



Enq: Kellie Todman
Direct Line: +61 8 9237 9694
Email: kellie.todman@cbh.com.au
Our Ref: 1706442066-14106

Co-operative Bulk Handling Ltd
ABN 29 256 604 947
Level 6, 240 St Georges Terrace
Perth WA 6000 Australia
GPO Box L886
Perth WA 6842 Australia
Telephone
+61 8 9327 9600
Grower Service Centre
1800 199 083
cbh.com.au

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Department of Agriculture, Fisheries and Forestry
[REDACTED]
GPO Box 858
CANBERRA ACT 2601

Submitted online via: [Have Your Say website](#)

Agriculture and Land Sectoral Plan

On behalf of Co-operative Bulk Handling Ltd (**CBH**) I welcome the opportunity to provide feedback on how the Agriculture and Land Sectoral Plan can be developed to support the industry to transition to low-carbon future.

Background

CBH is Australia's largest co-operative and is owned and controlled by around 3,500 Western Australian grain growers. As a co-operative, CBH's core purpose is to create and return value to WA growers, both current and future.

The WA grains industry is the largest agricultural sector in WA and the fourth largest export industry overall, with CBH's grain grower members producing an average of around 17 million tonnes per annum – about 40 – 50 per cent of the entire Australian grain production and contributing approximately \$6 billion to the WA economy and regional communities every year.

CBH – as the bulk handler and supply chain operator for the vast majority of the WA grain industry - operates a large and complex grain supply chain in regional WA comprising road, rail and port infrastructure with approximately 120 upcountry receival points.

In addition, CBH's Marketing and Trading arm is Australia's largest exporter of grain, with a market share of approximately 30 per cent of aggregated bulk Australian grain exports, exporting to around 200 customers in 30 countries around the world.

Carbon Measurement

Understanding the emissions intensity of grain crops will become increasingly important to support trade and market access. Currently there are multiple on-farm carbon emission calculators available that use different methodologies and emissions factors, resulting in inconsistent results for Australian cropping enterprises. The absence of an industry-standard carbon calculation methodology and emission factors, which cater for the diversity of geography and farm practices of Australian cropping enterprises, impedes comparability and trust among growers and customers.

CBH's preference is that the Agriculture and Land Sectoral Plan ensures there is the development and promotion of a single calculation methodology and emission factors for Australian cropping

systems, accepted by and available to all calculator providers, farm consultants and growers. Sufficient ongoing investment in these methodologies, emission factors and data tools should be made so changes in technology and on-farm practices over time can be captured, and benefits realised by growers. Lastly, CBH's most recent grower survey indicates that very few growers are currently measuring their emissions. Growers should be incentivised to measure their emission profile as this understanding is critical to the adoption of technology and practices that reduce emissions.

Land Use Change

The Agriculture and Land Sectoral Plan should aim to strike a balance between land use change initiatives and safeguarding the value of established agricultural industries, particularly cropping. Specifically, the reforestation methodology under the Emissions Reduction Fund to create Australian Carbon Credit Units and the potential for the establishment of the nature repair market pose direct competition to existing land uses. While reducing carbon is essential, production of grain and other agricultural commodities delivers positive externalities, including significant economic contributions, support for regional communities and local and global food security.

Grower Competitiveness

Australian growers, particularly in Western Australia, compete globally against other exporting jurisdictions. Any proposed initiatives for emissions reduction should not add excessive production costs that could hinder competitiveness in export markets. The sectoral plan must aim to not only minimise additional costs associated with sustainability measures, but encourage and support opportunities for expansion into new markets, with the potential for price premiums available to growers who adopt sustainable farm practices.

Research and Development Investment

Initiatives focusing on short-term opportunities like coated fertilisers, biofuels, and improved farm practices must complement research into long-term, transformative technologies such as green ammonia-based fertilisers, electric farm equipment, and seed genetics.

Capacity Building

Industry acceptance will be critical to ensure initiatives to reduce emissions are successful. Efforts should concentrate on empowering trusted advisors and industry bodies and groups who can disseminate accurate and valuable information. Supporting extension programs like the Carbon Farming Outreach Program is vital to enhancing knowledge dissemination and facilitating the adoption of sustainable practices among growers.

The opportunity to make a submission is greatly appreciated and we encourage you to contact our Manager – Government and Industry Relations, Kellie Todman, on 08 9237 9694 or kellie.todman@cbh.com.au if you require any further information.

Yours sincerely,

For: Co-operative Bulk Handling Limited



Ms Brianna Peake

CHIEF STAKEHOLDER RELATIONS, SUSTAINABILITY AND STRATEGY OFFICER