Tasmanian Farmers and Graziers Association - Consultation Submission:

Tasmania's Draft Climate Change Action Plan 2023-25

13th April 2023

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Climate Change Office
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RE: TFGA Submission – Tasmania's Draft Climate Change Action Plan 2023-25

The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for agriculture in the state. Agriculture is a key pillar to the Tasmanian economy and the TFGA is committed to ensuring that the sector remains profitable and sustainable.

The TFGA has consulted on the proposed amendments detailed in this Bill with its Agricultural Sustainability Committee, with cross-commodity representation, as well as a number of national industry RDA's, such as Dairy Australia.

The TFGA is grateful for the opportunity to provide feedback to the Draft Climate Change Action Plan 2023-25. We have structured a number of areas for consideration as follows.

Goals of the Action Plan:

One of the 4 key goals outlined by the Tasmanian State Government in the action plan demonstrates a clear intent to maintain net zero emissions or lower in Tasmania by 2030, highlighting a number of initiatives to support this goal. In particular, the following points outlined to support this goal are linked to agriculture and forestry:

- *Improving the management of landscapes to support emission reduction and resilience, including through carbon farming and precision agriculture technologies*
- *Increasing new timber plantations, expanding the adoption of agroforestry in Tasmanian farming systems and reducing the conversion of plantations to other land uses*
- *Reducing livestock emissions by implementing livestock management strategies to reduce methane emissions, including through new feedstock types*

Key to the maintenance or reduction of the state's emissions is the need for the Tasmanian government to continue to work collaboratively with the primary production sector.

As the government would no doubt be aware, the national agriculture sector has taken leaps and bounds towards engaging in climate adaptive technologies, setting its own ambitious emissions

reduction targets and facilitating the continued uptake of innovative programs and solutions to mitigating agriculture's contribution to climate change.

Tasmania is no exception.

There are numerous examples of the agriculture sector showcasing its commitment to engaging in sustainable farming practices, with one example being the dairy industry (Tasmania's largest land-based agricultural sector[1]).

Since 2012, joint efforts between DA, ADF, ADPF and ADIC have seen the development and continued refinement of the Australian Dairy Sustainability Framework[2]. The contribution to this submission provided to this consultation phase by Dairy Australia/Dairy Tas highlights a non-exhaustive list of over 15 key research strategies and investments that support Tasmanian farmers to assess and manage greenhouse gas emissions. Other agricultural sectors are also setting their own targets to mitigate climate change, such as Meat and Livestock Australia (MLA), who has set an ambitious goal of carbon neutrality in the national livestock sector by 2030.

We believe that in an environment where such proactiveness by these sectors is evident, it is important to highlight that inflexible or overly complicated regulatory-based incentives and approaches to force uptake of sustainability measures are the least preferred by farmers. Not only does it negate years of industry-lead adoption of sustainable development and environmental stewardship in the agriculture sector, it causes unrest and distrust in policy setting processes amongst farmers.

The highlighted initiatives in the blue text above have direct association with the agricultural and forestry sectors.

In particular, point two has major implications for the primary production sector if policy functions are established to restrict conversion of plantations to other land uses. Farmers and foresters must maintain the freedom to alter their land uses as they see fit, allowing for changes in climate and markets to ensure that businesses are sustainable to allow continued investment in environmental sustainability.

An example of this is the focus and pressure to "…*reducing the conversion of plantations to other land uses*" may inadvertently restrict best practice for sustainability and climate change mitigation. If farmers and foresters wish to convert their plantations in the future to another farming system that incorporates, for example, rotational grazing that supports strong soil health and carbon storage, they should be free to do so. This is particularly important given that the agriculture sector is constantly evolving and innovating, and the most appropriate land use for a parcel of land can change over time.

Crucially, TFGA foresees an unintended consequence for the Government in aiming for a goal of "*Increasing new timber plantations, expanding the adoption of agroforestry in Tasmanian farming*

[1] Reference: https://nre.tas.gov.au/agriculture/facts-figures/tasmanian-agri-food-scorecards

[2] Reference: https://sustainableozcontent-prod.dairyaustralia.com.au/

systems…", that if farmers and foresters feel that they will struggle to ever change back to another land use, they may resist making the initial change to plantations in the first instance. The wording and intentions behind this perceived opportunity needs to be adjusted for it to be effective.

We would also make reference to the third point above in noting that, while there are existing advancements being researched and trialed on various feed supplements to assist methane reduction, there are notable challenges for uptake in the near future. Currently, as outlined in the submission made by DairyAustralia/ DairyTas, the commercial availability and demonstratable efficacy of these solutions is a number of years away. The TFGA would like to see state government support to encourage industry lead benchmarking initiatives and early adoption of emissions reduction solutions where appropriate and applicable.

Priority 1: Information and Knowledge

Intentions outlined in the action document for this priority describe "*bringing together Tasmania's extensive climate change knowledge and resources to develop a suite of resources that meet users needs*".

This is an important action, particularly to ensure that farmers have access to user-friendly resources that helps them make informed decisions for their businesses. Importantly however, the agriculture sector, through the peak industry bodies for each commodity, are engaging in a body of work to pull together the different commodity-specific frameworks, data and information into an Australian Agriculture Sustainability Framework[3]. It is important that any action for the Tasmanian Government to bring together the information at a state level to develop resources, needs to incorporate the work already completed by industry bodies like Grains Research and Development Corporation or Dairy Australia. TFGA is willing to support the Tasmanian Government to ensure that this information and research is incorporated appropriately, for a whole-of-picture input for agriculture in the state.

Another action outlined in Priority 1 is to support the development of climate change resources for schools, having already developed a Renewable Energy Education Package for Tasmanian schools.

Having not reviewed this package and noting that there appears to be a focus only on renewable energy, the TFGA would note that it is important that there is no commentary in this package that targets farmers. Highlighting some of the potential ways that agriculture more broadly might be contributing to a changing climate is appropriate, but the work that farmers have already undertaken to mitigate and adapt to climate change must be incorporated into any current or future climate change curriculum development to ensure a balanced curriculum.

The Tasmanian agriculture sector is already struggling to attract young people to work in the primary production sector, so curriculum development must in no way vilify the agriculture sector or tarnish the good work that has been progressed for several decades.

[3] Reference: https://nff.org.au/programs/australian-agricultural-sustainability-framework/

The TFGA also notes a key action in this priority to celebrate the efforts of communities, business and organisations to take action on climate change. Importantly, farm businesses must be included in this to demonstrate positive on-farm initiatives that are being undertaken. A challenge to conducting this action effectively however, is making sure that the Government does not put any one business (be it farm business or otherwise) on a pedestal, setting a precedent of 'best practice' and thus indirectly suggesting that those that don't follow suit are not engaging in climate-smart initiatives effectively.

Adaptation and mitigation efforts will always look different on each farm. For some, it means incorporating solar power infrastructure, for others it may be engaging with landcare to revegetate along fence boundaries and for others it might be incorporating feed supplements. Celebrating any initiative taken, no matter what it looks like – without suggesting all must follow suit – will be an extremely positive step forward for the Government and will encourage great adoption of adaptive measures that suit specific businesses.

Priority 2: Transition and Innovation

With reference to energy specific actions outlined in the Emissions Pathway Review, the reduction of diesel use in the agriculture industry is highlighted as a focus in the medium term. A key barrier to transitioning towards new technology that utilises renewable energy sources is cost. Energy is a fundamental component to farm activity and without reliable sources that fit within already tight margins, farmers are unlikely to make significant capital investment unless transitions are heavily subsidised, there is market confidence and see they real benefits to productivity and outputs. In the medium term, government should look towards agricultural specific projects that map pathways of future technologies to market in Tasmania, working closely with equipment suppliers, for example. Furthermore, subsidies and grants for connecting existing renewable energy production to the grid may also incentivise increased adoption of these technologies and increase the viability of these solutions that exist currently.

Detail of future intentions of focus for the Government in the Emissions Pathway Review table also highlights a desire to reduce agricultural soil emissions through precision agriculture and regenerative farming practices. As noted above, it is important to encourage environmental stewardship in our farming community broadly, rather than focussing on a small list of potential solutions. Some evidence suggests that the practical benefits of regenerative agriculture as a mitigation for climate change specifically (rather than simply generating environmental benefits) is variable, and in some instances modest at best[4]. While regenerative practices have benefits, they are not necessarily the most effective strategy for all farming systems to try to integrate for maximum emissions reduction initiatives. Therefore, while it may be appropriate and beneficial for some, consideration needs to be given to ensure that it is not perceived as 'best-practice' for all agriculture sectors.

[4] Reference: https://www.wri.org/insights/regenerative-agriculture-good-soil-health-limited-potential-mitigate-climate-change

With reference to the intended development of sector specific emissions reduction and resilience plans, the TFGA is pleased to see a commitment from government to collaborate with industry to developed these plans. The TFGA welcomes consultation on behalf of the agriculture sector with the state government to ensure that such plans are fit-for-purpose and are reflective of the sector differences and regional contexts.

Priority 3: Adaptation and resilience

The TFGA sees the value and supports the delivering of projects that support business, industry and the community to be more resilient and adapt to a changing climate. We would encourage the government to consider projects that address existing, real world challenges faced by farmers in the immediate to short term following adverse weather events, such as flooding or bushfires. The TFGA would appreciate the opportunity to workshop strategies and priorities with the government to ensure that grant opportunities are maximised from committed funding, and that delivery models have consistency to ensure relationships can be built with farmers to generate the best possible adoption of improved practices.

We request ongoing liaison and engagement broadly on the goals and initiatives outlined by the Tasmanian State Government to be sure that agriculture's interests are not undermined or negatively impacted in any future policy development. We welcome contact following receipt of this submission to discuss its content in more detail.

Yours sincerely,

Ian Sauer
TFGA President