

# Agri-business Sector Strategy

Shoalhaven City Council

November 2010



## Contents

1.	Introduction	1
1.1	Purpose	1
1.2	How this Strategy Works	1
1.3	Scope	2
1.4	Industry Overview	2
2.	Existing Situation	4
2.1	Grazing	5
2.2	Horticulture	7
2.3	Aquaculture	9
2.4	Forestry	11
3.	Strategic Objectives	12
4.	Strategies, Actions and Priorities	13
4.1	Whole of Agri-Business Sector Actions and Strategies	13
4.2	Grazing Sector Actions and Strategies	16
4.3	Horticulture Sector Actions and Strategies	17
4.4	Aquaculture Sector Actions and Strategies	18
4.5	Forestry Sector Actions and Strategies	19
5.	Summary of Actions and Priorities	20

# 1. Introduction

## 1.1 Purpose

The purpose of this strategy is to provide a clear direction for Shoalhaven City Council's (**Council**) involvement in the agri-business industry sector. Council intends to provide on-going support for existing, established and potential new agri-business industries and this strategy provides a basis for that support.

The agri-business sector has been a key component of the Shoalhaven economy with major industries being developed including dairying, forestry, fishing and various forms of intensive horticulture<sup>1</sup>. Council looks forward to a continued positive and productive relationship with the agri-business sector and its industry participants.

## 1.2 How this Strategy Works

This *Agri-Business Sector Strategy* forms the first instalment in a series of industry sector strategies to be produced by Council's Economic Development Office (**EDO**). The need for industry sector strategies, and the subsequent requirement for Council to produce such strategies, is identified under both Council's *Delivery Program and Operational Plan (2010-2011)*, as well as Council's economic development strategy "*Shoalhaven - an enterprising alternative*".

The *Agri-Business Sector Strategy* is based on a series of strategies and actions to support and address issues within the agri-business sector as a whole, or within individual segments of that industry.

The relationship between Council's strategic planning documents and this *Agri-Business Sector Strategy* is shown in the flow chart at Figure 1.

<sup>1</sup> Shoalhaven Country Centres Growth Strategy (2000)

Figure 1: Industry Sector Strategy Flowchart



### 1.3 Scope

This strategy seeks to outline the key elements of the agri-business sector, and in doing so, to identify its market segments, trends and the history of Council's interventions in the industry. The strategy also aims to identify future interventions which Council can implement, or work in partnership with others to implement, over the strategy period of five years (2011-2015).

The strategy is laid out in five primary sections as follows:

- Section 1: Includes the purpose, scope and a brief overview of the agri-business sector;
- Section 2: Provides a review of the existing situation within the agri-business sector, broken down into more detailed market segments, and including recent trends and a review of Council's past involvement in each segment;
- Section 3: Identifies the strategic objectives for Council's future involvement in the agri-business sector and the reasons for seeking to fulfil these objectives;
- Section 4: Establishes the future strategies and actions for Council (and others where applicable) in relation to the agri-business sector; and
- Section 5: Summaries all actions and provides indicative priorities for their implementation.

### 1.4 Industry Overview

The Shoalhaven's natural environment and rural setting plays a central role in the quality of life of the local community. The region's temperate coastal climate, rich array of native flora and fauna, many natural attractions, thriving commercial and retail sectors and abundance of raw materials make the Shoalhaven an appealing place to live and work<sup>2</sup>.

The agricultural sector plays a key role in establishing the character of the area. Green rolling hills characterise the gateway areas in the north of the Shoalhaven around Berry, providing a scenic welcome to visitors of the region. A similar character is present around the Milton-Ulladulla area, synonymous with the dairy industry and other low intensity grazing.

In-between these areas, as well as to the south of Ulladulla, the prevailing bush character suggests that agricultural activities are less visually prominent. However these bush areas comprise large tracts of State Forest, and accommodate key forestry reserves as well as areas of intensive horticulture.

The Shoalhaven is also synonymous with its fishing and seafood industries, including the oyster industry centred on Greenwell Point to the east of Nowra.

In total, the Shoalhaven's agricultural production was estimated to have a total gross value of around \$40.7 million in 2005/2006<sup>3</sup>, and whilst dairy farming remains a key industry within the agri-business sector, other industries are emerging such as land-based aquaculture and various small scale, but intensive horticultural pursuits<sup>4</sup>.

Council's comprehensive engagement process undertaken in preparing its new *Integrated Planning and Reporting Framework* in the later half of 2009, also identified the importance of a continued focus on the provision of farmers

---

<sup>2</sup> See [www.iris.org.au](http://www.iris.org.au) Shoalhaven Regional Profile

<sup>3</sup> National Regional Profile – Shoalhaven (ABS Catalogue no. 1379.0.55.001)

<sup>4</sup> See [www.iris.org.au](http://www.iris.org.au) Shoalhaven Regional Profile

markets and sustainable food production initiatives within the Shoalhaven. This connection between local food production and consumption was seen as an issue that is a particularly important focus for Council in respect to creating a sustainable agricultural sector.<sup>5</sup>

However the agri-business industry is not without its issues and concerns. Key issues within the sector include:

- ▶ High costs associated with the start-up of new medium or large scale agricultural activities due to rural land prices being increased through non-rural uses such as holiday homes;
- ▶ A general lack of knowledge of agriculture and appropriate land management practices amongst new rural land holders, resulting in the degradation of land and overall loss of prime agricultural capacity;
- ▶ Increasing pressure from urban and rural residential encroachment on farmland, including encroachment on buffers needed to ensure agricultural activities do not impact on residential homes;
- ▶ A need for improved, stronger and consistent land-use planning techniques to provide a basis for protecting prime agricultural reserves (see for example Case Study No. 1 in Section 2 of this document);
- ▶ Difficulty in attracting investment in emerging agri-business industries due to the risks and difficulties in obtaining necessary approvals and licences (primarily from the State Government);
- ▶ Increasing costs associated with trends towards organic and sustainable agriculture - although these are somewhat offset by changing consumer preferences and potential for carbon sequestration and other opportunities associated with climate-change;

- ▶ A lack of a centralised facility or area where rural land-holders, agricultural producers and associated bodies can obtain assistance, undertake research and establish a presence within the area (for example an agricultural “hub”); and
- ▶ Difficulty in sustaining agri-businesses when competing outside the region due to additional costs of transportation and wholesaling.

While the agri-business sector has significant future potential and a number of emerging opportunities, Council’s involvement requires close consideration of where sustained opportunities can be created that best benefit not only the industry, but also the broader Shoalhaven community. These opportunities are explored throughout this *Agri-Business Sector Strategy*.

---

<sup>5</sup> See *Report of Phase 2 Engagement Strategy- December 2009*

## 2. Existing Situation

This section provides a review of the various market segments that exist within the agri-business sector in the Shoalhaven. These include:

- ▶ Grazing - involving the grazing of livestock on land which is typically unimproved. This includes dairy and beef cattle, as well as specialist grazing types such as alpacas;
- ▶ Horticulture - deals with plant propagation and cultivation and involves working to improve crop yield, quality, nutritional value, and resistance to insects, diseases, and environmental stresses. This would include fruits, berries, nuts, vegetables, flowers, trees, shrubs and turf;
- ▶ Aquaculture - includes the farming and raising of ocean and freshwater animals and plants. This includes land based, water based and tank based activities; and
- ▶ Forestry - being the study and science of tree planting and maintenance. This would include plantation and native forestry, as well as related industries such as milling.

These market segments are detailed in the following sub-sections.

This section also provides a number of case study “boxes”, which outline examples of best practice, industry snapshots and other issues relevant to agri-business in the Shoalhaven. These case studies either highlight examples from outside the local government area (**LGA**) or are examples from within the LGA that provide a positive reflection of the potential within the Shoalhaven.

### CASE STUDY No. 1 - Northern Rivers Farmland Protection Project

The Northern Rivers Farmland Protection Project, undertaken by various NSW Government Departments in 2005, sought to protect important farmland from urban and rural residential development by mapping farmland and developing specific planning principles to be applied to areas in the north-east of the State.

The project put forward policies which can provide genuine long-term benefit to agriculture without imposing unnecessary restrictions on farmers, and whilst recognising the need to accommodate a growing population.

The projects mapping and land classification provides a valuable tool for planners in determining the suitability of land for agricultural use, as well as providing a consistent policy and information platform on which to base development decisions.



(Source: Northern Rivers Farmland protection Project Final Recommendations -- February 2005

see: [www.planning.nsw.gov.au](http://www.planning.nsw.gov.au))

## 2.1 Grazing

The Shoalhaven area has traditionally been known as an area with a strong dairy industry, and this sector remains a prominent agri-business industry in the region. In turn, the dairy industry provides the Shoalhaven with significant history and with a rural setting that is synonymous with the area.

The sector is predominantly comprised of family owned and operated farms with herd sizes between 100 and 1000 cows. Most farms milk between 150-200 cows, although there are a number of mid-sized farms milking 250-500 cows.<sup>6</sup> In 2005/2006, there was around 22,000 head of dairy cattle in the Shoalhaven<sup>7</sup>.

Another form of grazing that has grown significantly over time is the area beef cattle production. The beef cattle sector is a relatively small niche market, and in October 2009 the not-for-profit Shoalhaven Beef Producers' Association was formed to assist meeting the increasing education and production needs of beef producers in the Shoalhaven (also encompassing the Southern Highlands and Kiama). The key objectives of the Association are to provide a suitable representative body for beef producers in the region, networking opportunities, educational opportunities and to improve the quality and profitability of beef production for its members<sup>8</sup>.

There are also a large number of producers outside the association, which continue to provide for viable and at times very successful businesses. In total there were as estimated 18,500 meat cattle in the Shoalhaven in 2005/2006<sup>9</sup>.

A number of other smaller grazing sectors are also represented in the Shoalhaven, including alpacas, sheep and goats. Sheep and goats are generally

bred and grazed for weed control and land management purposes, rather than meat or wool production. Alpaca operations tend to have similar characteristics, though some wholesale production for meat or fleece purposes is present in the LGA.

In addition, other more confined animal farming also occurs at a relatively small scale, including pigs, poultry and apiary (bee keeping). Generally these aspects of the agricultural sector are small with few commercial operators. However opportunities exist for small scale business enterprises including farm-gate sales and value-added produce associated with these smaller specialist producers.

### 2.1.1 Trends

In the grazing area, there are a number of trends that can be seen, including:

- ▶ Increasing pressure on agricultural grazing land from development (particularly rural residential), as well as from more intensive forms of agriculture;
- ▶ Lower farmgate prices for milk, combined with increasing land costs, resulting in difficult conditions for new dairy farms to enter the market<sup>10</sup>;
- ▶ An increase in the leasing of rural land and resultant reluctance to provide active land management due to associated costs for the lessee;
- ▶ A general trend towards more sustainable and organic forms of grazing and farm management, consistent with consumer patterns and industry best practice;
- ▶ Increasing popularity of combined networks of similar producers, such as the Shoalhaven Beef Producers Association; and
- ▶ Increasing opportunities for producers to become involved in tourism opportunities such as farmgate trails and farm accommodation.

---

<sup>6</sup> *Current Situation for Agriculture in the Southern Illawarra* (URS 2003)

<sup>7</sup> National Regional Profile – Shoalhaven (ABS Catalogue no. 1379.0.55.001)

<sup>8</sup> See <http://www.shoalhavenbeef.blogspot.com/>

<sup>9</sup> National Regional Profile – Shoalhaven (ABS Catalogue no. 1379.0.55.001)

---

<sup>10</sup> *Current Situation for Agriculture in the Southern Illawarra – Part B* (URS 2003)

### 2.1.2 Past Strategies and Actions

Council has been involved in a variety of strategies and actions to support the grazing sector. However, as the dairy industry is of a size and scale that generally cannot be significantly influenced within local government boundaries, these interventions and actions have generally targeted smaller industry sectors including:

- ▶ Council has assisted in the organisation and development of the *Shoalhaven Beef Producers' Association*, and continues to provide in-kind support; and
- ▶ Council has commenced the co-ordination of a farmgate trail to be associated with the established *Hawkesbury Harvest* initiative<sup>11</sup>, and which has the potential to involve a range of agricultural producers (see Case Study No. 2).

---

<sup>11</sup> See [www.hawkesburyharvest.com.au](http://www.hawkesburyharvest.com.au)

#### CASE STUDY No. 2 – Hawkesbury Harvest Food Trail

In 2000, a small group of people passionate about the Hawkesbury and its agricultural heritage joined together to promote the fresh seasonal produce from the farms in the region.

Today, this community-based organisation continues to highlight the range of unique experiences that can be found in the Hawkesbury region and co-ordinates a number of promotions including:

1. A farmgate trail, which includes a complete itinerary, maps and other information for visiting a range of farmgate sales throughout both the Hawkesbury and other nearby regions;
2. Special Events to highlight and provide interaction between the Hawkesbury's agricultural producers and greater community;
3. Hawkesbury Harvest's Farmers & Fine Food Markets, held regularly in a number of locations; and
4. Industry Development including regional branding.

The food trail concept has spread from the Hawkesbury to include the Sydney Hill / Brooklyn Harvest Experience, the Penrith Valley Harvest Experience, the Wollondilly Harvest Experience, as well as a Hawkesbury Harvest Wine and Sake Trail.



Source: [www.hawkesburyharvest.com.au](http://www.hawkesburyharvest.com.au)

## 2.2 Horticulture

The horticultural industry covers a number of activities within the Shoalhaven, including grape production (viticulture), fruit and vegetable production, intensive horticulture (such as cut flowers and mushrooms), turf farming and berry/olive production.

In the context of production value, scale and associated opportunities, viticulture is a key industry within the Shoalhaven. The area is a wine region registered with the Australian Wine and Brandy Corporation (the “Shoalhaven Coast”) extending from Kiama through to Beagle Bay (near Batemans Bay)<sup>12</sup>. The earliest vineyards are recorded in Coolangatta, where *Coolangatta Estate* still operates today. Since the 1990’s, a number of specialist wineries have emerged, with a total of 16 cellar doors now in operation<sup>13</sup>.

Within the wider context of the viticulture industry nationally, the Shoalhaven Coast is not a major grape and wine region, and it will never become a bulk wine producer. However, its greatest importance is to the local region where it compliments a large and an expanding tourism industry, supplies local retailers and restaurants and employs people in grape growing, winemaking, cellar door sales and associated on-site restaurants and cafes.<sup>14</sup>

The Shoalhaven’s relatively consistent rainfall and mild climate also ensures good growing conditions for turf farming, which has expanded significantly in the area. Many of the local turf farms are associated with the *Turfco* brand, which are responsible for growing turf on about 100 hectares of farming land and supplying customers from Sydney’s North Shore to the Southern Highlands, Canberra and along the South Coast to Bega.

---

<sup>12</sup> See [www.wineaustralia.com](http://www.wineaustralia.com) wine regions.

<sup>13</sup> See [www.nswwine.com.au](http://www.nswwine.com.au) NSW wine regions – Shoalhaven Coast

<sup>14</sup> *Current Situation for Agriculture in the Southern Illawarra* (URS 2003)

A number of fruit and vegetable industries are also present within the Shoalhaven including a range of fruit, vegetable, olives, berries and other specialist horticultural enterprises. These industries are relatively small, with few commercial operators and a focus on local or regional markets rather than the highly competitive markets in Sydney.

More recently, a number of intensive agricultural activities have been pursued in the Shoalhaven, including intensive cut-flower and vegetable projects. These intensive forms of horticulture, which require capital intensive development of glass-houses or similar built structures, are recognised as being a key to future growth. However environmental requirements, including availability of water and compliance with strict “neutral or beneficial effect” (NorBE) requirements, may prove difficult for small-scale producers.<sup>15</sup>

### 2.2.1 Trends

Horticultural activities within the Shoalhaven are generally on the increase, with a number of positive attributes, such as favourable weather conditions and the low cost of coastal land compared with other areas in NSW, contributing to a likely continuation of this trend. More specifically, these trends include:

- ▶ Increasing local grape production: an estimated 500 tonnes or approximately 400,000 bottles are now produced annually<sup>16</sup>;
- ▶ Increasing environmental approval and licensing requirements, particularly for more intensive forms of horticulture such as turf farming and where capital intensive infrastructure such as glass houses are required;
- ▶ A general trend towards more sustainable and organic forms of horticulture, even within existing enterprises;

---

<sup>15</sup> Regional Review - Sydney and South East Region 2003 (NSW Agriculture)

<sup>16</sup> See [www.nswwine.com.au](http://www.nswwine.com.au) NSW wine regions – Shoalhaven Coast

- ▶ A need to provide value adding enterprises (eg. production of jams, oils and other consumables) to ensure viability of horticultural ventures such as berry and fruit production<sup>17</sup>; and
- ▶ Increasing opportunities for producers to become involved in tourism opportunities such as farmgate trails, farm-stays or and like ventures.

### 2.2.2 Past Strategies and Actions

Council has supported a number of horticultural initiatives, both as a key participant and sponsor. Such activities include:

- ▶ Sponsorship of the *Shoalhaven Coast Winter Wine Weekend*, which is co-ordinated by the Shoalhaven Coast Wine Industry Association;
- ▶ Involvement in the annual *Shoalhaven Food & Wine Show*, held at the Shoalhaven Entertainment Centre;
- ▶ Ongoing co-ordination of the South Coast Harvest Trail, to form part of the Hawkesbury Harvest farm-gate trail publication;
- ▶ Co-ordination of an initial Twilight Farmers Market, being a successful introduction of a co-ordinated and localised farmers market in Nowra; and
- ▶ Assistance from Council's Economic Development Office to businesses seeking to secure land and develop their horticultural businesses in the Shoalhaven (see for example Case Study No. 3).

#### CASE STUDY No. 3 – Gzone Pty Ltd

Gzone operates from the NSW Couth Coast town of Milton, producing cut flowers and running a small Dorper sheep stud in an intensive sustainable farm operation. From the outset, the company was set-up to run an environmentally responsible operation, recycle practically everything (including the water).

This operational philosophy has been used to demonstrate new age farming and sustainability. The farm is open for educational purposes, with schools and TAFE students being regular visitors. Tours provide information on hydroponics, recycling and sustainability.

Commencing operations in October 2000, the first Gerbera sales crop was picked 15 months later in January 2002. The farm now produces flowers throughout the year with plants grown on elevated benches in a hydroponic system, enabling the farm to create ongoing regional employment opportunities.



Source: [www.gzone.com.au](http://www.gzone.com.au)

<sup>17</sup> Regional Review - Sydney and South East Region 2003 (NSW Agriculture)

## 2.3 Aquaculture

A number of aspects contribute to the agri-business sector of aquaculture. This industry can be broadly divided into two areas, land based and water based aquaculture, and with each providing the potential for the production of both fresh water and marine animals and plants.

In the Shoalhaven, an established water based aquaculture industry exists, incorporating the Sydney rock oyster industry in the Shoalhaven/Crookhaven estuary and river systems. *Shoalhaven River Oysters Incorporated* provides an overarching body for the area, with a total of 15 members contributing up to 2.2% of total annual NSW production of Sydney rock oysters, which in turn represents 72% of the total aquaculture industry in the state<sup>18</sup>. Potential exists to improve and facilitate expansion this existing industry through a range of production and environmental improvements.

Land based aquaculture is a much smaller industry on the NSW South Coast, with few relatively small scale producers of fish. However, there are a number of potential opportunities that have been identified for the development of more large scale sustainable aquaculture systems. A report produced by NSW Fisheries in 2003 entitled *Information Directory for Investors: A Site Assessment Survey for Marine Aquaculture Facilities on the NSW Coastline* identifies a number of potential sites for aquaculture development in the Shoalhaven. More recent work has also been undertaken to assess the *Environmental and Socio-Economic Considerations for Aquaculture in Jervis Bay NSW*<sup>19</sup>, concluding that extensive shellfish or sea-weed aquaculture in Jervis Bay should be supported.

The *Ulladulla Future Park* has also been developed over a number of years, incorporating an integrated aquaculture facility with associated value-adding

---

<sup>18</sup> See <http://shoalhavenriveroysters.com.au/>

<sup>19</sup> Prepared by the Australian Government Fisheries Research and Development Corporation (June 2010)

tourism, research and educational potential. The concept is similar to the successful award-winning *Centre for Education and Research in Environmental Strategies* established in Melbourne (see Case Study No. 4).

The *Ulladulla Future Park* site is the former Ulladulla Sewage Treatment Site, which was decommissioned in November 2005. The Park provides a unique opportunity to showcase modern sustainable aquaculture techniques with business feasibility studies showing that a profitable business can be established following some initial capital input.

However despite the apparent capacity and viability of various aquaculture projects, there has only been relatively small scale investment.

### 2.3.1 Trends

Within the Shoalhaven, there are a number of trends with relevance to the aquaculture market. These include:

- ▶ The recent introduction of the University of Wollongong's *Shoalhaven Marine and Freshwater Centre*, providing a much greater impetus for further development of this industry sector;
- ▶ Continued recognition of the high quality seafood produced in Australia, for both the domestic and international markets;
- ▶ Increasing reliance on aquaculture to provide for demand in seafood to avoid degradation of natural systems;
- ▶ Continued demand for Sydney Rock Oysters, including those produced in the Shoalhaven;
- ▶ Recognition of the potential for algae and other emerging plant and animal products<sup>20</sup>, many of which can be developed in the Shoalhaven;

---

<sup>20</sup> See for example RIRDC publications 08/159 and 09/138.

- ▶ Future potential for large scale sea-weed aquaculture to provide for carbon off-sets; and
- ▶ Recognition of the potential (including on-going support research) for the implementation of a range of aquaculture facilities and ventures in the Shoalhaven including the *Ulladulla Future Park* and Jervis Bay developments discussed above.

### 2.3.2 Past Strategies and Actions

Council has worked with both the existing and potential future aquaculture markets within the Shoalhaven. Such initiatives include:

- ▶ Funding assistance to provide a baseline study for the environmental and socio-economic consideration for aquaculture in Jervis Bay (Published June 2010);
- ▶ Continued lobbying of State and Federal Governments to assist in the development of a viable land based aquaculture industry in the Shoalhaven;
- ▶ Shoalhaven Water's support for the launch of the Shoalhaven Oyster Inc. marketing and branding launch in 2008; and
- ▶ Shoalhaven Water's provision of a specific monitoring budget as a contribution to the Oyster Quality Assurance Program.

#### CASE STUDY No. 4 – CERES (Centre for Education and Research in Environmental Strategies)

CERES is an award winning, not-for-profit, environment and education centre and urban farm located by the Merri Creek in East Brunswick, Melbourne.

Built on a decommissioned municipal tip that was once a landfill and wasteland, today CERES is a thriving, vibrant community. Over 300,000 people visit CERES each year. Many more connect with us through our innovative program taking sustainable education directly to schools across Victoria.

CERES is recognised as an international leader in community and environmental practice. CERES undertakes a variety of related activities and industries including an Organic Farm, Market, Shop, Co-ops and Café, Permaculture and Bushfood Nursery, which are unique social enterprises. All waste and water on the site is recycled and much of the site is powered by renewable energy such as wind and solar.

CERES is a model for a possible future where innovation, sustainability, equity and connectedness are valued. Both as a place and a community, CERES is striving to create a new way of being.



Source: [www.ceres.org.au](http://www.ceres.org.au)

## 2.4 Forestry

A range of forestry and related industries exist on the NSW South Coast and the Shoalhaven. These industries include the areas of:

- ▶ Managed forests: typically under the control of Forests NSW, which is a public trading enterprise within NSW Department of Industry & Investment (NSW I&I);
- ▶ Plantation forests: including extensive and intensive areas with managed harvesting;
- ▶ Farm forestry: including forestry for the purposes of future harvesting and sale similar to more traditional cropping;
- ▶ Carbon offsets: which is a potential emerging industry associated with carbon capture and storage based on a carbon trading scheme; and
- ▶ Milling operations: being the aspect of the industry which translates the raw materials to sawn timber.

Timbered areas occupy about 35% of the south-east region of NSW, used for a variety of conservation, catchment protect and for harvesting of both hardwood and softwood timber<sup>21</sup>. While the Shoalhaven LGA comprises only part of this area, the industry is a significant employer, particularly in the southern areas of the LGA.

The major market producer is the State Government, through Forests NSW. Forests NSW operate their logging and forestry management through the Commonwealth's Regional Forestry Agreement process, harvesting over 2.5million cubic metres of logs and over 1.5million cubic metres of pulpwood and other products every year throughout NSW<sup>22</sup>. Within the Shoalhaven, Forests

NSW areas are not considered to be highly productive forests, and low intensity forestry management processes are in place.

Key issues in the area of managed forests include a range of issues common to other areas of agriculture. These include urban encroachment, heavy vehicle access, changing consumer preferences to more sustainable production methods, as well as more localised issues such as illegal dumping and unauthorised recreation in State Forests (particularly off-road motorcycles).

Key milling operations take place in Nowra and Ulladulla, and whilst the number of mills is understood to have reduced over a number of years, there is a need for value adding technology and investment in these mills, rather than emergence of new or additional mills.

Costs associated with milling of small areas, combined with high land prices are generally prohibitive to the establishment of new farm forestry enterprises, however the industry has the potential for significant change should carbon offset opportunities continue to arise.

### 2.4.1 Trends

Trends within the forestry segment of agri-business include:

- ▶ A relatively static output, largely dependent on Regional Forestry Agreements and market demands;
- ▶ Some downturn in sales (particularly export pulp) due to the high value of the Australian dollar; and
- ▶ Continued research and investment in potential for carbon sequestration through farm forestry, though no significant targeted implementation is known to have occurred in the Shoalhaven.

### 2.4.2 Past Strategies and Actions

Council has not undertaken any recent actions with respect to the forestry sector.

---

<sup>21</sup> Regional Review - Sydney and South East Region 2003 (NSW Agriculture)

<sup>22</sup> See [www.dpi.nsw.gov.au/forests/about-forests-nsw](http://www.dpi.nsw.gov.au/forests/about-forests-nsw)

### 3. Strategic Objectives

This section establishes Council’s strategic objectives for the agri-business sector. These strategic objectives provide an outline of Council’s future involvement and commitment to this important industry sector and its potential for economic and jobs growth in the Shoalhaven.

The strategic objectives consider the current situation, trends and past involvement of Council within the agri-business sector as outlined in Section 1.4

and Section 2, whilst ensuring a pragmatic and focused approach to Council’s future involvement in the sector.

The strategic objectives and a brief explanation of their importance are set out in Table 1 below.

**Table 1: Agri-Business Sector Strategic Objectives**

Strategic Objective	Reason
Strategic Objective 1: <i>To provide for the on-going viability of a range of agri-business sectors through appropriate land use planning</i>	To ensure that land use planning policies and documents, including Council’s Local Environmental Plan (LEP), effectively recognise the need for and relationship between agriculture and other land uses.
Strategic Objective 2: <i>To maintain the sense of rural aesthetic synonymous with the Shoalhaven</i>	To protect and, where possible, enhance the visual character of the area through the appropriate retention of key views and vistas, and through the considered placement of more intensive and non-rural uses (including ancillary uses) which may diminish this character.
Strategic Objective 3: <i>To ensure that growth of the agri-business can be achieved through intensification of the industry in appropriate circumstances</i>	To recognise that growth in the agri-business sector is likely to be directly linked to more intensive forms of agriculture, and that such intensification should be encouraged if appropriately planned (taking into consideration other strategic objectives).
Strategic Objective 4: <i>To provide opportunities for, and to promote, direct contact between consumers and producers wherever possible</i>	To encourage a more direct relationship between consumers and producers that results in better returns for producers by removing additional steps in the supply chain, reducing reliance on produce and goods from outside the region, and to raise awareness of local produce and products available within the agri-business sector.
Strategic Objective 5: <i>To establish an understanding of the agri-business sector through education, training and mentoring programs</i>	To assist in developing a mutual understanding between producers, Council staff and the general public with respect to the importance of agriculture, as well as providing and contributing towards the knowledge and practices of producers to ensure on-going viability and business development.
Strategic Objective 6: <i>To provide for active support in developing and encouraging growth of new and existing agri-business enterprises</i>	To assist in the creation of economic development and ultimately employment opportunities within the Shoalhaven.

## 4. Strategies, Actions and Priorities

This section establishes the strategies, actions and priorities for Council (and others where applicable) in relation to the agri-business sector.

The term “strategies” is used to describe the overarching activity to be undertaken, lead or instigated by Council, and which may utilise existing industry groups, project partners and others to assist in their implementation. “Actions” are the actual steps in undertaking the strategies, and are provided in a form that can be measured and reported on. Timing and responsibilities have been provided for indicative purposes.

The actions and strategies within this section seek to directly address and relate to the Strategic Objectives identified in Section 3, as well as considering the issues and trends identified in Section 1.4 and Section 2.

### 4.1 Whole of Agri-Business Sector Actions and Strategies

The following strategies are applicable to multiple or all market segments of the agri-business sector.

#### **Strategy 1: Develop education strategies on Shoalhaven agriculture**

**Purpose:** To raise awareness of the value and diversity of the agri-business sector in the Shoalhaven, and in doing so, encourage greater participation in locally and regionally produced goods.

**Related Strategic Objectives:**

- ▶ Strategic Objective 4: To provide opportunities for, and to promote, direct contact between consumers and producers wherever possible; and
- ▶ Strategic Objective 5: To establish an understanding of the agri-business sector through education, training and mentoring programs.

**Proposed Actions:**

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<p><i>Action 1.1</i> – Develop a strategy for marketing of Shoalhaven agriculture to Shoalhaven residents with opportunities such as:</p> <ul style="list-style-type: none"> <li>• Contribution towards the annual “Small Farms Field Day” event, previously co-ordinated by the Southern Council’s Group (SCG); and</li> <li>• Preparation and display of agricultural history posters or event at one of Council’s facilities (eg. Entertainment Centre or Administration Centre)</li> </ul>	Short-term	Council (EDO)
<p><i>Action 1.2</i> – Undertake a series of workshops or similar educational sessions with key Council staff to raise awareness of the agri-business sector</p>	Medium-term	Council (EDO), (SCG/NSW I&I)

**Monitoring:** Monitoring provisions to be included within each marketing strategy initiative. Provide for feedback forms at Council sessions for monitoring of effectiveness.

**Strategy 2: Review Draft LEP to address potential conflicts between agri-business growth and land-use planning restrictions**

**Purpose:** To ensure consistency with Council’s direction with respect to agri-business growth, and the overriding land use planning document.

**Related Strategic Objectives:**

- ▶ Strategic Objective 1: To provide for the on-going viability of a range of agri-business sectors through appropriate land use planning; and
- ▶ Strategic Objective 2: To maintain the sense of rural aesthetic synonymous with the Shoalhaven.

**Proposed Actions:**

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 2.1</i> – Undertake informal discussions with Council’s strategic planning unit about the requirements for agri-business with respect to land-use planning and potential LEP provisions	Short-term	Council (EDO in association with Strategic Planning), NSW I&I
<i>Action 2.2</i> – Undertake a formal review and make a submission to the Shoalhaven Draft LEP once exhibited for public comment	As required	Council (EDO)
<i>Action 2.3</i> – Monitor, review and provide clear planning guidance for the implementation of agri-business initiatives within the Shoalhaven	Long-term	Council (EDO / Strategic Planning)

**Monitoring:** Undertake informal monitoring of development applications and their outcomes once the new LEP becomes operational. Should land-use planning implications adversely impact on agri-business development, appropriate requests for amendment to the LEP would then be sought.

**Strategy 3: Consider the need for a comprehensive planning strategy for protection of rural agricultural land**

**Purpose:** To provide sufficient and comprehensive information on which to base planning decisions and policies for the on-going protection of high quality agricultural lands.

**Related Strategic Objective:**

- ▶ Strategic Objective 1: To provide for the on-going viability of a range of agri-business sectors through appropriate land use planning

**Proposed Actions:**

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 3.1</i> – Initiate discussions with NSW I&I to determine the need and viability of undertaking a pilot study for the Shoalhaven based on the <i>Northern Rivers Farmland Protection Project</i>	Short-term	Council (EDO / Strategic Planning)
<i>Actions 3.2</i> – Subject to the outcomes of preliminary discussions with NSW I&I, undertake a business case for partial funding of a pilot farm land protection project by Council including opportunities for application of external funding grants	Medium-term	Council (EDO)

**Monitoring:** Council reporting as required.

**Strategy 4: Investigate the need and capacity for Council to provide a dedicated agricultural hub**

**Purpose:** To provide a centralised range of services, facilities, leasing options to enable small scale intensive horticulture, test plots and complimentary uses.

**Related Strategic Objectives:**

- ▶ Strategic Objective 1: To provide for the on-going viability of a range of agri-business sectors through appropriate land use planning;
- ▶ Strategic Objective 3: To ensure that growth of the agri-business can be achieved through intensification of the industry in appropriate circumstances;
- ▶ Strategic Objective 4: To provide opportunities for, and to promote, direct contact between consumers and producers wherever possible; and
- ▶ Strategic Objective 6: To provide for active support in developing and encouraging growth of new and existing agri-business enterprises.

**Proposed Actions:**

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 4.1</i> – Investigate opportunities to utilise land at Anderson’s Lane (Berry) for an agricultural “hub”, with appropriate zoning and associated planning controls	Short-term	Council (EDO in association with Property)
<i>Actions 4.2</i> – Pending the outcome of Action 4.1, undertake a feasibility study for an agricultural “hub” facility at Anderson’s Lane (Berry), or an alternative location to be identified as part of the feasibility study	Medium-term	Council (EDO)

**Monitoring:** Feasibility and options explored and progressed as per the outcomes of appropriate detailed studies.

**Strategy 5: Establish business case and project funding requirements for dedicated Agri-Business officer and programs**

**Purpose:** To establish a basis for funding opportunities to assist in creating long-term viable agri-business, education and training as identified throughout this strategy.

**Related Strategic Objectives:**

- ▶ All strategic objectives relate to this strategy.

**Proposed Actions:**

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 5.1</i> – Establish an outline of potential activities, programs and responsibilities for a dedicated agri-business (or similar) officer in consultation with potential project partners (such as Healthy Cities Illawarra and <i>Illawarra Biodiversity and Food Project</i> which achieved \$1.1m in grant funding)	Short-term	Council (EDO in association with applicable external organisations)
<i>Actions 5.2</i> – Develop an outline funding proposal for a dedicated agri-business officer to be used as and when applicable funding opportunities arise	Medium-term	Council (EDO)
<i>Action 5.3</i> – Pending funding availability, employ a dedicated agri-business officer to co-ordinate programs and activities associated with the agri-business sector	Long-term	Council

**Monitoring:** Council reporting as required.

## 4.2 Grazing Sector Actions and Strategies

The following strategies are applicable to the grazing market segment of the agri-business sector.

**Strategy 6: Ensure greater awareness of available assistance to rural property owners/purchases**

**Purpose:** To ensure future owners of rural land are aware of the need for good land management, avenues for available assistance and the responsibilities of being a rural land owner in the Shoalhaven.

### Related Strategic Objectives:

- ▶ Strategic Objective 2: To maintain the sense of rural aesthetic synonymous with the Shoalhaven; and
- ▶ Strategic Objective 5: To establish an understanding of the agri-business sector through education, training and mentoring programs.

### Proposed Actions:

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 6.1 – Prepare a “start-up rural land owners kit” designed to assist new rural land owners to understand the availability of information and assistance in land management and agricultural information (similar to Goulburn Mulwaree Council’s The Rural Living Handbook: A guide rural residential landholders)</i>	Medium-term	Council (EDO)

**Monitoring:** Number of kits provided and anecdotal feedback from service providers contacted.

**Strategy 7: Work in co-operation with other service providers to establish industry specific mentoring to increase viability of enterprises**

**Purpose:** To ensure that existing and fledgling enterprises are able to grow effectively and receive dedicated advice during critical phases of business growth.

### Related Strategic Objectives:

- ▶ Strategic Objective 5: To establish an understanding of the agri-business sector through education, training and mentoring programs; and
- ▶ Strategic Objective 6: To provide for active support in developing and encouraging growth of new and existing agri-business enterprises.

### Proposed Actions:

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 7.1 – In co-operation with other regional and local services providers, undertake targeted mentoring programs to assist in the ongoing development of key industries (for example the Shoalhaven Beef Producers’ Association)</i>	Medium-term	Council (EDO), SCG, NSW I&I

**Monitoring:** Mentoring opportunities taken-up and feedback provided from participants.

### 4.3 Horticulture Sector Actions and Strategies

The following strategies are applicable to the horticultural market segment of the agri-business sector.

**Strategy 8: Establish a Farmgate Trail network, based on the Hawkesbury Harvest model**

**Purpose:** To establish and encourage the closer connection of farm enterprises and direct consumers through a value adding tourism opportunity.

**Related Strategic Objectives:**

- ▶ Strategic Objective 4: To provide opportunities for, and to promote, direct contact between consumers and producers wherever possible; and
- ▶ Strategic Objective 6: To provide for active support in developing and encouraging growth of new and existing agri-business enterprises.

**Proposed Actions:**

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 8.1</i> – Convene and co-ordinate interested parties and establish contact and/or appropriate arrangements for inclusion in the <i>Hawkesbury Harvest</i> publication	Short-term	Council (EDO)
<i>Action 8.2</i> – Undertake promotional activities to highlight commencement of the Shoalhaven version of the <i>Hawkesbury Harvest</i> trail, including appropriate media and advertising initiatives	Short term	Council (EDO, Tourism, Media)

**Monitoring:** Operator records of farmgate visitation through standard check-list to be provided by Council.

**Strategy 9: Establish regular farmers markets in key locations**

**Purpose:** To establish and encourage the closer connection of farm enterprises and direct consumers through co-ordinated market opportunities in the northern and southern centres of the Shoalhaven.

**Related Strategic Objectives:**

- ▶ Strategic Objective 4: To provide opportunities for, and to promote, direct contact between consumers and producers wherever possible; and
- ▶ Strategic Objective 5: To establish an understanding of the agri-business sector through education, training and mentoring programs.

**Proposed Actions:**

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 9.1</i> – Commence regular fortnightly or monthly twilight farmers markets under the current approval in the Shoalhaven Entertainment Centre (SEC) forecourt, with a view to being self-sustaining within one year	Short-term	Council (EDO, SEC)
<i>Action 9.2</i> – Investigate, obtain appropriate approvals and undertake twilight farmers markets in the southern portion of the LGA (Milton-Ulladulla area) in a similar format to the above with alternating weeks/fortnights	Medium-term	Council (EDO)

**Monitoring:** Participation (number) of stall holders and anecdotal evidence of customer numbers. Review after one year.

#### 4.4 Aquaculture Sector Actions and Strategies

The following strategies are applicable to the aquaculture market segment of the agri-business sector.

##### **Strategy 10: Facilitate the establishment of land based aquaculture**

**Purpose:** To assist in the development of intensive aquaculture and associated employment opportunities.

**Related Strategic Objectives:**

- ▶ Strategic Objective 3: To ensure that growth of the agri-business can be achieved through intensification of the industry in appropriate circumstances; and
- ▶ Strategic Objective 6: To provide for active support in developing and encouraging growth of new and existing agri-business enterprises.

**Proposed Actions:**

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 10.1</i> – Continue to lobby the State Government to support the establishment of aquaculture in Jervis Bay through the preparation of environmental assessment and “implementation ready” lease plots	Ongoing	Council (EDO)
<i>Action 10.2</i> – Support the development of the <i>Ulladulla Future Park</i> concept, with appropriate assistance and advice as required	Ongoing	Council (EDO)

**Monitoring:** Council reporting as required.

##### **Strategy 11: Work co-operatively with existing aquaculture industry and research organisations**

**Purpose:** To ensure the ongoing development of the existing Sydney Rock Oyster industry, and to increase opportunities for aquaculture in general through new and on-going research projects.

**Related Strategic Objectives:**

- ▶ Strategic Objective 3: To ensure that growth of the agri-business can be achieved through intensification of the industry in appropriate circumstances;
- ▶ Strategic Objective 5: To establish an understanding of the agri-business sector through education, training and mentoring programs; and
- ▶ Strategic Objective 6: To provide for active support in developing and encouraging growth of new and existing agri-business enterprises.

**Proposed Actions:**

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 11.1</i> – Provide in-kind support to the <i>Shoalhaven Marine and Freshwater Centre</i> for undertaking research to assist the oyster industry in co-ordinating and sharing information and knowledge	Short-term	Council (Environment)
<i>Action 11.2</i> – Continue to work as required with the <i>Shoalhaven Marine and Freshwater Centre</i> to develop and implement aquaculture opportunities within the Shoalhaven	Ongoing	Council (EDO)

**Monitoring:** Council reporting as required.

#### 4.5 Forestry Sector Actions and Strategies

The following strategies are applicable to the farm forestry market segment of the agri-business sector.

**Strategy 12: Work co-operatively with Forests NSW and others as required**

**Purpose:** To ensure the ongoing viability of the timber industry in the area, and in so doing, ensure appropriate investment of Council resources to assist its development.

**Related Strategic Objectives:**

- ▶ Strategic Objective 1: To provide for the on-going viability of a range of agri-business sectors through appropriate land use planning; and
- ▶ Strategic Objective 6: To provide for active support in developing and encouraging growth of new and existing agri-business enterprises.

**Proposed Actions:**

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<p><i>Action 12.1</i> – Continue to work as required with the Forests NSW and others to develop appropriate directions on issues such as:</p> <ul style="list-style-type: none"> <li>• Urban encroachment on State Forests boundaries;</li> <li>• Discouraging illegal dumping of waste and vehicles in State Forests;</li> <li>• Discouraging unauthorised recreational activities (such as motorbike riding) in State Forests; and</li> <li>• Maintaining and improving road access for heavy vehicles.</li> </ul>	On-going	Council (EDO)

<i>Action</i>	<i>Timing</i>	<i>Responsibility</i>
<i>Action 12.2</i> – Investigate opportunities for carbon-offset and other climate change opportunities relating to the forestry sector	Medium	Council (EDO)

**Monitoring:** Council reporting as required.

## 5. Summary of Actions and Priorities

This section provides a summary of all actions proposed within this *Agri-Business Sector Strategy*. These actions are arranged by indicative timing and with consideration of the priorities of Council. In this respect, Council priorities will

continue to be based on economic development and opportunities for jobs growth. Whilst all strategies and actions are considered important, actions with a higher priority will be progressed in the first instance where resourcing constraints exist.

**Table 2: On-going (or as required) Priorities**

<i>Action</i>	<i>Current Priority</i>
<i>Action 2.2</i> – Undertake a formal review and make a submission to the Shoalhaven Draft LEP once exhibited for public comment	<i>High</i>
<i>Action 10.1</i> – Continue to lobby the State Government to support the establishment of aquaculture in Jervis Bay through the preparation of environmental assessment and “implementation ready” lease plots	<i>Medium</i>
<i>Action 10.2</i> – Support the development of the <i>Ulladulla Future Park</i> concept, with appropriate assistance and advice as required	<i>Medium</i>
<i>Action 11.2</i> – Continue to work as required with the <i>Shoalhaven Marine and Freshwater Centre</i> to develop and implement aquaculture opportunities within the Shoalhaven	<i>Medium</i>
<i>Action 12.1</i> – Continue to work as required with the Forests NSW and others to develop appropriate directions on issues such as: <ul style="list-style-type: none"> <li>• Urban encroachment on State Forests boundaries;</li> <li>• Discouraging illegal dumping of waste and vehicles in State Forests;</li> <li>• Discouraging unauthorised recreational activities (such as motorbike riding) in State Forests; and</li> <li>• Maintaining and improving road access for heavy vehicles</li> </ul>	<i>Low</i>

**Table 3: Short-Term Priorities (2010-2012)**

<i>Action</i>	<i>Current Priority</i>
<i>Action 2.1</i> – Undertake informal discussions with Council’s strategic planning unit about the requirements for agri-business with respect to land-use planning and potential LEP provisions	<i>High</i>
<i>Action 4.1</i> – Investigate opportunities to utilise land at Andersons’s Lane (Berry) for an agricultural “hub”, with appropriate zoning and associated planning controls	<i>High</i>
<i>Action 8.1</i> – Convene and co-ordinate interested parties and establish contact and/or appropriate arrangements for inclusion in the <i>Hawkesbury Harvest</i> publication	<i>High</i>
<i>Action 8.2</i> – Undertake promotional activities to highlight commencement of the Shoalhaven version of the <i>Hawkesbury Harvest</i> trail, including appropriate media and advertising initiatives	<i>High</i>
<i>Action 1.1</i> – Develop a strategy for marketing of Shoalhaven agriculture to Shoalhaven residents with opportunities such as: <ul style="list-style-type: none"> <li>• Contribution towards the annual “Small Farms Field Day” event, previously co-ordinated by the Southern Council’s Group (SCG); and</li> <li>• Preparation and display of agricultural history posters or event at one of Council’s facilities (eg. Entertainment Centre or Administration Centre)</li> </ul>	<i>Medium</i>
<i>Action 9.1</i> – Commence regular fortnightly or monthly twilight farmers markets under the current approval in the Shoalhaven Entertainment Centre (SEC) forecourt, with a view to being self-sustaining within one year	<i>Medium</i>
<i>Action 11.1</i> – Provide in-kind support to the <i>Shoalhaven Marine and Freshwater Centre</i> for undertaking research to assist the oyster industry in co-ordinating and sharing information and knowledge	<i>Medium</i>
<i>Action 3.1</i> – Initiate discussions with NSW I&I to determine the need and viability of undertaking a pilot study for the Shoalhaven based on the <i>Northern Rivers Farmland Protection Project</i>	<i>Low</i>
<i>Action 5.1</i> – Establish an outline of potential activities, programs and responsibilities for a dedicated agri-business (or similar) officer in consultation with potential project partners (such as Healthy Cities Illawarra and <i>Illawarra Biodiversity and Food Project</i> which achieved \$1.1m in grant funding)	<i>Low</i>

**Table 4: Medium-Term Priorities (2012-2014)**

<i>Action</i>	<i>Current Priority</i>
<i>Action 6.1</i> – Prepare a “start-up rural land owners kit” designed to assist new rural land owners to understand the availability of information and assistance in land management and agricultural information (similar to Goulburn Mulwaree Council’s <i>The Rural Living Handbook: A guide rural residential landholders</i> )	<i>High</i>
<i>Action 7.1</i> – In co-operation with other regional and local services providers, undertake targeted mentoring programs to assist in the ongoing development of key industries (for example the <i>Shoalhaven Beef Producers’ Association</i> )	<i>High</i>
<i>Action 9.2</i> – Investigate, obtain appropriate approvals and undertake twilight farmers markets in the southern portion of the LGA (Milton-Ulladulla area) in a similar format to the above with alternating weeks/fortnights	<i>High</i>
<i>Action 1.2</i> – Undertake a series of workshops or similar educational sessions with key Council staff to raise awareness of the agri-business sector	<i>Medium</i>
<i>Actions 4.2</i> – Pending the outcome of Action 4.1, undertake a feasibility study for an agricultural “hub” facility at Anderson’s Lane (Berry), or an alternative location to be identified as part of the feasibility study	<i>Medium</i>
<i>Action 12.2</i> – Investigate opportunities for carbon-offset and other climate change opportunities relating to the forestry sector	<i>Medium</i>
<i>Actions 3.2</i> – Subject to the outcomes of preliminary discussions with NSW I&I, undertake a business case for partial funding of a pilot farm land protection project by Council including opportunities for application of external funding grants	<i>Low</i>
<i>Actions 5.2</i> – Develop an outline funding proposal for a dedicated agri-business officer to be used as and when applicable funding opportunities arise	<i>Low</i>

**Table 5: Long-Term Priorities (2014+)**

<i>Action</i>	<i>Current Priority</i>
<i>Action 2.3</i> – Monitor, review and provide clear planning guidance for the implementation of agri-business initiatives within the Shoalhaven	<i>Medium</i>
<i>Action 5.3</i> – Pending funding availability, employ a dedicated agri-business officer to co-ordinate programs and activities associated with the agri-business sector	<i>Medium</i>

***Agri-Business Sector Strategy***  
**Rev 1. Issued 23 November 2010**

Locale Consulting Pty Ltd

Report prepared by Steve Thompson (B EnvPlan (Hons) MPIA CPP)

33 River Road

Shoalhaven Heads NSW 2535

t: (02) 44485937 e: [info@localeconsulting.com.au](mailto:info@localeconsulting.com.au) w: localeconsulting.com.au

This document is and shall remain the property of Locale Consulting Pty Ltd. The document may only be used for the purpose for which it was commissioned and in accordance with the Terms of Engagement for the commission. Unauthorised use of this document in any form whatsoever is prohibited.