



**Victorian
Farmers
Federation**

SUBMISSION

**Climate action:
Victoria's emissions reduction target for 2035**

5 June 2022

OUR POSITION

Thank you for the opportunity to present a position for agriculture in relation to a 2035 emissions reduction target for Victoria. VFF believes that in order to reach a target it is important to work with each sector to look at the opportunities and challenges facing the sector, supporting adaptation and mitigation through enabling implementation of research and development that requires a more transformational understanding.

What are the issues and challenges for agriculture?

Agriculture is one of the industries most exposed to the impacts of climate change and with relatively few easy lower carbon substitution options available to it. The emissions trend from agriculture depicted in the *Victorian Greenhouse Gas Emissions Report 2019*¹ has remained fairly constant despite significant investment into research and development. We want to ensure the Panel a relatively flat line on emissions should not be seen as a sector not acting. VFF believes this reflects: the relative difficulties to reduce emissions further without a level of transformative change; the failure to report on emission intensity of the production system; and the challenge of improvements in sequestration through on farm action being attributed elsewhere.

Despite these challenges agriculture continues to invest in research and development on how best to mitigate and adapt to climate change in each commodity, production system and physical system. What agriculture is going is not always well understood by decision makers. Practices that have been developed to also have wider biodiversity and welfare outcomes are perceived as 'industrial farming'. We understand the challenges stemming from the complex multi-agency, multi-issues that the IPCC recently highlighted. We believe existing regulations that do not facilitate the consideration of climate change adaptation or mitigation as a valid reason to be requiring an approval lead to maladaptation.

We request that the Panel holds regular industry meetings to identify issues that need modification of statutes in order to be able to adopt new technology or practice for climate outcomes.

We seek a better understanding of different emissions intensities of different projection systems – for example per kg protein.

Understanding the commitment of agriculture to research.

VFF supports the submission of Dairy Australia which demonstrates the action of one Rural Research & Development Corporation (RRDC) body. It highlights the significant work that these bodies are doing on climate. To meet a target in agriculture it is critical that this research is enabled. For instance, the planning scheme applies state-wide – however is generally focuses on built environment in relation to climate.

We request that the Panel recommend to DELWP that they acknowledge the key role RRDC research and development can play in assisting the reduction in emissions without impacts on food security in Australia and globally and seek to ensure the planning system enables a balanced decision-making process.

Social license and market expectation challenges for agriculture.

Despite the significant commitment to research and best practice within the sector the consumer and the market can often make assumptions about what is climate friendly or sustainable. There is a challenge to

demonstrate how a production system that some will call 'industrial' can deliver a better outcome for climate and other performance standards.

This leads to avoidable challenges from poorly informed community expectations and poorly targeted regulatory requirements. These are key issues which the Government has a major role in addressing.

We request the Panel recommend to Government that community education be undertaken in regard to what climate change adaptation and mitigation looks like in different production systems.

Factors in setting a target

Farmers are also very nervous of targets due to previous obligations being met by regulatory changes that impacted primarily on agriculture. Many believe that they bore the cost of all other industries meeting the national target. There is a nervousness that a blanket approach will be taken.

Many in the community see agriculture as being the main source of emissions. There is little understanding of the nature of these emissions where they are natural cycling, or the significant investment agriculture is making to scientific research to modify even a natural process, for instance food additives to reduce methane emissions in cattle.

This misunderstanding of agriculture is compounded by many of the 'on farm' actions to reduce the climate footprint not being attributed to the industry but to LULUCF. Although industry figures are stated to be 'net', the figure for agriculture does not include sequestering aspects of the production system which are reported under LULUCF totals. Decades of Landcare on farm is not reported on.

We seek a recommendation from the Panel that acknowledges that there is no single path forward for reduction of emissions from the agriculture sector and active engagement with industry is vital to ensure farmers are enabled to act.

Factors in contributing to a target

Setting a target is meaningless if it can't be achieved. For our members it is frustrating where they are seen as not acting where they know what they need to do but they are not able to implement changes.

We do understand the need for regulations. But we cannot take transformational action if climate change is not part of the decision-making process.

VFF seeks a regulatory framework that facilitates climate change adaptation and mitigation in agriculture.

Two examples in the planning system are controls that:

- require the use of a thermally inefficient construction material for shedding so that they are more appealing in the landscape;
- do not allow a total environmental consideration in regard to using minimum or no till practices required to reduce emissions from soil.

Ensuring the planning system truly embeds climate change

The *Planning and Environment Act* is primarily about balancing social, economic and environmental aspects. It establishes a framework to deliver the objectives of planning. VFF understands the need to have regulatory frameworks but also that these frameworks should at least allow the consideration of climate change mitigation in the decision framework.

There is an urgent need to review the Victoria Planning Provisions against whether they enable climate change adaptation and mitigation.

VFF hosted two professional development courses for Planners on climate change and agriculture and renewable energy and agriculture. We could be happy to discuss the learnings from these sessions with the Panel as they highlight the need for community and decision makers to have access to the science and research in order to make balanced decisions and for Government to make assurances that this research is trustworthy.

Should adaptation plans for agriculture better reflect industry knowledge

VFF is seeking the ability for industry to be supported to reduce emissions in a way that best suits the production system and its setting. It is often tempting to look at land through a single lens and for a single purpose rather than look how multiple outcomes can be delivered.

Transformation change requires consideration of how to achieve multiple benefits. Government policy seeking to protect the same piece of land for agriculture; renewable energy; plantation timber¹ is a sign of **lack of co-ordination and an issue in isolation approach that leads to maladaptation.**

The challenge is not just to say that is an area that suits by policy position but to really look at that area. To recognise the competing demands. To work out how you can maintain agriculture production, facilitate renewable energy and contribute to carbon storage in plantation timber. Although at face value this does not seem to be an issue relating to a target it does show the danger of positions, each purporting to be relating to climate change, being made in isolation of other actions or consequences. A poorly articulated or understood target can support maladaptation by creating lock-ins of vulnerability, exposure and risks that are difficult and expensive to change and exacerbate existing inequalities.

VFF recommends that the Panel look at how Government can model better decision-making processes that clearly articulates the multiple objectives to be delivered and proper consideration of social, economic and environmental outcomes and costs.

Commercial consent required for renewable energy?

The failure of AEMO or the state government to understand the impacts of transmission on agricultural productivity has created a social license change for adaptation. Agriculture already believes that they have unfairly born the cost of meeting previous targets. Seeing transmission projects that does not seek to understand the cost of that infrastructure to landholders is not fair.

We believe, that like the footprint of renewable energy generation, land used for transmission or other public use should be at commercial consent.

¹ DELWP documents on exhibition in February 2021 that made no reference to other positions or issues.

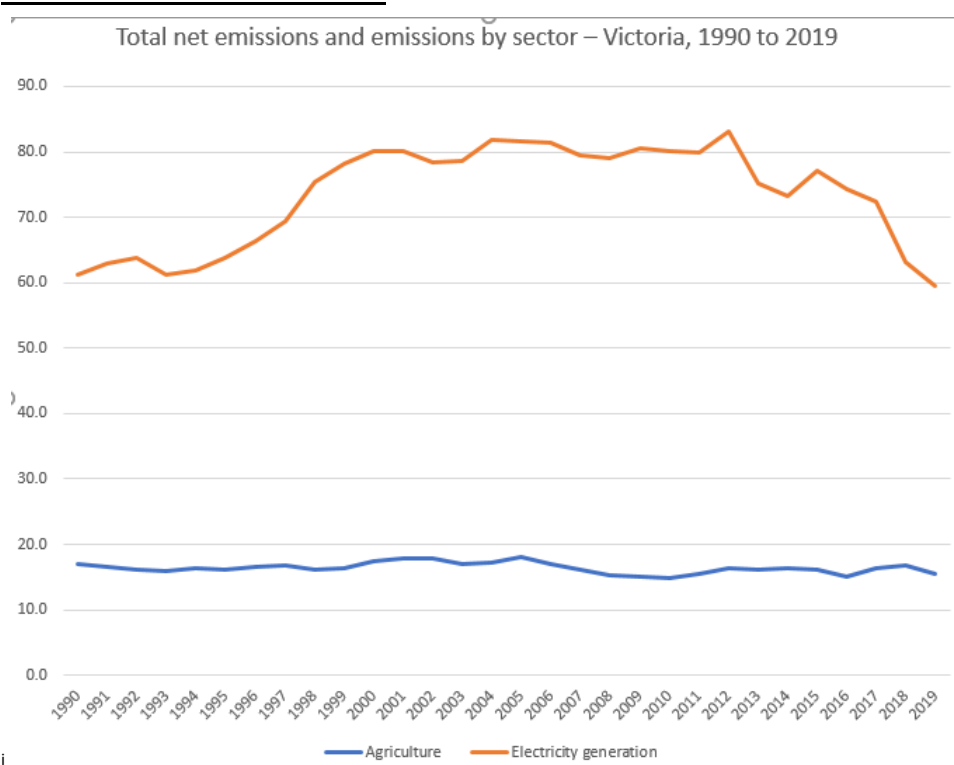
Challenging other sectors to invest in research?

The VFF is seeking a target that is fairly considered and focused. We are seeking other industries to follow agriculture and invest a percentage of their profits in research and development overseen by a regulatory process.

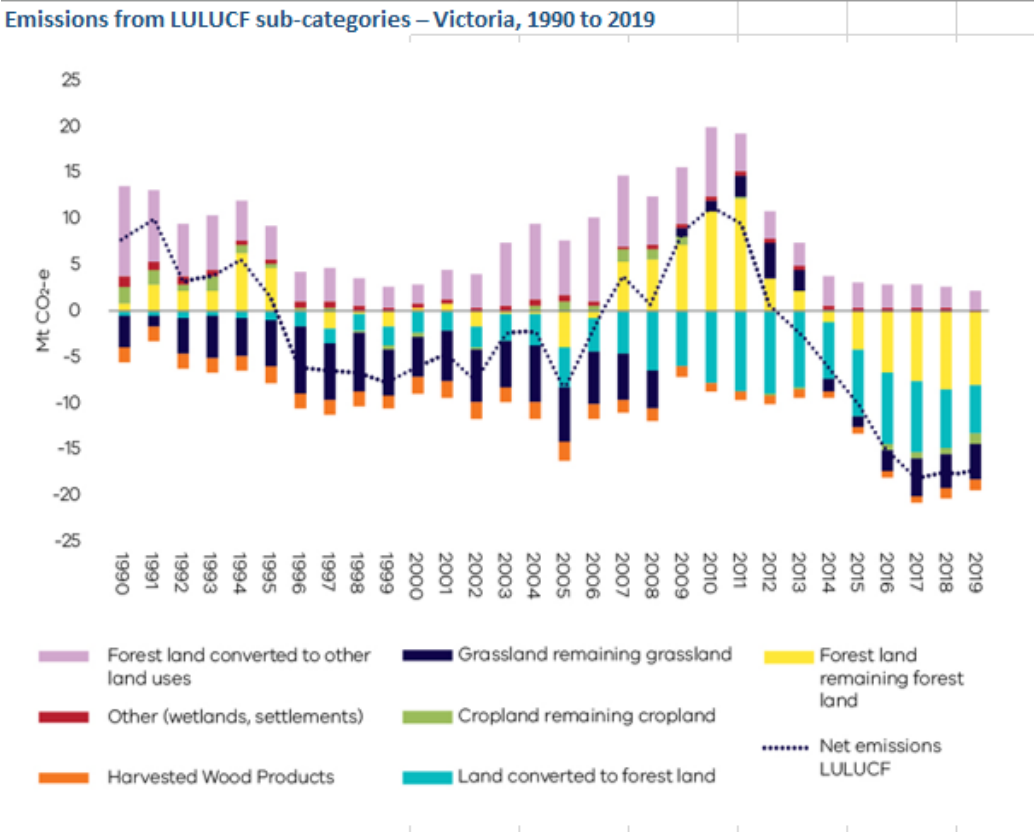
We are seeking assurances that the Victorian Government will see agriculture as a trusted partner. That it will respect the research being undertaken in relation to mitigation and adaptation in regulatory frameworks, programs to support implementation of changes, community education that celebrates the practices of agriculture and the role it is playing and ensuring that sector sequestration to address historic emissions is a commercial opportunity for the sector.

I have attached the VFFs positions in relation to Climate Change, Renewable Energy and Managing Entry to Farm to demonstrate that the Agriculture sector understands the need to transition in response to the challenges of climate change and has given clear thought to how this can be best achieved in relation to production of food and fibre.

Gerald Leach
Chair Environment, Planning and Climate Change Committee
Victorian Farmers Federation



Source Figure 4 excel data Victorian Greenhouse Gas Emissions Report 2019



Source Victorian Greenhouse Gas Emissions Report 2019