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AGRICULTURAL COMPETITIVENESS GREEN PAPER

COMMENTS

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SUMMARY OF ISSUES

In general, Australian agriculture needs to move from small independent farms with a commodity focus to larger farms with a product focus.

Farms working together as cooperatives, networks or similar or working in a joint corporate structure may be a way for current owners of small farms to stay involved.

Farmers need to be assisted and encouraged to develop a business focus as well as a production focus, with using outside advice as a matter of course. Again, working together in cooperatives or similar may be a way to get this more commercial approach.

Accordingly, farm support mechanisms, including R&D, need to move to a company focus not an industry focus.

These changes are happening anyway, driven by tighter bank lending criteria and rising demands of supply chains. Failing to assist and facilitate these changes will lead to much suffering, more suicides and more foreign ownership.

GENERAL COMMENTS

The Green Paper is really quite disappointing in that it has not done what Agriculture Minister Joyce said in that he was looking for 'the big ideas, to shake things up'. The Green Paper is a mish-mash of old ideas and incremental change from the current situation.

A dramatic, quantum, change is needed, from a policy and institutional framework based on production, industries and commodities to one based on marketing, companies and products.

Looking at the achievements of Australian agriculture, it has to be said that current policy has utterly failed in that;

- Food exports are falling while food imports are rising.
- We have focussed on commodities and not products for far too long.
- Foreign investors are making significant investment in farming in Australia while Australian investment in our own agriculture is low.

- Australian investment in farming overseas is low.
- A significant percentage of our food processing facilities are foreign owned.
- Australia has few significant agribusiness companies with an international presence.
- We have a limited export of services in agriculture.
- A significant proportion of the new bigger agriculture projects are from outside the 'agricultural establishment', ie those driven by Anthony Pratt, Gina Reinhardt and Andrew Forest.
- Singapore, with a population of some 5.4M and no agricultural production of significance, is a far greater player in world agribusiness than Australia.
- Suicide is seen as the only way out by far too many debt ridden farmers.

It is suggested that the key issues for Australian agriculture are;

- Improve the business skills of our farmers. The same can be said about almost any other industry sector in Australia.
- Develop new business models. There is increasingly little scope for small, independent, commodity producing farmers. New ways of working together in cooperatives or marketing companies or some other ways to commercially bring together groups of smaller farmers are essential.
- Facilitate more market-led R&D by companies or cooperatives, rather than the committee-led industry level R&D done now.
- A much greater focus on ethical food production, which includes animal welfare but should also address indigenous issues, given that our farm land was once indigenous land, and the management of wildlife.
- A much greater focus on environmental sustainability, which is an economic competitiveness issue as well as an environmental protection issue. Environmental protection based on sound science and economics is a benefit not a cost. This will increasingly be demanded by our customers.

A range of other issues flow from the above, including workforce development, off-shore investment and the export of agricultural services.

Considerable input to the Green Paper has been obtained from our farming community, which is right and logical. However, this has led to too many suggestions which are basically looking for subsidies of one kind or another. This is most unlikely to happen under the current or any likely future government.

However, it would appear that there has been less than adequate input from a wider range of expert sources. Alan Mitchel, the economics editor of the Australian Financial Review speaks about the Green Paper being 'bad farm policy', in an article on 27 October 2014.

Other general points include:

- Issues also seem to have been considered in isolation, rather than from a holistic perspective. If more of our farmers had better business skills then a whole range of other issues would likely be addressed.
- There is still the focus on commodities and industries.
- A focus on top-down, committee driven projects.
- Too much government direction, for example on R&D priorities.
- Too much focus on industries and
- Too little of a commercial focus.

CHAPTER COMMENTS

Overview

The Government's one key objective is 'to achieve a better return at the farm gate'. It is then said that if this is achieved, then investment will follow and increased income will flow to farming regions. The information in Appendix C: Characteristics of top performing farms surely sums up the whole approach needed. That is,

better business skills and business models. If some farms achieve better farm gate returns, without even a higher per unit price, then surely it is the business skills issues.

The point is made on p ix that most value in agriculture is now post farm gate. It would be interesting to see if similar figures are the case for say mining. The other issue is that Australian farmers have progressively sold interests in post farm gate value adding. Farmers in Denmark and the Netherlands presumably have significant additional income from ownership of post farm gate activity such as in Danish Crown, Rabobank and Flora Holland. It would be interesting to see the income profile of shareholders in the Murray Goulburn Cooperative from that due directly from milk sales and that from dividends from the processing of that milk.

The statement also on p ix that we have had ‘tremendous success we have had so far in agriculture’. As noted in the General Comments above, it is suggested that our current policy approach to agriculture has comprehensively failed. We need to stop the self-congratulatory praise and face facts. We need a quantum change in agricultural policy.

The banks, supply chains and foreign investors are driving change in agriculture anyway and we should change our policy framework now to maximise the economic benefits and minimise the pain.

Background

The comment on p5 that we have an abundance of land may not be quite correct. We have much land certainly but many of our soils are of low quality and much of our farm land is semi-arid, useful only for extensive grazing.

The list of competitive advantages on p5 are really our areas of comparative advantage. Only a company can turn a comparative advantage into a competitive advantage. This is a subtle but meaningful difference.

It is true, as noted at the bottom of p5 that, on average, our farm profitability is low. Following paragraphs note the significant variability in farm profitability. Surely, the challenge is to assist the low end of Australian agriculture to improve profitability, probably via new business models, or exit farming, with dignity. This is what Alan Mitchell of the Australian Financial Review suggested, as cited above.

Infrastructure

A number of groups made submissions on the range of infrastructure needed. Certainly, Australia, along with many other countries, has neglected infrastructure spending over recent decades. However, it cannot be stated firmly enough that infrastructure needs a sound business case before it is funded. There will never be enough funding in the short to medium term to meet all the infrastructure gaps that have been identified.

The scale of infrastructure required may need farmers to contribute to the funding needed. This highlights the need to rapidly move from lower margin commodities to higher value products, so that farmers have the income to contribute to this needed infrastructure.

Communications infrastructure is a gap that needs to be filled even though it is hard to do a normal business case as many applications of ITC are yet to be identified. However, the range of ITC applications identified to date show that this is almost the number one infrastructure need. For example, the scope for land use management via satellite imaging is only starting to be explored but has particular promise.

Comments from people in regional Australia are that current broadband is inadequate with current ITC applications. This suggests that major upgrades are needed.

The list of projects under ‘What the Government is already doing’ is impressive, and requires significant funding. However, most of this infrastructure is not in farming areas. Much of this will be relevant as it will improve freight generally, especially port access. However, getting farm products to ports is also important.

Funding of \$33M has been provided for the Outback Way, from Winton in Qld, to Alice Springs in the Northern Territory to Laverton in WA, near Kalgoorlie. This is certainly a ‘nice to have’ road but it is through really remote areas and is, it is suspected, mainly a tourist road. The business case would be interesting to see.

The proposed Inland Rail link between Brisbane and Melbourne has promise.

Foreign investment clearly has attractions but may seek equity rather than providing debt capital.

The list of potential projects on p15 and 16 is interesting but again business cases are essential. Much is said about air freight but this is likely to be viable mainly for high quality meat products, sea food and high quality fruit and vegetables.

Infrastructure to support irrigation farming in northern Australia will need close examination. There have been many attempts to do this in the past, most of which failed due to climate problems and high numbers of insects, birds and other wildlife eg wallabies. Solutions may exist but need to be identified first.

Regulation standardisation and rationalisation are obvious candidates for attention. Much of this is underway re heavy vehicles and rail and needs to be vigorously pushed to avoid hold ups from vested interests.

The key infrastructure issue is how to define the infrastructure we need. This can be done by;

- Not asking traditional industry committees.
- Making decisions on sound business cases, not sentiment. There are many examples that ‘look good’ eg regional air freight hubs, but unless they are soundly based, they will not be an effective use of money.
- Encouraging better business skills in our farmers so they can better define the infrastructure they need.
- Encourage farmers to sell products to specific customers so they then know the infrastructure they need.
- Do commercially focussed business cases.
- Develop new models for funding infrastructure, which will likely require private sector investment and this will then require some kind of user pays. This user pays component will then need to feed into relevant business cases.

Working with the States and Territories

The current program of rationalising regulations in many sectors across Australia begun under the Rudd/Gillard Governments needs to be pursued with vigour.

Key points that need to be made regarding this rationalisation of regulation include:

- There are many vested interests that always wish the status quo to be maintained as it gives them a comparative advantage. This must be resisted firmly.
- There are two problems with making the Commonwealth progressively responsible for more areas of regulation in order to achieve national consistency;
 - The view within the Commonwealth public service that management is generic and therefore content free is fundamentally flawed. Moving a person from a senior role in one agency to be the Secretary of a quite unrelated agency is nonsense. The essence of management is setting priorities and it is very difficult to do this without content knowledge. Certainly, client capture is always an issue but there is no substitute for content knowledge.

- My experience of some 20 years in working with Commonwealth public servants showed that they are well qualified academically, keen and committed but often lack a commercial perspective. This may well come from being often third generation public servants, in an environment (Canberra) that has few business people other than those providing services to public servants. State public servants have the same issue regarding having a commercial perspective but by virtue of their location have more contact with business people.

It is suggested that major cultural change is required in the agriculture departments in the Commonwealth and the States as there has been significant client capture and many are deeply embedded in the industry committee approach that is now so inappropriate. Considerable culture change is needed within these agriculture departments.

Comments are made about environmental management legislation, including vegetation management. Vegetation management legislation passed previously was based on an inadequate understanding of the science involved and so was too harsh. Often, when this was changed, it seems to have been made too lenient. It should always be recognised that the main regulators of agriculture, and many other areas of the economy, are now the supply chains, not government. Environmental regulations must be made using sound science. Generally, when this has been done not only are better environmental outcomes achieved but improved profitability as well.

With agriculture, better environmental management generally leads to better soils and reduced use of fertiliser, pesticide, irrigation water and energy, all saving money, and often with improved yields.

Regarding climate change, a carbon price etc, the focus by many was on the costs, not the benefits. Many large companies outside agriculture, eg Westpac, National Australia Bank, News Corporation, Linfox Transport, have made substantial improvements to their carbon footprint, even to being carbon neutral, while making major savings from reduced energy use.

A suggestion was made during consultation that energy audits on farms be subsidised. There are two issues here;

- This is yet another example of people looking for a general subsidy. Farmers need to be taking a more commercial approach, and focus on saving money not on the cost of an audit.
- It is quite unnecessary and would be a rort for energy consultants, as farms in a region with similar operations would have virtually the same energy issues. A general subsidy would lead to the same audit report for everyone with only the name change at the top. Funding some case studies for others to use is worth considering.

The proposal for a National Cooperatives Law is critical. A national legal framework for cooperatives is essential and it is inevitable that sooner than later a cooperative will need to work nationally. The other proposal to allow external capital funding without ‘compromising member control’ may be sensible but it will be important for such cooperatives to have a Board of Directors with a balance of commercial skills. A Board of mainly farmers may have the skills required to manage a large commercial activity. A classic case in Qld is Golden Circle. It had a Board with mainly farmers and eventually failed as it did not make the commercial decisions needed.

Competition and Regulation

Competition

Competition is another area where it is difficult to separate commercial issues from sentiment.

Much has been said about ‘unfair low prices’ paid by supermarkets etc.

However, some, generally larger, farmers seem to be making an adequate return on investment, by being more efficient, as outlined in Appendix C.

Certainly, to sell milk for \$1 a litre, cheaper than bottled water, is difficult to understand. As more companies move into dairy processing to service Asian markets, it may be that this low price will lead to a shortage of white milk for the Australian market. South East Qld, where much of the better dairy land has now been built on, and where the climate is less conducive to dairying, may have issues with milk supply sooner than later at current low farm gate prices.

The following points are made:

- Better business skills by farmers appear to be important in negotiating with major buyers.
- Farmers who have got together in larger selling groups eg cooperatives may be better able to negotiate with large buyers.
- Both sides of the equation need to follow sound supply chain management principles, where both sides need to gain benefits. The 'Toyota' model could be studied. This model requires price transparency along the chain.

Using regulation to force 'fair prices' is unlikely to be effective.

Regulation

There is a case for a better definition of country of origin labelling. The current system is not clear to many.

However, many consumers buy on best value for money and not on sentiment so simply relying on 'Made in Australia' as the main element of competitiveness may be inadequate.

The regulatory issue surrounding genetically modified (GM) foods is complex. There are very large areas of land now used to grow GM crops and there has been no adverse reactions documented. Canola is a crop breeding programs using GM have been effective in improving yield etc. However, it should be remembered that canola itself is the product of a chemically induced mutation of the Brassica rape.

It would be unwise to totally ban GM crops in order to secure a perceived market advantage in being 'GM free' where this advantage is not clear.

Any environmental regulations need to be based on sound science and economics and should never ignore the growing role of supply chains as regulators. Growing consumer concern on the environment generally is leading to many large retail chains, restaurant chains etc increasingly requiring certified proof of good environmental management. Two examples are;

- The 'Better Cotton' movement, <http://bettercotton.org/>, where concerns over environmental impacts of cotton production have led a number of retail chains requiring proof of sound environmental management. The Australian cotton industry uses these principles and this has led to major reductions in its use of water and pesticide, environmental benefits and cost savings.
- The Global Roundtable for Sustainable Beef, <http://grsbeef.org/>, a grouping of key players along the beef supply chain aiming at defining the principles for sustainable beef production. With JBS involved, Australia's largest abattoir chain, it will be hard for our graziers to ignore this movement. The challenge is to see how better land use management can allow greater turnoff of better quality animals.

Finance, business structures and taxation

There is much angst mentioned in the media about debt levels in Australian agriculture and access to finance by farmers.

However, data presented in the Green Paper, with, for example, the quote from a submission from the ANZ Bank, suggests that the proportion of farms with significant debt is in the minority. However, data presented on p35 suggests that debt in the northern Australian cattle industry seems to be significant.

This draws further attention to the need for improved business skills, more effective business models to allow better access to business skills and continuing the move to higher value products and away from lower value commodities.

A key with access to capital, is that, in general, if an investor wishes to invest in Australian agriculture, then buying whole farms is still the only way. There appear to be few farms with a corporate structure whereby an outside investor can take an equity position. Developing new business models whereby equity can be purchased may be a useful way forward. This is discussed on p37 and is an issue which should be further investigated.

The issues raised on p38-39 re cooperatives are supported.

It would be worth considering how the services available through Industry Growth Centres for the 'food and agribusiness sector' could be extended to farms.

Proposals for long term concessional lending are not supported. The information in Appendix C: Characteristics of top performing farms, suggests that it is again a business skills and business models issue, not an access to capital or cost of capital issue.

The concepts of new superannuation products for farm investment and government bonds for agriculture infrastructure are strongly supported and worthy of more detailed consideration.

Any farm support scheme that could discourage farm consolidation is difficult to support. However, there may be a role for the Commonwealth in preparing several case studies on different ways that farms have been consolidated. In particular, where several farms have been 'merged' into one company, with the original owners receiving shares, and with a Board of Directors, may have real benefits as it means that the original owners do not completely lose their farms.

The proposals for increasing thresholds for Farm Managed Deposits (FMD) and increasing the off-farm income gap seem sensible. Making FMDs available to companies seems logical.

Depreciation schedules should reflect the actual period of use, especially when technology is changing fast and equipment can quickly become obsolete.

The usefulness of the Farm Financial Counselling program as a first point of contact and as a way to encourage farmers to become more financially literate and then move to use professional advisors is sound. This is almost an extension of the Business Enterprise Centres concept available for non-farm businesses.

Foreign Investment

The history of Australia shows our reliance on foreign investment.

Again, the issues of relevant business models comes to mind, in that there are few ways for non-farm investors, foreign or domestic, to take equity in a farm business. Encouragement of such new business models is a relevant activity for the Commonwealth.

The other key issue is why overseas superannuation funds are willing to invest in Australian agriculture while Australian superannuation funds seem less willing needs further investigation. Any aspects of legislation or regulation that inhibits Australian superannuation funds so investing needs careful evaluation.

Education, skills and training and labour

Generally, people seek work in a sector where there are reasonable salaries career prospects involved. If agriculture lacks workers it would be worth an investigation into salaries and contract employee conditions. Demand pull has to be the preferred model for attracting labour into agriculture, not subsidies.

As with many other sectors, agriculture is becoming more sophisticated and this means workers, and farmers, will need to have higher skills and different skills.

New ways of delivering training in these new skills will be needed, generally internet based. This of course raises the issue of adequate broadband.

The Wine Industry Training Centre at Stanthorpe in Qld is worth further analysis. This links a TAFE college with a high school at Stanthorpe, with nodes in other areas of wine production in Qld. The University of Southern Qld is also involved. See <http://www.qcwt.com.au/>.

Similar novel kinds of training alliances need to be considered.

Given that backpackers seem to be a key source of labour for farms, and also for non-farm businesses in many regional towns, the apparent unwillingness of younger Australians to take such employment needs further analysis. New kinds of employment agencies may be a way to assist younger people cope with this kind of on-going casual labour.

The environment scans of the Agrifood Skills Council have been remarkable for their insight into the skills issues of regional Australia.

The ability of farms to attract labour links again with the wider issue of business skills, business models and moving away from lower value commodities into higher value products.

National Centres of Excellence in agricultural training may well have a role but unless the dynamics of why people are not seeking rural work then such centres will not meet the needs of farmers. The jobs have to be there.

New rules for 457 visas and 417 visas are worth considering but not at the expense of Australians who are unemployed. New, more creative ways of encouraging people in areas of high unemployment to consider agriculture need to be developed. That some areas of Logan City have fifth generation unemployment is a national disgrace.

Drought

This is a difficult and an emotive issue, with the media showing scenes of real suffering, by farm owners and animals.

However, the 2013 Intergovernmental Agreement of Drought that was signed I 2013 should stand. This provided for assistance to plan for drought plus;

- The Farm Household Allowance, basically NewStart for farmers.
- A revised Farm Management Deposits scheme.
- Better social services, and tools and technologies to inform decision making.

This needs to be linked with;

- Workshop and on-line short business courses for farmers.

- Case studies on new business models for farmers to work together to tackle new products, new markets, new technologies etc. Such business models should include developing national networks of farmers who could provide agistment.
- National Cooperatives legislation, that allows non-farmers to be members and so bring capital and business skills to the enterprise.
- A major program on environmental management which includes R&D on land management, case studies and workshops so that farmers can access sound scientific and economic information on land management as a key part of drought planning.
- Further examination of new ways of providing drought insurance, as outlined on p67.

Support for ‘exceptional drought’ is a problem in that how would such an event be defined?

The point made by the Productivity Commission and others (including Alan Mitchell in the Australian Financial Review on 27 October 2014) needs emphasising, that drought subsidies simply encourage those who are marginally viable to stay on the farm and that this delays sensible farm rationalisation.

Water and natural resource management

Not only is water and natural resource management a logical and an essential part of farming from a scientific perspective, it is increasingly being required of farmers by supply chain leaders. Third party certification of good environmental management is increasingly being mandated by supply chain leaders to meet the requirements of their customers.

This requirement to have third party environmental certification is not a burden of itself. Certainly, for many farmers putting in the management systems required will be an effort and will cost some money. However, the feedback from precision farming, the Reef Rescue program and other management systems is that such a thorough approach pays off in reduced fertiliser and pesticide, less use of farm machinery giving less soil erosion and compaction, giving higher yields.

Programs such as Global GAP (Good Agricultural Practice), http://www.globalgap.org/uk_en/, initiated by supermarkets in Europe, are but one example of a systematic approach to environmental management.

Given that a significant proportion of Australia’s farmland is semi-arid extensive grazing, sound land use management is even more necessary.

The same issues apply to water management. Water is a critical resource that costs money and so sound management is not only essential and will be part of any third party certified audit of environmental management systems.

The Better Cotton approach mentioned above has allowed the Australian cotton industry to reduce water use by 40%. A water use efficiency program run by the Qld Government has been effective, see <https://www.business.qld.gov.au/industry/water/managing-accessing/accessing-water/rural-use-efficiency>. However, this program has been running for some years and it is interesting that such water conservation methods are not now standard and still need promotion and encouragement by government.

While it is true that there is notionally significant water available in northern Australia, the failure of previous efforts to develop large scale agriculture in northern Australia inform that there is no simple answer. Careful analysis is needed of this potential opportunity. New dams are spoken of but the evaporation rate in northern Australia needs to be considered. The Ord River dam has not been the success that was hoped when it was built.

The current policy of requiring Infrastructure Australia to consider all proposals to cost more than \$100M is strongly endorsed.

Some have suggested a payment to farmers for good land management, on p79. Assistance with weed and feral animal control is logical. However, such proposals need careful analysis as it could be argued that sound land use management is logical in terms of economically sustainable farming. The comment also on p79 that complying with land use legislation is onerous suggests that either the legislation was not based on sound science and economics or that farmers do not understand the benefits of sound land use management.

The experience in Qld of vegetation management legislation and the Wild Rivers legislation suggests that both of the above apply.

It may well also be that, especially in the semi-arid areas of Australia that more scientific research is needed on land use management. The work by CSIRO on satellite monitoring of pastures, the Pastures from Space program, would appear to be working.

The Green Army concept may be a useful work for the dole program but the long term benefits of such a program involving limited training needs to be carefully considered. There may well be a need for more people to be professionally trained in scientific land use management but this would normally be a university degree, not a VET Certificate.

Research development and extension.

The current system of R&D Corporations has been effective in supporting the industry based commodity agriculture in the past. A lot of good science has been done.

Whether it is the right science is difficult to ascertain.

However, the need to move to a system of agriculture that is based on companies and products rather than industries and commodities means that a different system is needed to support R&D.

Individual farms, or more likely farm cooperatives or networks, increasingly need to do proprietary R&D. Some of the larger agricultural companies such as the Australian Agricultural Company would also likely want to do proprietary R&D.

This means that the current R&D levy system may not be meeting the needs of Australian agriculture.

Regarding extension, in previous era of production driven agriculture, and where there was a world undersupply of food, extension was simply a matter of promoting good agricultural practice. Government provided services starting more than 100 years ago as there was a gap in the market.

Extension now needs to be a mix of advice on production systems linked to identification of target markets and hence which crop to grow, which animals to produce etc. This kind of advice can never be provided by government. It has to be by the private sector. There is really no alternative other than for farmers to pay for advice on markets. This is yet another reason for farmers working together in cooperatives or other ways to work together.

A quite different model is now needed for RD&E, linked with the need to move from agriculture based on industries and commodities to agriculture based on companies and markets.

This change is occurring anyway but there is much cultural resistance, a major knowledge gap and a need for new system to support R&D.

The following is proposed;

- Reduce compulsory R&D levies by say half and use the money for long term R&D needs.

- Allow farmers to access R&D Tax Incentives, using the money saved by the Commonwealth in reducing matching levy money.
- Develop a national legislative approach to cooperatives as a matter of urgency. This new legislation needs to allow non-farmers to be cooperative members so as to provide capital and business skills.
- Actively promote the formation of market based cooperatives and similar ways of bringing farms together to get economies of scale.
- Develop a form of the Industry Growth Centres program for agriculture, merging this with the Farm Financial Counselling program, and linking this with the Industry Growth Centre being developed for food and agribusiness. This should be done in liaison with the Institute of Management Consultants and the Agribusiness Association. Care will be needed not to duplicate services being provided by companies such as Landmark and Elders and companies such as Syngenta and IncitecPivot that provide seed and agricultural chemicals as well as advice on the use of these chemicals.
- Encourage farmers to develop locally owned, incorporated applied RD&E groups similar to the Birchip Cropping Group in NW Victoria, which does applied R&D on local needs and has its own extension officers. See <http://www.bcg.org.au/>.

Biosecurity

No comment is made other than to urge the development of a program of requiring those importing goods via container to report insects, rodents, reptiles etc in these containers to biosecurity authorities promptly. Biosecurity agencies need the staff to respond quickly to such reports so as to minimally inconvenience relevant businesses. This is not just an agricultural issue. Fire ants are an example of what can happen if not managed well. Indonesian barking geckos may be cute but fire ants are not.

Biosecurity must not be a subtle form of protection.

Accessing international markets

While there are real potential opportunities in Asia, we must be organised to have the products these markets want and the mechanism to get these products to those markets.

There is little choice for farmers to work together in cooperatives, networks, marketing companies or other corporate structures to be able to engage the staff to identify these opportunities and negotiate with buyers and transport companies.

The only alternative is to have others do this for them and reap the gains.

Market access and trade agreements are clearly important. However, nothing will drive a market opportunity like a company in the target market which wants to buy product from Australia lobbying their government to allow access. If our farmers cooperatives or similar identify such companies in target markets much will be solved.