




13 December 2023

  
Department of Agriculture, Fisheries  
and Forestry

Submitted online at: [Agriculture and Land Sectoral Plan | Have Your Say - Agriculture, Fisheries and Forestry](#)

Dear 

### Submission: Agriculture, Land and Emissions Discussion Paper

 welcomes the opportunity to provide a submission to the Discussion Paper *Agriculture, Land and Emissions (Paper)*.

#### About


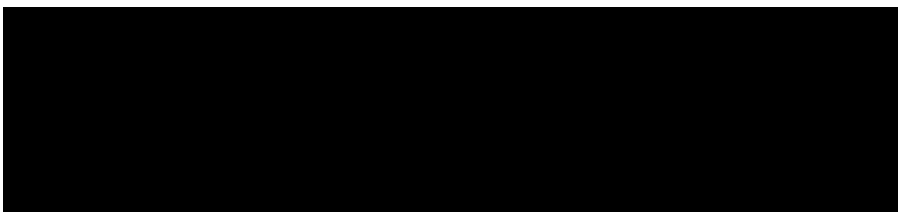






#### Key recommendations

The Paper's primary focus, quite reasonably, is on the management of greenhouse gas emissions by the agriculture and land sector. Land use, land use change and forestry (LULUCF) also offer significant opportunities to contribute more broadly to Australia's emissions' abatement through the storage of carbon.



Section 3.4 of the Paper covers carbon storage in land. It highlights three key points, that:

- LULUCF is now a net sink for Australia;
- over half of Australia's land is managed by the agriculture sector; and
- 57% of the land sits within the Indigenous Estate.

These factors mean that carefully established frameworks for LULUCF-based carbon storage could improve the nation's ability to manage climate change while enhancing the land management objectives of indigenous and agricultural landholders.

██████████ has previously examined the potential to store carbon by planting endemic native forests on land not suitable for agriculture, including land adjacent to or within farm boundaries. Such forests also would encourage improved biodiversity, assist with local land care to maintain agricultural productivity, and so in-principle be able to provide environmental offsets of power developments necessary for the energy transformation. ██████████ therefore encourages the Commonwealth to work closely with the wide range of stakeholders to develop a rigorous framework for LULUCF-based carbon storage that is aligned to the interests of indigenous landholders and farmers. This framework should be developed to enable developers of new native forests to bundle their carbon storage services with nature repair services focussed on biodiversity and land care.

██████████ notes that the Independent Review of Australian Carbon Credit Units (**Review**) recommended that the Clean Energy Regulator (**CER**) "develop procedures to support transparency of different project characteristics and types of co-benefits associated with ACCUs [Australian Carbon Credit Units]". In its response to the Review, the Commonwealth Government announced that as the nature repair market "develops, consideration will be given to linking carbon and nature benefits in the CER's registries". Similarly, the Climate Change Authority's April 2023 paper *Reduce, Remove and Store* noted that, in addition to carbon benefits, biological "sequestration can improve soil health, increase biodiversity, and provide other ecosystem services ...". The National Stewardship Trading Platform and its Carbon + Biodiversity Pilot ([Carbon + Biodiversity Pilot | National Stewardship Trading Platform \(agsteward.com.au\)](https://agsteward.com.au)) is exploring this potential with participating projects eligible to receive carbon credits for the carbon dioxide they store and cash payments for biodiversity improvements they deliver.

In the past, there has been opposition to bundling on the grounds that a forest should provide only one of these services, with each offset need being met by additional plantings. However, bundling of native forest carbon storage with the nature repair market will boost the economic viability of reforestation projects, and ██████████ suggests it is better to have one new native forest than none.

██████████ is aware of suggestions that fossil fuelled power generators should not have access to LULUCF-based carbon storage. It is widely recognised that using natural gas to generate electricity is essential to Australia's transition to an 82% renewably generated electricity supply. ██████████ therefore contends that natural gas-fired generators should be able to offset their emissions, including through investments in LULUCF-based carbon storage. This approach is consistent with and will promote the nation's rapid transition to net zero emissions by 2050.

██████████ Initially including wind and solar plant, the ██████████ medium to longer term plans include the production of green hydrogen. This hydrogen can not only fuel electricity generation; it also could support the manufacture of green ammonia to make nitrogen fertiliser that assists reduction of

Australia's farming emissions. Appropriate policy settings, such as the Guarantee of Origin scheme, will support the development of this industry and contribute to Australia's continued success as an exporter of agriculture produce and animal products.

## Conclusions

If you would like to discuss this submission, please contact [REDACTED]  
[REDACTED]

Yours sincerely

1. *Journal of the American Medical Association*, 2000; 283: 2689-2695.

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