

13 December 2023

████████████████████
Department of Agriculture, Fisheries, and Forestry
GPO Box 858
Canberra ACT 2601

By online upload

To whom it may concern:

RE: Agriculture and Land Sectoral Plan

On behalf of the NFF Horticulture Council (the Council) and the wider national horticulture industry, I thank staff at the Department of Agriculture, Fisheries and Forestry (the Department) and particularly those in the Climate Policy Branch for this opportunity to make a submission as part of the consultation process in developing the Agriculture and Land Sectoral Plan (the Plan).

Horticulture is Australia's third largest agricultural industry. It includes fruit, vegetables, nuts, flowers, turf, and nursery products and generates close to \$18 billion in value at the farmgate to the economy each year. No other industry is arguably able to transform energy, water and land into regional jobs and wealth at the same scale and as efficiently as horticulture.

The Council is the preeminent forum for forming policy and advocating on behalf of our national horticulture industry. It was established in 2017 and now comprises 21 national commodity and state peak horticulture bodies, who together represent the full breadth of an incredibly diverse industry.

The Council develops policy positions on common issues of national importance to the horticulture sector such as trade, workforce, biosecurity, farm business, markets and competition, R&D, telecommunications and infrastructure.

As you might expect, a core priority for the Council is ensuring we have a set of strong and effective policies and programs in place to ensure we are minimising our emissions to the fullest extent possible, to support our growers adapt to a changing climate, and to protect our environment assets, upon which our industries and shared prosperity are built.

With regard emissions reduction ambitions, the Council is aligned with the National Farmers Federation in supporting an economy-wide aspiration of net-zero emissions by 2050, provided that no sector specific targets are imposed. This position is informed by an appreciation that emissions from the agriculture sector are hard to abate and that recent research by the Department of Climate Change,

Energy, the Environment and Water forecasts that agriculture cannot reach net-zero by 2050¹.

An early observation worth noting, in the context of emissions reduction opportunities, is the significant difference in production systems, markets and industry organisation between horticulture and the rest of the Australian agriculture sector, and then the significant diversity in the same ways between horticultural commodities. For example, the emissions reduction opportunities for perennial tree crops like apples or mangos are going to be quite distinct from those in the mushroom production, which are different again to those of the turf or nursery industries.

It is perhaps a result of the diversity and complexity of horticultural production systems and markets that arguably less is understood and known about the emission reduction opportunities of our sector relative to the rest of agriculture. The cursory treatment of horticulture in the *'Agriculture, land and emissions'* discussion paper points to this conclusion.

Some of the lower hanging opportunities for emissions reduction in horticulture are likely to be found in finding efficiencies in fuel and energy use. For example, those parts of the industry growing fresh produce rely on a cold chain, an uninterrupted sequence of refrigerated storage and transport solutions, to ensure their goods arrive in store in both a fresh and safe condition. This refrigeration and transport system requires significant energy inputs.

There are opportunities for carbon storage in the land for horticulture. Already common practice across annual vegetable and fruit production is returning unused organic material back into the soil and the rotational use of cover crops that are also ploughed back in. These practices however could be taken up more widely and improved with further research.

Again, these carbon storage opportunities will be distinct particularly from those found in broadacre cropping or livestock enterprises. Horticultural businesses typically have less land not being continually cultivated and able to be set aside for tree planting for the purpose of carbon capture. Where businesses have perennial tree crops, the carbon sequestered is currently not recognised as being additional to normal activity.

One of the simplest yet most impactful interventions in reducing emissions is avoiding wherever possible unnecessary production in the first place. In this way, opportunities for emissions reduction will be the same as those for food waste reduction. A final draft of the Horticulture Sector Action Plan, developed by Stop Food Waste Australia and aiming to reduce waste across the industry, identifies as a root cause a cycle of overproduction, fuelled by speculative growing and lack of market transparency.

Unlike other parts of the national agriculture industry, horticulture is primarily focused on servicing the domestic market. The horticulture industry would welcome as within scope of the Plan consideration of opportunities for improving

¹ <https://www.dcceew.gov.au/sites/default/files/documents/australias-emissions-projections-2023.pdf>

the efficiency and transparency of domestic markets for fresh produce as a means of avoiding unnecessary production and associated emissions.

Not unrelated to the operation of our domestic fresh produce markets, it is the profitability of horticultural business that is perhaps one of the greatest barriers for growers taking action to reduce emissions or build carbon stores. Successfully adapting to a changing climate and adopting new practices or technology requires time, money and the right mix of skills and lived experience.

To address these barriers and accelerate emissions reduction in agriculture and increase carbon storage in the land, there are a wide range of interventions available to the Federal Government. These interventions include, but are not limited to, the following:

- Financial support through grants or subsidies for horticulture businesses adopting environmentally friendly and low-emission practices, such as energy-efficient technologies or renewable energy installations.
- Introduce tax credits or accelerated depreciation for investments in emission reduction technologies, energy-efficient equipment.
- Allocate funds for research and development initiatives focused on innovative and sustainable practices in horticulture, including for establishing approved methods for carbon crediting.
- Support industry groups and other organisations deliver extension activities designed to increase the uptake of new technologies and practices that deliver business efficiency gains and emissions reductions.

The Council would welcome further engagement with the Department as the Plan is developed. Should the department wish to discuss any of the above further, please be in contact with [REDACTED].

Yours sincerely,

[REDACTED]

JOLYON BURNETT
Chair
NFF Horticulture Council

David Jochinke
President
National Farmers Federation
[REDACTED]