

To whom it may concern.

With caveats this is how I see the outcome of the data as presented to me so far.

Very happy to be wrong.

I am a farmer having bought my farm from firstly shearing then as a farmer shearer and later as a farmer, then leasing my farm to my adult children once I became a [REDACTED] and a few injuries.

My farm is of moderate size (850 ha) with most of the land suited to grazing only.

I have been on [REDACTED] both surface and groundwater for over 20 years including years as chair of the [REDACTED] that led to a 20% reduction in one subzone due to declining groundwater levels

I note you have altered the order of consultation moving Agriculture from 5th place to first with no reasoning as to why in the Net Zero process.

I wish to raise multiple concerns at the process and the anti farmer dialogue I have followed here in Victoria over the last year.

I have been a part of many interactive meetings where selected farmers have done business models on converting farms to net zero. None appeared to achieve that and over the course of a few meetings they appeared to go from gung ho to really worried about how they could achieve net zero or pay the difference.

There is also a mistrust of Govt with these schemes . I did a lot of revegetation through fencing off remnants 20 odd years ago and some direct seeding of natives for just over \$1 per metre for the fence which meant we paid most of the cost . Replacement cost is \$10 metre These agreements were for 10 years and the trees were ours. Govt changed the rules after 10 years with no ongoing funding for my 14 individual lots of endangered buloke as they changed the funding to only over 4ha remnants. and stole the trees by legislation the same as they did in 1988 and I guess the land they were planted on.

My concerns are.

1.

There is no data out there readily available to input this process unless like me you have been following the processes.

2.

No-one is discussing the implications for the effects on water balance from planting vegetation or to increasing soil carbon.

3.

No studies are available on the effects of taking viable farmland out of production and it's effects on local communities and the worlds food supply.

4

There is no reward for farms that have already undergone re-vegetation or increasing soil carbon and will be a premium under any scheme for rundown farms with no tree cover.

5

Australia has already more than halved it's sheep flock since 1974 when I started farming

6

Change of ownership by sale or lease and capturing the carbon lost or gained by normal farming practises and how do we allow for bushfires both their prevention and firefighting.

1 A whole host of people are advocating taxing enteric emissions but not looking at the consequences. I was alarmed to hear the statements from the Dept Ag staff on their on-line discussions and how the chance to question them and their figures was removed. I felt guilty for being a farmer with sheep helping to feed and clothe the world . One statement was one farmer running 20,000 sheep had similar emissions to a small town. That town has to be clothed and fed and maybe they could just reduce the size of the houses, families, immigration and lifestyle.

2

You cannot alter the carbon balance without altering the water balance this is well documented in a study undertaken in 2009 by CSIRO.

(A Review of Plantations as a water intercepting land use in South Australia)CSIRO work done in SA.

I have brought this up many times at many meetings and the response is the same ,the presenters go dead quiet. Why isn't this study front and centre and after 3 decades in aquaculture using runoff water it is real.

This has been observed on many farms including my own where I have a patch of regen from 1983 where there has been no runoff since it regenerated with redgums in the wet 1983 following the 1982 drought. As a community we have a few examples of tree/carbon plantings in our area.

Two very recent ones would be intercepting both surface water runoff and recharge to aquifers.

(a)

In the early 1990's following some very wet years the parilla aquifer in some localised area was causing some rising salt issues around [REDACTED]

Our local landcare groups in conjunction with [REDACTED] planted a lot of drainage lines and around these lakes with a mix of natives mainly river red gum .

The growth rates have been phenomenal mostly because they are intercepting both groundwater and surface water inflows to the drains.

A model based on the CSIRO document shows a 20% interception of flows into [REDACTED] and I would guess a lot higher for [REDACTED]. (Non peer reviewed). [REDACTED] generates \$2.3 million a year to the local economy. (Source a Business case that I have)

Until lately it has really suffered from lack of inflows and if you add what has been lost to Native vegetation it could well be full and would not have been dry as often as it was.

It also takes a lot of water to raise soil carbon levels as it holds more water and consequently less runoff and recharge.

The effect on recharge to our aquifers from tree planting is also well documented and widely discussed and considered in water balance modelling in committees I have been on both where plantations directly draw from the aquifer or intercept recharge. There are many documents done by Sinclair Knights Mertz that I have that show that rate of interception by native vegetation.

(b)

We have already seen the effects of Managed Investment Schemes tree planting here in our [REDACTED] [REDACTED] with a huge part of the communities gone in the [REDACTED] [REDACTED] areas with the flow on effects to the [REDACTED] towns, schools businesses, sporting clubs etc. Houses sheds, windmills and families all gone to an industry that was unprofitable for our area due to distance from port and timber mills oversupply and other logistics not to mention the road damage during harvest. Not many plantings have gone back to the second rotation instead being converted back at great expense to grazing which are now beginning to support our communities abattoirs, livestock agents, livestock carriers merchandise and agronomy providers.

SA recognises the effects of plantations on aquifers by requiring them to have a water license.

3

At a local level on the cost of removing ruminants of grazing country.

On my farm there are no viable alternatives to grazing on large areas of our farm as cropping is not viable on some wet shallow soils and on some sandy country with non wetting sand and no suitable clay available.

For me on the information I have seen with the usual caveats of I don't think the research has been peer reviewed yet. I would have to sell half my sheep and plant that half of my farm being 425 HA to trees at \$2,000/ha?? In order to be able to offset the other half of our sheep's emissions.

Meanwhile I will lose most of my runoff for my aquaculture business and the groundwater recharge on the sandier soils.

4

It appears impossible to achieve net zero on my or similar grazing farms without huge changes to the way it is modelled. Firstly there has to be recognition of a base level of stored carbon that we are all allowed and get credits for.

The inclusion of the additionality clause has to be removed to allow farmers with good levels of tree cover and good soil carbon levels to be rewarded not penalised.

At present similar to the introduction of bans on tree clearing in our state in 1988 there is a penalty to farmers who have done the right thing as it appears economically and physically impossible to raise the sequestered carbon levels much above what some farmers already have.

The ridiculous part will be farms with run down carbon stores will be worth more than a farm with good carbon levels similar to fully cleared farms are worth more than my well vegetated farm because trees are not in the way of normal modern farming practices like GPS guidance and the carbon already present in the soils and trees will not be counted as an offset.

That is because it is easier to restore carbon soil and plant levels if there is very little in the first place. Historically cropping paddocks will be lower in soil carbon than pasture paddocks , higher again for perennial pastures.

Essentially on the data modelling I have seen for sheep it takes half your farm to provide the offsets and you lose half your income, half your farm and you will have less runoff and less recharge to boot and you have the cost of establishing the trees at approx. \$2,000/ha??

The whole thing stinks and is unworkable, inequitable and will decimate our area with it's large areas of grazing country and numbers of lakes and wetlands.

5

Already Australia has reduced its sheep flock from 120 million in the 1920's when my grandfather farmed and from a peak of 180 million in 1970 down to under 150 million when I first started farming sheep in 1974 down to 78 million this year. We have less than half the sheep numbers we used to have in the peak and they will reduce further this year with el nino and poor prices= as an industry we have already halved our emissions from sheep.

Doing the modelling there appears very marginal difference between sheep and cattle emissions on a kgCO₂e/kg LWT basis once you count all the emissions associated with wool. Why is this not widely discussed?

(Source Victorian Dept Ag Feb 8 2023 online meetings)

Enteric methane is not new methane like fossil fuel extraction and use which is new methane, Science says enteric methane is mostly gone by 8 to 10 years and is just recycling much the same if numbers don't increase. Based on enteric emissions alone as farmers we have reduced emissions by 60% since 1970.

My farm has more native veg and higher soil carbon levels than when I bought it starting from 1974 gradually adding small bits .I see no avenue to get rewarded for any of that just a no alternative to reducing sheep numbers and planting trees at great expense with no markets for plantation timber this far from mills and export facilities and very low carbon sequestration from most natives. The other risk for natives are the native flora and fauna that becomes part of the plantation if you want to clear fell it (Koalas gliders etc) and how do you carbon count through fluctuating el nino/la nina. In my time we have fluctuated between 2006 where there was hardly enough leaves on trees to hide a bird nest to now where you can't see through the tree foliage.

6.

As a farmer going through a generational change with leasing etc how do you lease or sell a farm under a carbon counting scheme?

I see it will take at great expense to be done independently, very subjective and a very random outcome based on the seasons to carbon count a farm changeover. Who pays if a leaseholder reduces your carbon offsets by drought or poor management or visa versa?

As CFA members it is rarely safe to go into plantations or Native scrubland except to follow a bulldozer. On bad days aircraft are unavailable if there are multi fires or to windy. It is a lot different to fight a grassland fire to a forest fire. And how is the carbon accounted. I remember the farmers at Horsham on Black Saturday saying they even lost the organic matter in the top inch or so of soil. Who pays? Who will man the firetrucks and maintain the firebreaks?.

I would like to be part of any processes that discuss this.

On a board I was on until recently the CEO said your area if anywhere will have not many issues .

It is the exact reverse of that statement because we already have a lot of NV and high organic carbon levels on grazing country.

[REDACTED]

[REDACTED]