

13th December 2023



Department of Agriculture, Fisheries and Forestry

GPO Box 858
Canberra ACT 2601

TO WHOM IT MAY CONCERN

RE: TFGA Submission- Agriculture and Land Sectoral Discussion Paper

The Tasmanian Farmers and Graziers Association (TFGA) is the peak representative body for Tasmania's primary producers. Agriculture is key to the state's economy and TFGA is committed to ensuring the sector remains profitable and sustainable. As an island state, Tasmania's agricultural industry is heavily dependent on export and will be impacted by any changes to international markets due to emissions reduction legislation. While Tasmania is highly exposed to the impacts of climate change with this comes great opportunity to adapt and prosper into the future.

The Agriculture and Land Sectoral Plan Discussion Paper has been considered by TFGA's Agriculture Sustainability Committee who are well informed to offer guidance on industry matters pertaining to their area of expertise. We welcome the opportunity to contribute to the development of the Agriculture and Land Sectoral Plan.

Emissions reduction in agriculture is complex however the national agriculture sector continues to make significant voluntary led contributions to mitigate. Agriculture contributes uniquely to Australia's emissions profile through both sequestering carbon in soil and vegetation and producing emissions during livestock and crop production¹. Landholders, who are acutely aware of the importance of their role in reducing emissions, are actively engaged in adopting new technologies, setting industry emission reduction targets, and cultivating and sharing knowledge. Meeting ambitious goals to increase farmgate value, in addition to commitments to reduce emissions, will require collaboration across geographic distances and between sectors.

While both state and federal Government have released many plans and strategies aimed at mitigating climate change it can be unclear how these will all work together to achieve success. Key to the collective reduction of agricultural emissions is the need for the Government to continue to work collaboratively with farmers across the country. We believe that there are many pragmatic and practical ways for farmers to mitigate climate change without massive investment and interruption to production.

TFGA have structured our submission based on the five sections of the discussion paper.

¹ Reference: https://nff.org.au/wp-content/uploads/2023/06/22.11.24_Policy-Summary_NRM_Climate-Change-Policy.pdf

The need for higher ambition.

Farmers are responsible for managing 55% of Australia's land mass². With this responsibility comes extensive knowledge and experience in sustainable landscape management which should be included in the design of any emission reduction strategies. Addressing climate change, which is considered one of the biggest threats to productivity by farmers, should be based on a landscape scale approach that incorporates nature as a key enabler of reducing emissions. A strongly networked community of farmers, land managers and supporting organisations provide the perfect skillset to drive change.

Landholders are already adopting new and emerging methods to reduce their emissions including but not limited to feed supplements to reduce emissions from ruminant livestock, soil carbon projects, tree plantings, regenerative agriculture, and installation of renewable energy infrastructure. However, it is still important for the Government to consider that not all farmers are in the position to commit to such high levels of emission reduction in the prescribed timeframes.

Both vegetation and soil play a critical role in the overall carbon sequestering abilities of agricultural land. However, it is important that the Government does not become overly reliant on these sequestering methods to reduce emissions as they are also vulnerable to disturbance and eventual release of carbon.

A significant barrier to action is enforcing regulatory policy-based approaches to control emissions. The Government, while on the path to reducing emissions in the agriculture sector, must understand that different commodities and farmers will be at different stages of reducing their emissions. While maintaining flexibility and choice in how to reduce emissions it is also important to consider that slow adopters may potentially have a disproportionate impact on the overall sector's success in this space. Additionally, fluctuations in seasons and commodity prices affect farmers' ability to implement new strategies. Many farmers have already invested their own money into emissions reduction and the high upfront costs to invest in new technology is often a challenge.

Building on existing effort and knowledge.

Tasmania is home to many state-based initiatives that could be extended at a national level. Prominent examples include Asparagopsis, a seaweed derivative used as a feed supplement, to reduce methane emissions in ruminant livestock. Results have shown animals whose diet contains the Asparagopsis additive can have methane reductions of up to 90%³. Although there has been initial success there are significant cost issues surrounding the supplement. The cost of implementing the additive is currently a dollar per head each day⁴ which when used across large livestock numbers becomes a significant cost to farmers. There are also issues around the market for the additive as farmers remain cautious around costing and bureaucracy. The Government would benefit from investing to ensure this remains a viable option for farmers by addressing any cost and access issues.

² Reference: [https://www.agriculture.gov.au/abares/products/insights/snapshot-of-australian-agriculture#:~:text=Australian%20agriculture%20accounts%20for%3A,production%2C%20in%20December%202020\)%20and](https://www.agriculture.gov.au/abares/products/insights/snapshot-of-australian-agriculture#:~:text=Australian%20agriculture%20accounts%20for%3A,production%2C%20in%20December%202020)%20and)

³ Reference: <https://www.seaforest.com.au/how-asparagopsis-works>

⁴ Reference: <https://www.abc.net.au/news/2023-10-02/sam-elsom-feed-cows-seaweed-to-tackle-climate-change/102535734>

When considering existing efforts, it is critical that the Government considers farmers' past and current mitigation strategies. For farmers who have already undertaken a great amount of work in this space by implementing strategies such as reducing stock numbers and rotational grazing it would be detrimental if the Government were to inflict further regulations and requirements.

Opportunities to reduce emissions.

In the short term, farmers will benefit from initiatives and programs that provide practical advice on how to reduce emissions. The Government needs to develop a clear action plan which includes the recommended timing and order of different stages and activities in emissions reduction. Clear and easily accessible information on the range of options available to landholders is key to the successful uptake of any initiatives aiming to reduce emissions. For farmers, the best solutions are those that are easily accessible and not heavily regulated as this can cause additional administrative burdens.

In Tasmania specifically, focussing on the strong tradition of smaller, innovative farmers with long connections to their land is essential in driving the sector forward. The main priority should be to build the capacity of the agriculture and land sectors to understand, respond to, and capitalise on future change. Recognising and supporting the existing relationships between member organisations, such as TFGA, and farmers will empower decision making in the emissions reduction space. Tasmania has a tight-knit agricultural community who are capable of uniting to build capacity and drive change across the sector.

Developing emissions pathways.

The main areas of focus for agricultural emissions reduction include livestock, soils, energy, fertilizers, and trees. Improving energy and fertilizer efficiency, adapting livestock, and cropping practices and using soil and trees as carbon stores all present opportunities to reduce emissions across the agricultural sector.

In any attempts to reduce agricultural emissions the Government needs to continue strengthening their support and investment in technology and innovation while ensuring that any emerging technologies are affordable and accessible at the farm level. The Government needs to ensure there is sufficient support available for farmers in transitioning to more emission friendly technology. For those farmers who have already invested time and money into climate mitigation strategies this is an opportunity to lead their sector into the future. Industry led emission reduction methods that consider farmers in their design and implementation must be prioritised. Crucial to successful emission reduction across agriculture is the early involvement and consultation with landholders who can offer valuable input and guidance.

Supporting and enabling change.

To support and enable change, it is important to recognise the family and mixed-farming nature of agriculture sectors like Tasmania's. Without adequate support to respond to climate change and the associated impacts on the supply chain, this group will struggle to respond at pace. Emission



reporting and the broader area of natural capital accounting is a rapidly emerging field which has created confusion around different roles and responsibilities. There is concern throughout the agricultural industry around climate and nature related financial disclosures and what they may mean for farmers. In addition, farmers are facing changing consumer demand as people seek to know more about the environmental origins of what they are purchasing.

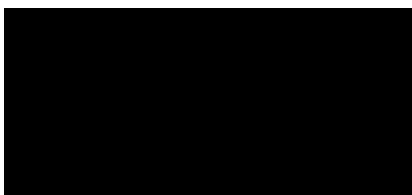
First and foremost, there needs to be recognition and consistency of what is being measured and how it will be measured using credible government agreed methodology as Australia lacks a sustainable framework for natural capital accounting. It is important to ensure the cost of this reporting is not solely placed on farmers but rather spread across the supply chain. Farmers are seeking a harmonisation of methodologies, reporting frameworks and schemes with a shared consensus that the Government should be focussing on renewable energy and electrification of vehicles, fuel alternatives and soil health and carbon sequestration as ways to reduce emissions.

Conclusion

TFGA understand that farmers and land managers have an important role to play in reducing emissions however we believe this would be best achieved through a collaborative nation-wide approach. Through building capacity and the ability to adapt to change, the agriculture sector will be well positioned to move forward into a sustainable and prosperous future.

We welcome further consultation. Please contact TFGA if you require further information.

Yours sincerely,



Alastair Cameron
TFGA Interim CEO