its implementation is required for stakeholders to appropriately consider their roles and responsibilities in key activities and will be instrumental in determining funding and resourcing arrangements.
- The NFF supports further investment by the Australian Government in traceability systems and standards wherever there is a strong and demonstrable public benefit. In a competitive market, careful consideration must be given to any support to private technology or service providers. Any such support must be directed at businesses that have clearly demonstrated they have a mature product meeting an industry need.
- The NFF generally supports the proposal to ensure that traceability activities recognise and integrate with existing programs. The Plan should adequately consider relevant work of Australia's Rural Research and Development Corporations (RDCs) which could provide or contribute to traceability outcomes sought in the Strategy. Ensuring a thorough scan of existing industry initiatives will be important to deliver best value for money from the Strategy. This only further highlights the need to ensure consistent, timely and comprehensive stakeholder engagement and support remain at the forefront of the Strategy and Plan.

The NFF looks forward to continuing to work closely with the Department and Australian Government to shape and inform the detail of the Plan's proposed activities.

The NFF thanks the Department for the opportunity to provide feedback. The policy contact for this matter is Charlotte Wundersitz, Policy Officer (Trade & Economics) via e-mail: cwundersitz@nff.org.au or phone (02) 6269 5666.

Regards,



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