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Via email: submissions@hilltops.nsw.gov.au

Dear Sir/Madam

Submission on Hilltops Council Economic Growth and Landuse Strategy

Australian Pork Limited (APL) welcomes the opportunity to make a submission to the *Hilltops Council Economic Growth and Landuse Strategy* (the strategy). APL congratulates the Hilltops Council on taking a proactive role in considering the land use needs of the Hilltops Council's region in order to continue to develop Hilltops and its surrounds. APL also welcomed the opportunity to participate in the stakeholder engagement processes throughout development of this draft strategy. APL concurs that agriculture, particularly the pork industry, has untapped potential to make an even greater contribution to the economic, social and environmental outcomes of the region and supports the further development of both the Hilltops Council area and New South Wales more broadly.

APL is the peak national representative body for Australian pork producers. It is a producer-owned company combining marketing, export development, research and innovation and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry. In the recent [Economic Contribution Report – Pork Industry in Australia 2015-16](#) prepared by ACIL Allen, the Australian pork industry employs more than 36,000 people nationally and contributes \$5.2 billion in gross domestic product to the economy.

Economic contribution of the pork industry

In 2015-16, pork production in New South Wales contributed around \$321 million (value-added) to the state's economy and supported 1,960 full-time jobs, generating \$160.4 million in household incomes for New South Wales families. More locally, pork production has a long and dynamic history in the Hilltops region. Currently there are around forty piggeries registered on the PigPass database within the Hilltops region. Based upon APL's database there are currently around 4,730 sows and 43,000 growers in the region. These pork producers provide a positive impact on regional communities such as Hilltops Council, as demonstrated by the analysis that at a local level, a family farm with 250 sows injects around \$850,000 into the local economy each year.¹

Supporting and growing key industries

It is encouraging to see the strategy has identified agriculture, particularly intensive agriculture, to provide the greatest real growth and value-add contribution to the region, ahead of other short term or lower capability options such as mining. This approach will provide a significant competitive advantage for Hilltops Council. APL welcomes this position, as the pork industry has unexploited potential to bring economic growth to the community

¹ ACILAllen Consulting, 'Economic Contribution Report: Pork Industry in Australia - 2015-16, November 2017, http://australianpork.com.au/wp-content/uploads/2018/01/ACILAllen_PorkIndustryEconomicImpactReport_Final_17Nov2017_corrected.pdf

of the Hilltops region. This is because protein consumption continues to grow, and consumer preferences are changing. In 2015, pork overtook beef consumption to become the second most consumed meat per capita in Australia after poultry. Reasons for this include change in price making pork comparatively cheaper, continuity of supply considering that intensive production processes make it easier to manage supply levels, and change in consumer taste.

To maintain this competitive advantage, regional strategies, planning systems and policies such as this strategy must be developed to enable rather than hamper the growth potential of both agriculture and the more specifically, the pork industry. As such, APL would contend that LSPS/LEP Recommendation 1 needs to follow the language and intent of the strategy, which clearly identifies the importance of the intensive agriculture industries and the value-add opportunities they provide. However, the language of the recommendation table unfortunately misses this critical point and changes the language to “*value-adding in the agricultural industry*”. It is our position that this recommendation must clearly identify “intensive agriculture” rather than “*agriculture*”.

Protecting important agricultural land

APL is pleased to see the strategy has identified the zoning of areas of land designated for agriculture with a planning and use approach that allows a diverse and flexible market approach moving forward. This is of particular importance for pig production, where site selection is critical to the success of the operation.

When choosing a site suitable for intensive pork production, a multitude of factors must be considered including:

1. Environmental – such as soil type, catchment protection, nutrient management, and local land heritage
2. Economic – including efficient access to feed, water, labour, road access, processing facilities and markets
3. Biosecurity – ensuring adequate separation distances between pork production sites to reduce the risk of disease spread between sites, and
4. Community – including separation distances to manage potential amenity (odour, dust, noise) impacts on surrounding communities and industries.

Primary industries are experiencing continual pressure for change and increasing demands and community expectations are being placed on valuable land and water resources that are essential for agriculture. It is therefore important that adequate provisions are made at both local and state levels to enable growth and development of the pork industry into the future.

Such provisions may include:

1. Setting aside specific areas for intensive livestock production in Local Environmental Plans (LEPs)
2. Mapping and zoning of important agricultural land and land appropriate for intensive production to protect it from other uses, and
3. Controlling subdivision on the fringes of important agricultural land to prevent urban encroachment.

APL is aware of the holistic approach being taken by both Hilltops Council and the NSW Department of Primary Industries in this regard to ensure that state and local government planning instruments enable growth in intensive livestock production. Such an example includes the development and alignment of *The Important Agricultural Land*

Mapping project being undertaken by New South Wales Department of Primary Industries² to the Hilltops Council land use strategy.

APL supports the development of the *Potential Protein Precinct & Agricultural Intensification Area* (the area) under LSPS/LEP Recommendation 3. However, APL considers the proposed area to be very limited. APL would propose that the area be extended to include everything west of the Lachlan Valley Way. This approach would be more appropriate because of the following reasons:

1. Throughout the strategy, it is clear that agriculture, particularly intensive agriculture, provides the most benefit to the Hilltops region. APL suggests that a larger area would demonstrate to existing intensive producers and future potential investors that Hilltops is serious about intensive agriculture and encourages and embraces its development and expansion throughout the region.
2. APL is concerned that where a producer identifies a site highly suited to intensive agriculture outside of the proposed area, this may unintentionally suggest to a potential investor or assessor that this site is restricted and thus makes development of the site difficult or even impossible. APL suggests reframing or clarifying the intent to ensure that existing or potential investors are not restricted or deterred from developing industries outside of the identified priority area.
3. The proposed area in the strategy poses concern to APL for animal welfare reasons, with particular regard to biosecurity buffers for both new and existing piggeries. As you may be aware, endemic diseases pose constant management challenges to Australian pig producers, whilst exotic disease if introduced, would decimate Australia's naïve pig population. Diseases can be spread by wind, birds, flies, rodents, other wild and domesticated animals, vehicles, trucks, people and other items brought onto the piggery.

Millions of dollars are lost each year as a result of disease and producers invest millions of dollars each year into keeping disease out in order to keep their pigs safe. The first and best line of defence is good biosecurity. Biosecurity limits the spread of disease from one pig farm to another and to units within the one pig farm.

Whilst a biosecurity buffer zone of at least 3 km will assist manage the introduction of air-borne pig diseases, producers establishing a new commercial, peri-urban, or a one pig enterprise should also consider other factors such as the location, regional pig density, topography and screening such as hills. The development of an on-farm biosecurity plan is integral to ensuring the health of the pig herd once the piggery development is approved.

APL recommends that on-farm biosecurity plans are implemented once a piggery is approved and licenced by Council (and where required, the state department of environment or equivalent) to operate, noting these approvals will have conditions that will need to be implemented.

4. APL is also concerned that creating an area targeting specific industries or producers that this may be unintentionally misinterpreted and limit expansion of existing farms in the future.

² <https://www.dpi.nsw.gov.au/agriculture/lup/agriculture-industry-mapping/important>

Support innovation

Planning policy must facilitate rather than stifle innovation and investment to enable future growth and development of industries within the Hilltops region. As such, APL commends the supportive approach for producers through the development application process. Such support should be extended to both existing producers seeking to improve or expand their production systems and to future potential investors.

APL also supports that innovation and incentives should be considered as part of the strategy to embrace production systems that can achieve a circular economy approach. Innovative pork production systems already exist in New South Wales which reflect the principles of a circular economy. APL contends there is untapped potential in the pork industry to support this approach and there is already evidence of industry early adopters taking on such a critical role in innovation, and resource management and use.

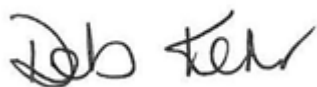
An example within the Hilltops region producers already maximise waste avoidance by utilising manufacturer's waste as pig feed in a liquid feeding system, maximises the value of resources through an on-farm biogas system that generates energy and heat to power pig production facilities from pig effluent, and conserves and re-uses resources through generation of fertiliser products for use on other farm production systems.

In Summary

APL welcomes the approach being taken by the Hilltops Council through the development of the *Hilltops Council Landuse Strategy*. APL supports Council's proactive role in considering the region's land use needs in order to continue to develop Hilltops and its surrounds. APL concurs that agriculture, particularly the pork industry, has untapped potential to make an even greater contribution to the economic, social and environmental outcomes of the region and supports the further development of both the Hilltops Council area and New South Wales more broadly.

APL would appreciate the opportunity to be involved in further consultation and would be happy to discuss any of the comments provided in this submission. If you require further information or have any questions, please contact Grantley Butterfield, Policy Manager – Planning & Environment on 02 6270 8820 or grantley.butterfield@australianpork.com.au.

Yours sincerely



Deb Kerr
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