



SUBMISSION

4 April 2024

Climate Change Team
Department of Environment and Water
Ground Floor, 81-95 Waymouth Street
Adelaide SA 5000

By Email: DEWClimateChange@sa.gov.au

Dear Sir/Madam

Re: South Australian Climate Change and Greenhouse Emissions Reduction (Miscellaneous) Amendment Bill 2024

Livestock SA is the peak industry organisation for South Australia's red meat and wool industries. There are over 5,200 sheep producers and more than 2,700 beef cattle producers in the state. With a membership of over 3,500 sheep, beef cattle and goat production businesses, we work to secure a strong and sustainable livestock sector in South Australia (SA).

The red meat and wool industries are the backbone of South Australia's livestock and meat processing sectors, which contribute \$5.4 billion annually to the state's economy.

Livestock SA is a member of Primary Producers SA (PPSA) and is the South Australian representative member of four national peak industry councils: Sheep Producers Australia, WoolProducers Australia, Cattle Australia and Goat Industry Council of Australia. Through PPSA and the peak councils, Livestock SA is also a member of the National Farmers' Federation.

Livestock SA acknowledges the South Australian Parliament declared a climate emergency in May 2022 and support proactive government actions that will assist our industry adapt to climate change. We welcome the opportunity to provide a submission to the draft Climate Change and Greenhouse Emissions Reduction (Miscellaneous) Amendment Bill 2024 (Bill), which is vitally important to our members and the long-term sustainability of SA's red meat and wool sector.

Background

In South Australia, livestock production occurs on over 50 per cent of the state's landmass; that is, on 84 per cent of South Australia's agricultural land¹. As such, livestock producers are heavily vested in amended legislation and will play a key role in its implementation in South Australia. If developed

¹ ABS Agricultural Commodities, Australia 2020-21, <https://www.abs.gov.au/statistics/industry/agriculture/agricultural-commodities-australia/2020-21>

with robust ongoing stakeholder consultation and underpinned by science and on ground learnings to date, the climate change legislation can provide much-needed clarity and a shared vision of SA's transition to a net-zero economy.

Agriculture is a unique sector in relation to climate change, with the ability to remove and store atmospheric carbon and contribute to emissions. Agriculture is also beholden to a natural biological cycle (in the land and the livestock), impacted by climate change, extreme weather events and geographic location. These complex factors make it difficult for livestock producers to manage emissions reduction strategically and quantify their achievements accurately. It is critical that the complex nature of these unavoidable challenges is well understood to ensure the sector is treated equitably and appropriately.

Agriculture is the focal point for closely integrated and sought-after global outcomes: ecological diversity, environmental stewardship, carbon sequestration and food security for a growing global population (the other 'inconvenient truth'). It is a unique balancing act that needs to be recognised.

Agriculture should not be expected to solve the carbon emission problems of industry and the community. The livestock sector will play its part, but each of us must take responsibility for reducing our emissions through practice change before looking elsewhere for assistance.

Given current scientific limitations, carbon neutral red meat and wool production is not feasible. However, 'climate neutral' output will soon be realised – sheep production is already there, and beef production will likely reach this significant milestone by 2026. Government and consumer expectations about food and fibre production must move beyond the current carbon myopic lens and become more holistic. Our sector has also significantly reduced net emissions, which is not appropriately recognised and rewarded. The amended South Australian legislative framework and supporting policies must address this.

Global temperature reduction targets (Paris Agreement) can be met by reducing (as opposed to eliminating) enteric methane production. Methane has a different warming potential than carbon dioxide, which should be recognised in target setting and their measurement.

The 'carbon-farming' environment is complex and volatile. It lacks consistency in language, methodologies, advice, and metrics. The risk of corruption and costly mistakes is high. Producers do not trust the system and lack the confidence to invest in emission-reduction management. Carbon farming policy and strategies are increasingly congested, with multiple (and largely uncoordinated) initiatives being rolled out at federal, state, and local levels. Producers need clarification.

However, despite all the above, the SA red meat and wool industry is committed to reducing its impact on climate change. This is evidenced by the incoming SA 2030 Red Meat and Wool Blueprint, shared along the whole value chain and aligned with relevant national and state plans.

The goal for the Blueprint's Environmental Pillar is:

- 'To enhance the natural environment and biodiversity of the land we farm, and to maximise our sector's contribution to climate change mitigation and resilience via a science-based, collaborative, whole of value-chain approach.'

The supporting Priority Areas designed to drive the achievement of this goal are:

- 'Drive down greenhouse gas (GHG) emissions'
- 'Increase soil health, enhance environmental stewardship and actively encourage biodiversity'; and

- ‘Extend seasonal availability and nutritional value of pasture and conserved feed’.

Response to draft Bill

3 – Amendment of Section 4 – Interpretation (page 2)

Livestock SA supports the proposed amendments to the definitions of ‘*climate change adaptation*’ and ‘*climate change mitigation*’, particularly with regards to their intended alignment with the SA Environment Protection Amendment Act 2023.

Livestock SA also supports the definition of ‘net greenhouse gas emissions’, noting the recognition of carbon credits sold outside of the state. It will be important to continue this careful allocation of emissions and offsets when developing the state-wide Emissions Reduction Plan (and subsequent target setting and progress reports) to ensure that agriculture’s net emissions are calculated accurately.

4 – Amendment to section 5 – Targets (page 3)

Livestock SA supports the amendment of the 2050 Target to better reflect contemporary global thinking, and the addition of an interim 2030 target to drive practice change and investment. This is important for reducing the increased risk of extreme weather events and drought, and it sends a clear message to the most lucrative international red meat and wool markets of SA’s climate change mitigation commitment.

Recommendation

The government also reassess state industry sectoral targets to better reflect this proposed interim 2030 and renewed 2050 target.

Livestock SA also supports the introduction of 5 yearly targets to better track progress, guide strategic decision making and reward progress. This interval process must maximise the opportunity for collaboration and co-design of initiatives to simplify engagement in climate change policies and programs for producers on the front line. Additionally, ‘reasonable and appropriate’ consultation determined by the Minister must include robust discussions with the red meat and wool sector and livestock production experts to ensure targets are verified by the latest evidence and supported by producers and value-chain participants.

Recommendations

The introduction of 5 yearly targets must also put in place processes to maximise the opportunity for collaboration and co-design of initiatives.

‘Reasonable and appropriate’ consultation determined by the Minister must include robust discussions with the red meat and wool sector and livestock production experts to ensure targets are verified by the latest evidence and supported by producers and value-chain participants.

It is important to also note that an estimated 10 per cent of red meat and wool producers have measured their baseline carbon footprint to date. Producers will need significant support to increase this number and to meet their ongoing reporting obligations against state targets. It is also imperative that a single metric and carbon footprint measuring methodology is selected and promoted to support a consistent language for benchmarking and reporting across governments and market credentialling.

Recommendations

Provide support for producers to baseline their carbon footprint and determine a single metric and methodology for measuring a business' carbon footprint.

Reassess state industry sectoral targets to better reflect this proposed interim 2030 and renewed 2050 target.

Renewable Electricity Target

Livestock SA is concerned about the bringing forward of the 100 per cent renewable energy generation in the state from 2030 to 2027. This change puts significant pressure on our producers (who farm the land where the renewable energy projects will be rolled out) as well as the renewable energy proponents and government teams tasked with challenging implementation targets. These shortened time frames have the potential to lead to costly mistakes and shortcuts, as well as reduced relationship building, consultation and negotiation time which may result in sub-optimal agreements between vested parties.

Request

Provide Livestock SA with a briefing a briefing on the rationale for why the target was brought forward 3 years and the processes that will be put in place to avoid/manage these risks outlined.

Livestock SA supports the government's intent (page 4) to:

- (a) acknowledge GHG emission reduction actions taken since 2005 (line 30),
- (b) seek advice from relevant experts (line 31) – we request ruminant livestock production expertise,**
- (c) take into account relevant methodologies and principles which apply interstate (line 32) – producers and processors operate across multiple jurisdictions and consistency is essential for ease of reporting,**
- (d) provide consistency with the best national and international practices (line 35) – the majority of SA red meat and wool is exported.**

10 – Insertion of sections 14A and 14B (pages 7-10)

Livestock SA supports the requirement to prepare a climate change risk assessment for the state and notes the importance to consider the broader implications of climate change risk and the mitigation strategies for regional communities, biodiversity, producer health and welfare.

The State Government should lead by example, and we support the preparation of plans by public sector entities, stressing the need for comprehensive consultation during this process. The implications of climate change and the associated public policies and community expectations are highly complex and evolving, particularly for livestock production. It is important that targets and plans drive practise change and do not regress into a tick-box exercise.

Recommendation

We note (page 9, lines 19-24) that the Minister can nominate a public sector entity to prepare a plan for a (industry) sector relating to emissions reduction or climate change adaptation or both.

If the particular (industry) sector already has a plan developed and owned by that (industry) sector, this plan should be referred to in the first instance and the public sector entity should be required to provide evidence to support any proposed changes. This approach will not only realise considerable

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efficiencies for the public sector entity(ies), it will also allow progressive sectors to drive their own agendas.

Other considerations

Livestock SA notes that no change is proposed for the Premier’s Climate Change Council. Given the acute position experienced by the livestock sector, we are surprised and concerned that a ruminant livestock production expert is not listed in the required membership. According to the National Inventory Report Volume I, in 2020-21 agriculture produced 16.8% of Australia’s net greenhouse gas emissions. Approximately 80% of the agriculture sector’s total emissions contribution were from methane emissions – mainly caused by the fermentation of plant matter in the digestive systems of ruminant livestock². These percentages will increase as heavy emitting sectors like energy generation reduce their emissions profile. It is important to note these sectors are receiving unprecedented government subsidies to decarbonise³.

Recommendation

Include a livestock production or livestock industry expert on the Premier’s Climate Change Council.

Summary

Livestock production holds a unique position in our state’s economy and regional prosperity. It contributes to food security, whilst also contributing to and sequestering greenhouse gas emissions. Livestock producers will also host much of the planned renewable energy generation and transmission infrastructure, and as the largest cohort of land stewards, they continue to increase the protection of SA’s natural environment and biodiversity.

While our sector has a demonstrated commitment to practice change and has reduced its net greenhouse gas emissions by 65% since 2005⁴, the community is expecting a lot from a complex system that is impacted by ever changing environmental and biological factors. Ongoing, meaningful engagement and unwavering support from the State Government will be needed to assist livestock producers effectively transition to the government’s emissions reduction agenda.

Please contact the Livestock SA office on (08) 8297 2299 or via email at admin@livestocksa.org.au if you would like to discuss this submission further.

Yours sincerely



Travis Tobin
Chief Executive Officer

² DAFF (2023), National Statement on Climate Change and Agriculture, <https://www.agriculture.gov.au/agriculture-land/farm-food-drought/climatechange/national-statement-on-climate-change-and-agriculture>

³ The Australian Government committed a record \$25 billion in its Budget October 2022-23 to clean energy spending. The South Australian Government committed \$593 million to building a world leading green hydrogen power station in its 2022-23 State Budget.

⁴ CSIRO & MLA (2023), Red meat industry makes huge headway in reducing greenhouse gas emissions, <https://www.mla.com.au/news-and-events/industry-news/red-meat-industry-makes-huge-headway-in-reducing-greenhouse-gas-emissions/>