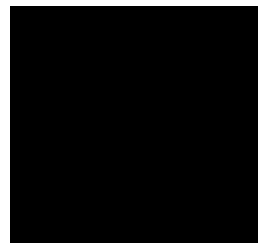


Department of Agriculture, Fisheries and Forestry
PO BOX 858
Canberra ACT 2601



21 December 2023

Agriculture and Land Sectoral Plan Submission

Dear Department of Agriculture, Fisheries and Forestry,
CC: Minister Watt, Minister Plibersek and Minister Bowen,

[REDACTED] welcomes the opportunity to provide this submission in response to the *Agriculture, Land and Emissions Discussion Paper*.

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Please see our response to the questions posed in the discussion paper below:


Barriers & opportunities

Recognising deforestation & protecting forests and bushland

Australia's high conservation value (HCV)¹ forests and bushlands store vast amounts of carbon and are a key component of the global carbon cycle. They sustain Australia's native plants and animals and are essential to our survival and well-being, providing clean air and water, food, recreation and many other ecosystem services.

However, unfortunately Australia is now recognised as a global deforestation hotspot. Deforestation (logging and land clearing) stands alongside climate change as Australia's greatest environmental crisis with about 350,000 hectares cleared in Queensland between 2020-21 alone, and logging continuing in carbon-dense forests that are also mega-biodiverse and home to Critically Endangered species. Beef production is overwhelmingly the key driver of deforestation and land clearing in Queensland, the state which is cementing Australia on the list of

¹ <https://www.hcvnetwork.org/hcv-approach>



deforestation hotspots. At least 69% of which was linked to beef.

The agriculture and land sector plan can only be credible if it recognises the contribution of deforestation to Australia's emissions, given it is the second largest cause of agricultural emissions after enteric methane. The average annual emissions from tree clearing from 2013 to 2017 was 31 Mt CO₂eq, with about 75% of deforestation attributable to agriculture (2010-2014²). This represents over 6% of Australia's annual emissions³.

The importance of protecting and restoring Australia's forests and bushlands, the impacts of land clearing on these carbon stocks and the deep inadequacy of tree planting as an emissions reduction strategy is demonstrated in the Land Gap report:

*'Current carbon accounting practices fail to recognize that carbon lost from primary forests is not offset by planting trees. With lower ecosystem integrity in monoculture systems, susceptibility to extreme events, and the risk of carbon loss, are higher. Harvesting mature trees with the expectation of re-growth creates a decades-long carbon debt by permanently reducing the carbon stored in the landscape and increasing the stock in the atmosphere... These deficiencies would be addressed if governments were to adopt a more comprehensive approach to carbon accounting based on stocks and flows that allows the true change in the carbon stock of the atmosphere to be defined and the mitigation benefits of forests and other ecosystems to be recognized.'*⁴

While Land Use, Land-Use Change and Forestry (LULUCF) is currently a net carbon sink in Australia, it is not acknowledged in the discussion paper that this is a net figure and that the emissions from vegetation removal and clearing are a cause for deep concern. The carbon stores in remnant forests and bushlands are irreplaceable carbon that cannot be restored by 2050.

Vegetation removal has significant biodiversity impacts. Deforestation can cause extinction, reduce biodiversity and lead to ecosystem collapse and other tipping points that result in further mass emissions of carbon. These events can in turn fuel further climate change and natural disasters, creating a circular loop of biodiversity decline and carbon emissions.

A lack of nationally consistent data

The lack of accessible and transparent data at a national level is currently a barrier to meaningful action. Australia is unable to consistently report on deforestation (both from logging and land clearing) in an accurate, transparent and timely manner. The current National Carbon Accounting System (NCAS) cannot accurately measure emissions from deforestation and therefore national reporting is substantially underreporting land clearing and logging emissions under the United Nations Framework Convention on Climate Change.

Good, strong data is critical to understanding deforestation and associated emissions and monitoring the effectiveness of policy responses and action. The default dataset on national vegetation cover and health has become the National Greenhouse Gas Inventory (NGGI) which is

² Meyer, Rachelle & Doran-Browne, Natalie & Dooley, Kate & Eckard, Richard. (2020). Achieving net negative emissions in a productive agricultural sector A review of options for the Australian agricultural sector to contribute to the net-zero economy. 10.13140/RG.2.2.15619.84002

³ According to Australia's greenhouse gas emissions: December 2022 quarterly update, emissions were 463.9 million tonnes of CO₂ eq. In the year to December 2022.

⁴ Keith, Mackey, Young, & Sonia Hugh (Griffith University). Forest ecosystem protection and restoration. In The LandGap Report (2022)



used for international reporting on national emissions annually.

The federal government, industries and corporations are currently employing this data to determine vegetation loss and gain across Australia. This is problematic because of poor data fidelity inappropriately representing the full extent of vegetation change.

Using the NGGI data is a poor proxy for assessing deforestation nationally, due to narrow definitions, opaque methods and inaccessibility of the data to the public. Australia's primary national environmental reporting system—the State of the Environment Report—also uses this incomplete data to measure and explain the impact of deforestation on our environment.

NGGI data does not measure a broader range of environmental values and current methods imply that loss of canopy cover has little to no impact on carbon emissions, however this is a loss of carbon into the atmosphere and habitat for threatened species.

To maintain pace and credibility with international agreements and access to biodiversity and climate friendly markets, we recommend that the federal government implement a national deforestation and ecological restoration monitoring program based on the latest remote sensing technology that includes regular, detailed data made publicly available, and including raw GIS data, interactive maps and detailed breakdowns of vegetation extent, condition and loss by land use. Such an assessment should follow the robustness of Queensland's Statewide Landcover and Trees Study (SLATS).

We also recommend that the federal government commission an independent national assessment of the condition of Australia's native vegetation, rivers and wetlands, coasts and oceans every ten years, and as a sequel to the 2000 National Land and Water Resources Audit.

International commitments & access to markets

Having signed on to various international declarations and agreements, Australia is in the position to be a global leader on biodiversity protection and climate action to reduce greenhouse gas emissions.

As a signatory to the Glasgow Declaration on Forests to halt and reverse forest loss and land degradation by 2030, it is incumbent on the Australian government to accelerate legislation, regulations and funding programs to “conserve forests and other terrestrial ecosystems and accelerate their restoration”⁵ for nature and the climate.

With the recently introduced European Union Deforestation Regulation, the Australian government has the opportunity to work with the land sector and key supply chain actors to develop genuine traceability methods that screen deforestation and therefore, mitigate climate and biodiversity risk in supply chains. In so doing, it can ensure Australian companies become best placed globally to service high-value markets like the EU. If left unchecked, market access for Australian companies will become increasingly compromised by deforestation, climate and biodiversity risk due to poor and high-carbon emitting land practices.

⁵ Glasgow Leaders' Declaration on Forests and Land Use:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20230418175226/https://ukcop26.org/glasgow-leaders-declaration-on-forests-and-land-use/>



Corporate action: no net zero without zero-deforestation

The corporate sector also holds significant social and financial responsibilities in proactively ensuring Australia meets emissions targets. Banks, retailers and investors all play a role in promoting sustainable practices and supporting the transition to net zero and as key economic stakeholders should be held accountable to the country's land sector emissions targets.

The discussion paper provides a summary of current industry net zero climate commitments in the land and agriculture sectors in Australia. However, none of these commitments include zero-deforestation. This seriously jeopardises their integrity, given the growing consensus that organisations cannot hope to reach their net zero goals without tackling deforestation.

For instance, the global Race to Zero campaign, which aims to build momentum around the shift to decarbonisation, recognises that organisations must pledge to halt deforestation and protect biodiversity as part of any meaningful climate commitments.

The Glasgow Financial Alliance for Net Zero clearly states that “the world is unlikely to reach net zero by 2050 unless we halt and reverse deforestation within a decade” and that “transition plans that lack objectives and clear targets to eliminate and reverse deforestation are incomplete”.

Global Canopy's Forest 500, which tracks the policies of 500 companies and financial institutions linked to deforestation, states that “there is no net zero without ending deforestation and conversion”.

The Science-Based Targets Initiative (SBTi), that aims to enable companies and financial institutions to set emissions reductions targets in line with climate science, is also increasingly focusing on deforestation. It now requires companies in the Forest, Land and Agriculture (FLAG) sector to commit to no-deforestation as part of their net zero plans in order to have their targets validated by the initiative.

The Agriculture and Land sectoral plan should align with these credible global initiatives. The elimination of deforestation must be central to the plan's objectives, in line with climate science.

Building resilience into the landscape

Australia's forests and bushland play an important role in capturing carbon from the atmosphere and storing it. Deforestation and degradation of these landscapes contributes to climate change due to the carbon emissions released into the atmosphere.

Protecting Australia's forests and bushlands from deforestation and land clearing not only contributes to limiting carbon emissions but builds resilience into the landscape by:

- Providing shade for livestock and a cooling effect on the land's surface,
- Boosting water infiltration and groundwater recharge,
- Moderating large run-off events and decreasing streamflow and surface runoff during rain periods which can reduce the risk of floods,
- Limiting the number of dry and hot days, risk of intense fires, and drought during El Nino years; and

- By providing crucial habitat for more than 80% of Australia's land-based native species.

Ending native forest logging will reduce fire severity risks and build ecological resilience. Logging removes habitat and feed trees, reduces structural complexity, kills native wildlife and den/nest trees and also causes erosion therefore stopping forested landscapes from storing carbon.

Native forest logging has been shown to increase the frequency and severity at which forests burn. In general, industrial logging leaves approximately one half of a tree on the forest floor. This coarse woody debris may then decompose, release carbon into the atmosphere, and fuel fires. This increases forest carbon emissions. For example, native forest logging is the highest emitting industry in Tasmania, with annual emissions equivalent to 1.1 million cars.

Building on existing efforts and knowledge

The federal government must build on existing effort and knowledge to phase out land carbon emissions caused by deforestation (land clearing and logging), this can be achieved by:

- **Legislating sectoral targets of zero deforestation (land clearing and logging) of HCV forests and bushlands;**
- **Separating land sector emissions reduction targets from non-land sectors in national climate accounts;**
- **Regularly reporting on both deforestation and afforestation targets to allow for greater transparency and tracking of progress. There must be full and transparent disaggregation of data with the LULUCF sector reporting;**
- **Funding and resourcing the development and implementation of a national vegetation and emissions monitoring method and product which build on best practice currently used in Queensland and New South Wales Statewide Landcover and Trees Studies (SLATS);**
- **Funding and resource biodiversity conservation targets (such as 30 x 30) to understand protecting Australia's HCV forests and bushlands as a means of climate mitigation and adaptation;**
- **Ensuring there are strong and well-enforced national environment laws that are applied to land carbon emitting sectors, particularly agriculture and other sectors tied to extensive land clearing, and native forest logging;**
- **Developing high integrity financial incentives to encourage landholders to retain HCV vegetation and improve biodiversity;**
- **Supporting sector-wide agreements and sector-wide implementation plans to implement commitments. This includes the development of monitoring, traceability, reporting and verification systems for relevant supply chains and production systems;**
- **Taking steps to eliminate greenwashing. Sustainability claims without evidence or action are increasingly contentious and, in their own right, can create risk. Sustainability claims must be genuine and backed by due diligence, effective timelines, and demonstrable actions⁶;**
- **Cohesively integrating existing efforts and new initiatives regarding nature-based solutions with broader sectoral plans and climate policies;**

⁶ We note our related recommendations to the Senate Standing Committee on Environment and Communications Inquiry into greenwashing are included here at Appendix 1.

- **Supporting food system transformations and high-integrity incentives for emissions reductions in agriculture;**
- **Fostering collaboration with First Nations people and land managers; and**
- **Developing robust finance strategies that mandate corporate disclosures on both climate and nature impacts, particularly on deforestation.**

Opportunities to meaningfully engage communities

It is important to recognise the critical role of smallholders, rural communities and First Nations peoples in decarbonising the agricultural and land sector.

In order to achieve long term, durable outcomes for nature and communities, the Wilderness Society is driven to secure genuine community rights in environmental decision making. Community rights in environmental decision making encompasses three fundamental universal rights that ensure meaningful community involvement. This includes:

- **The right to access accurate and useful information** held by authorities, enabling individuals to understand decision impacts and identify beneficiaries;
- **The right to participate**, guaranteeing communities ample time and inclusive opportunities to engage in decision-making processes, with consideration given to community input;
- **The right to challenge**, providing individuals and communities with legal recourse to review or challenge decisions that have been made unlawfully, erroneously, or unfairly in environmental matters.⁷
- **Cultural and self-determination rights of First Nations**, including to give or withhold their free, prior and informed consent.


Greater support for programs that facilitate the end to deforestation at the community level is crucial. This may involve the implementation of new funding mechanisms and capacity building initiatives tailored to local governments and regional entities. Enabling them to champion and effectively implement sustainable solutions for grassroots engagement is paramount. Through incentive programs and education, the government can promote precision agriculture, nature restoration and feed management, therefore reducing emissions and damage to wildlife. These initiatives empower local communities and contribute to economic and environment benefits.

Information and solutions need to be easily accessible, and the government should leverage local organisations for outreach including NRM groups and Landcare. There should also be a greater whole of government coordination of reporting requirements to improve enforcement and ensure compliance while reducing the compliance burden for producers.

Additionally, acknowledging and supporting the unique role of First Nations peoples in land stewardship is vital, and must include resourcing based on in-depth community consultation. First Nations people have unique consent-based rights that should be recognised in Australian law and practice, as set out by the internationally recognised United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).⁸ The recognition of First Nations' rights, including Free, Prior, and

⁷ Wilderness Society (2022), Who holds the power? Community rights in environmental decision-making Retrieved from <https://www.wilderness.org.au/images/resources/WhoHoldsThePowerReport.pdf>

⁸ United Nations Department of Economic and Social Affairs. (2007, October 2). United Nations Declaration on the Rights of Indigenous Peoples (A/RES/61/295). <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-ri>



Informed Consent (FPIC), should also be prioritised in decision-making processes that impact First Nations communities and throughout Australia's decarbonisation.

Developing emissions pathways

Agriculture as a sector has the potential to be a carbon sink through facilitating uptake of climate-smart management practices. This must include protections for Australia's HCV forests and bushlands. And, agriculture could profit from high integrity carbon farming practices with co-benefits of improving productivity, improving biodiversity outcomes, diversifying income streams and increasing resilience.

Supporting and enabling change

Improved extension and accessibility of information is key to increased uptake of more sustainable agriculture practices and ultimately reducing deforestation. Producers require financial and capacity support to implement climate-smart practices, while governments need to recognise deforestation as a major concern in Australia and step up to the challenge of halting and reversing it in order to support Australian landholders to access new and improved markets that require higher levels of due diligence surrounding nature and climate impact.

The Australian Government, along with agricultural peak bodies, have a responsibility to raise awareness of producers of the global and domestic processes that will increase their requirements to collect relevant data on emissions and management practices. Models need to be considered where the burden of compliance for reporting doesn't solely sit with producers but is shared with other supply chain actors.

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