



**Victorian
Farmers
Federation**

SUBMISSION

Guideline for Managing Greenhouse Gas Emissions

22 February 2022

Our Position

The Victorian Farmers Federation is the peak body representing Victorian agriculture. VFF has been on the record regarding our concerns in relation to lack of regulatory knowledge and considerations in relation to agriculture and the GED and the appropriateness of the EPA in relation to human health.

Even though some aspects of the 1970 Act applied to agriculture – such as organic matter as industrial waste, agriculture was applying the circular economy approach to what we know is a key material for plant growth and soil health.

Will the guidelines meet the objective?

The purpose of the guideline is to contribute to state of knowledge by a risk management approach to help you better understand how to identify and assess (eg calculate) and manage your direct and indirect CHG emissions. We believe this is duplication of industry standards and national jurisdiction. Many aspects of agriculture and climate change adaptation is federally regulated. VFF is concerned that the state of knowledge guideline is silent on regulatory considerations, and proportionality to risk.

It seems the Guidelines is calling for farmers to look at their emissions (sources, baselines, calculators) and identify options for GHG reductions then as part of a General Environmental Duty. While this may be required in other areas, for agriculture it is best delivered under Australia's [Rural Research and Development Corporations](#) (RRDCs). VFF supports the work of the RRDCs and their contributions to state of knowledge and continual improvement and best practice that is achievable for many.

Assumptions that agriculture is unaware of climate change

Farmers have been managing the environment and adapting to change for centuries. The concept of climate change adaptation is not new to us. The sector has been investing in climate research long before the Climate Change Act or the new Environment Protection Act. Our Industry knowledge is embedded in industry standards. Farmers trust their sector specific knowledge to provide tools and approaches that consider other regulatory requirements.

Farmers should be free to implement industry climate mitigation programs without regulatory complication. By not understanding agriculture or the existing regulatory and national and international standards the EPA draft guideline compounds common myths regarding agriculture and climate change by not recognising state of knowledge and does not assist the industry in understanding the risks by not pointing new entrants to production system information.

Duplication and Confusion

At best the guidelines will create regulatory duplication and at worse will reduce the ability of industry to adapt.

Farmers pay levies to government regulated / constituted research bodies who undertake this research on their behalf. It is incorporated in industry practice which encourages best practice across many regulatory areas. There are many technical barriers around methane currently subject of R&D worldwide. An individual farmer is not best placed to understand the science or the risk. They pay levies to a research body to that they work to understand the nature of the risks, the potential solutions and how to make these practical.

VFF has raised RRDCs, their role and the state of knowledge they possess with EPA through the Agriculture Reference Group. The draft guidelines, by failing to acknowledge agriculture sector processes, will not lead to informed risk assessments or give confidence in the EPAs ability to understand the science or determine what is practicable.

An analogy in a different sector was the CERA model for emergencies. Councils were meant to ascertain risk against 20 types of emergencies, including earthquakes. No one on a Council emergency committee was able to ascertain the risk of earthquakes – but could respond to likely consequences if provided the risk mapping. The CERA model was changed to make this clear. The current guidelines are the equivalent to

council's attempting to map earthquakes. What the EPA draft guidelines should do is point producers to the information they need to manage their risks.

We believe that this document has been produced with end of pipe industries in mind. It does not reflect the cycles within agriculture or contribute to any recognition or knowledge of other issues that must be considered in determining reasonably practical.

Failure to understand State of Knowledge

In its current form it does not add to state of knowledge and could work against good practice and uptake of research that is fit for purpose. The agriculture sector has the runs on the board. It has RRDC's that are creating the state of knowledge with a detailed understanding of what can be implemented.

Our concerns are increased by regulatory actions undertaken in a way industry was assured would not happen and without the agriculture reference group to work through these issues. If broiler codes, EMPs and planning permits can be ignored in response to GED / health being applied on an odour issue for someone who moved into a buffer zone and was aware of this issue can we be confident that a similar approach will be taken to an agricultural practice that conforms with state of knowledge?

Often agriculture is often described as a main contributor to climate change. How is that assessed? Food and fibre production is essential for human health. Emissions from livestock has always existed, and research is leading to reduction. Fuels and chemicals are used in farming. There is research and development to reduce use of chemicals and increase productivity. Crops and soil sequester green house gases. Agriculture is two thirds of Victoria's land area and less than a fifth of its emissions.

Agriculture is different from many other industries and needs industry specific guidance. Victorian Agriculture is well managed and innovative. Agriculture is a fairly low risk emitter, especially on a farm-by-farm basis. Industry is promoting transformation as a sectorⁱ, and within production systems.

Overreach leading to perverse outcomes

International climate measurements occur at the national level. Having a general environmental duty at a state level, without clear consideration of national and international frameworks is not only confusing for industry but can lead to market distortion between states.

There is a lack of clarity as to the role of these guidelines and the negative impact they may create in relation to access to state and national/ international incentives and credit trading programs.

VFF seeks assurances that the application of the GED in Victoria will not impact on Victorian farmers' access to carbon and other credit programs run by the Commonwealth.

As agriculture is often the sole industry that can sequester historic emissions it would be a perverse outcome if farmers were blocked from accessing payments for sequestering historic emissions via a regulation is unclear in purpose and application. The farm sector has already 'paid' for other sector emissions and is seeking certainty that actions for community benefit will be at community cost.

What does agriculture need to ensure continued ability to deliver climate adaptation theory into on farm practice?

VFF believes that this guideline does not assist with implementing the adaptive capacity of government as expressed in the Primary Production Climate Change Adaptation Plan.ⁱⁱ

Agriculture needs government support for its processes that are embedding climate change adaptation in not only best practice but common action. Each commodity and production system has different considerations. Soils and climate can impact on practice. We believe we have made the need for such a guideline redundant as industry is constantly reviewing the risks and the science. The best strategy is one that is delivered. The worst is one that can't be delivered.

Individual farmers have many skills and attributes. Seeking them to attempt to do scientific research to ensure compliance is an overreach. Professional farmers have relationships with their RRDCs. They hire professional advice on their production system. They use industry best practice as a benchmark of their operations. Encouraging those relationships and approaches across all land managers by directing producers to their RRDC program will not only achieve better uptake of adaptation practice but will highlight to other sectors the co-ordinated and professional industry led processes in agriculture.

VFF calls for agriculture to be removed from these guidelines and an agriculture specific guideline be prepared in conjunction with industry groups, RRDC and federal regulators using the principles in 3.3ⁱⁱⁱ and the land use sections of the Regulation of Australian Agriculture report of the Productivity Commission, including fit for purpose regulation. ^{iv}

How can EPA better understand its role in meeting national adaptation standards in agriculture?

VFF is disappointed that the Agriculture Reference Group rarely met and was disbanded. VFF called for the establishment of the group as the EPA 'all industries' approach was not suited to agriculture. Rather than hold all other industry groups back in sessions to address assumptions based on existing regulatory conditions (licences) VFF was promised a way to address the unknown unknowns in agriculture.

VFF is surprised that this draft guideline was applied to agriculture without any attempt to discuss with Agriculture Reference Group members.

VFF seeks the urgent reconstitution of the Agriculture Reference Group as an expert guidance group to be involved in all new guidance and practice documents, including identifying areas where agriculture specific advice is requirement. Issues to be discussed could relation to:

- Risk level – agriculture needs healthy soil, air and water as key inputs
- Circular economy issues – how waste products can be key inputs
- The needs of, and actions within industry in relation to climate change adaptation — replacement, reduction, sequestration
- What is a 'reasonable cost' for farmers to meet their GED?
- What are the different production systems? How does this change risk and practicality?
- What role does different geologies and climates have -how does this change risk and practicality?

VFF recommends the creation of an Industry Review Board as an expert review group to discuss the appropriateness of compliance activities. This should include experts from EPA, Industry Bodies, agriculture RDCs and DAWE representatives.

This group needs to understand state of knowledge in the broad sense and the difference between best practice and regulation. This would need to include all regulatory aspects relating to agriculture, including sustainability, animal welfare, OH&S, chemical use and handling to be able to understand factors in being able to implement control methods and levels of practicability.

The Victorian Farmers Federation

Victoria's agricultural production accounts for over \$13 billion of Victoria's economy and over 25 per cent of the State's exports per annum. Victoria's farmers produce high quality food and fibre, produced to high standards of safety, with little taxpayer support, and to some of the strictest environmental and highest animal welfare controls in the world.

The Victorian Farmers Federation (VFF) protects and progresses farmers' interests and our vision is for a secure farming future for Victoria and for generations to come.

We have a proud history representing Victoria's farm businesses since 1979 – primarily family farms that produce the eggs, grain, fruit and vegetables, meat, and milk that help to feed Victoria's six million people, and global community.

The VFF consists of commodity groups: dairy, grains, horticulture, chicken meat, eggs, pigs and livestock – and expert committees representing; water, planning, environment and climate change, farming systems, farm business, transport and infrastructure and workforce and social infrastructure.

Endnotes

ⁱ [Indicative industry wide materials outside of RRDC research, calculators and programs, Transforming Australian Agriculture with Clean Energy](#)
https://www.cefc.com.au/media/402213/cefc_transform_aust_agriculture_w_clean_energy.pdf
 Climate Change NFF <https://nff.org.au/climate-change/>
https://nff.org.au/wp-content/uploads/2020/01/2017.03.08_Policy-Summary_NRM_Climate.pdf
 Australian Climate Roundtable <https://www.australianclimateroundtable.org.au/>
 Climate Change VFF <https://www.vff.org.au/policy/environment/climate-change/>
https://www.vff.org.au/wp-content/uploads/2021/09/PS210907lh_Climate-Change-Policy.pdf

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Priorities and Actions



Figure 9. Primary Production Climate Change Adaptation Action Plan: priorities and actions 2022–2026

ⁱⁱⁱ iii Recommendation 3.3

The Australian, state and territory governments should review the way they engage with landholders on environmental regulations, and make necessary changes so that landholders are assisted in understanding the environmental regulations that affect them, and the actions required under those regulations. This would be facilitated doing more to:
 recognise and recruit the efforts and expertise of landholders and community-based natural resource management organisations
 build the capability of, and landholders' trust in, the organisations that administer environmental regulations (including local governments).

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iv -for-purpose regulation

Land use regulations and policies affecting farm businesses can be improved by ensuring that they are fit for purpose. Fit-for-purpose regulation should be:

- *targeted* — the scope of the regulation (that is, who or what the regulation applies to) should be clear and appropriate for addressing the regulatory problem
- *evidence-based* — there should be an apparent and demonstrable connection between the content of the regulation and the regulatory objective
- *proportionate* — the burden imposed by the regulation on government agencies and the public should not be disproportionate to the regulatory outcome achieved.