



QUEENSLAND
FARMERS'
FEDERATION

Clean Economy Jobs Bill 2024

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Clean Economy Jobs
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The united voice of
Queensland agriculture

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This submission is provided to:

To: Clean Economy Jobs, Resources and Transport Committee

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Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Queensland Chicken Meat Council
- Pork Queensland
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Queensland Oyster Growers Association
- Lockyer Water Users Forum

About the Queensland Farmers' Federation



The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

We are a member-based organisation representing the interests of peak agriculture industry organisations (both state and national). Through our members, QFF represents more than 13,000 primary producers across the cotton, cane, horticulture, dairy, nursery and garden, poultry, pork, and intensive animal industries.

We unite the sector to engage in a broad range of economic, social, environmental, and regional issues through advocacy, policy development, and project activity. We work with the government of the day on behalf of industry, farmers, and the community to provide powerful representation and contribution to the policy direction, sustainability, and future growth of Queensland's agriculture sector.

Our Council of member representatives and policy committees set the strategic priorities for policy development and advocacy, while our Board ensures our corporate governance.

QFF draws on the expertise and industry knowledge of our members, and through our commitment to collaboration and considered policy development, we lead Queensland's agriculture sector towards a strong future, ensuring our members are ahead of the game and have a voice at the table on the issues that matter to their members.

Submission

QFF welcomes the opportunity to provide comment on the Clean Economy Jobs Bill 2024.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Position

The Clean Economy Jobs Bill 2024 aims to create additional and individual emission reduction targets for industry, as the net zero by 2050 target approaches. By legislating the targets and the development of emission reduction plans per sector, the Bill aims to decarbonise the state's existing industries and attract investment in new green industry opportunities.

Labour is a key input to Australian agriculture. The current skills shortage is having a direct impact on farm with many enterprises struggling to source an appropriately skilled workforce to run their businesses. Demand is outstripping supply in a range of areas from machine operators, truck drivers, agronomy, animal husbandry and farm managers through to marketing, technology, data analysis, research and development, climate adaptability, finance and banking. The list goes on. Agriculture needs a workforce strategy that addresses current skills and future skills and a focus on economic and employment opportunities across the entire supply chain, not just one aspect.

QFF does not support the Bill in its current form and continues to advocate for a policy environment that considers the supply chain in its entirety and supports farmers to continue their efforts to reduce GHG emissions through ongoing best practice, increased efficiencies and the adoption of appropriate technology. QFF is concerned that a top-down approach through the implementation of the Bill will not allow for the recognition that the sector has already made significant advancements in emission reductions but are continually challenged with limitations as to what further reductions they can achieve with the current available technologies.

Specifically, Part 3 (11)(12) of the Bill would allow the minister to create emission reduction plans for specific sectors (i.e. Agriculture) without any legislated consultation with industry. It is critical that industry is considered a partner in any pathway to reducing emissions. Part 4 (Division 2), establishes a Clean Economy Expert Panel to provide advice on targets and ways to reduce emissions, without any legislated inclusion of industry representation appearing to be listed within the Bill. QFF would encourage ensuring industry representation is part of any Expert Panel that is established and ensure the remit of the Panel includes a wholistic view to include economic, social and environmental considerations in deliberations and advice. QFF would advocate that the best outcomes will be achieved through a partnership with industry and supporting farmers to innovate and continuously improve, rather than through legislation.

While the explanatory Bill paper states these targets would not be 'imposed' on industry, it will create potentially unachievable and unrealistic blanket targets for industry to be judged against. The 'accountability and transparency' of government emissions reduction that the explanatory paper says the Bill will achieve, will fall back to the industry on which the emission targets are enforced. Whilst farmers are engaging in this space and achieving emission reductions through a range of means including increased energy efficiencies, reduced nitrogen fertiliser application and best practice farming techniques, it is unreasonable to expect farmers to have to speak to emissions targets they were not a part of establishing.

The Sugarcane industry, for example, has seen growers adopt practices that improve efficiency and reduce on-farm emissions and the industry also recognises its potential to assist the broader economy through opportunities such as the development and production of green electricity, bioethanol, sustainable aviation fuel (SAF), biodiesel and bioplastics from sugar cane feedstocks.

With individual farmers and the sector more broadly doing so well when it comes to the implementation of ESG, legislating a target on emission reductions in isolation is likely to create unintended outcomes which see negative outcomes for industry, regional communities and the environment.

Last year ABARES released an independent report [Here](#) outlining that Australian farmers are leading the world when it comes to sustainability and ESG more generally. Quoted from the report "Australia's emission intensities are below the average for cereals, cattle and specialist beef production, compared to the major agricultural exporters" and "Compared to other significant agricultural producers, Australian farmers use less fertiliser, have better nutrient balances on their land and use more sustainable cropping practices," This is a result we can all be proud of and is a result that farmers have achieved without legislated blanket targets, but through the adoption of best practice, understanding of science, incorporation of technology and efficiency in relation to inputs such as fertilizer and energy.

The Key findings from the report are summarised within the report as follows:

- Australian agriculture has an internationally enviable environmental sustainability record.
- Australia's use of pesticides and fertilisers are amongst the lowest in the world, tillage practices are minimally disruptive to biodiversity, environmentally harmful subsidies are practically non-existent, and Australia has shifted large swathes of land out of agriculture and into conservation.
- Australia's emissions intensities are below average for cattle, specialist beef production, and grains compared to major developed country producers and exporters, and Australia has reduced agricultural emissions more, percentage-wise, than most other developed countries in the last 30 years.

The report also states "Understanding environmental sustainability requires an understanding of the diversity of natural environments and agricultural production systems" and that "A one-size-fits-all approach does not recognise this diversity".

QFF believes the introduction of legislated, top down emission reduction targets that farmers are expected to meet could add another cost burden to farming enterprises further threatening their global competitiveness and viability. QFF however, supports the intentions behind an emissions reduction plan but submits that this should be implemented through *supporting* industry by creating affordable, sustainable, collaborative opportunities for farmers and other industries to lower their emissions, such as:

- Funding pilot trials and research for new technologies such as green hydrogen, organic fertiliser development and ammonia infrastructure to make space for these homebased production opportunities.
- Extending energy efficiency rebate programs such as QBEST would provide continued support for farmers in their efforts to reduce emissions and make it more affordable for farmers to adopt energy-efficient alternatives.
- Extending energy or carbon saving programs, similar to the Energy SQ program offered through QFF to support farmers in assessing their environmental performance by providing them with a comprehensive overview of their emissions profile.
- Providing support for farmers to conduct baselining for their enterprises and understand carbon and other emerging environmental market opportunities so that they are able to make informed decisions that will ensure future farm viability and achieve environmental outcomes.
- Considering emission reduction targets within a dynamic context that integrates environmental outcomes, a viable future for food and fibre production, strong regional communities and a proactive, science-based approach to climate adaptation.
- Increased investment into research and development that aims to foster the commercialisation of effective, practical, impactful alternatives to a range of enterprise

inputs and operations that will support farmers transition to a cleaner economy in a cost effective and sustainable way.



QFF would support the second aim of the Bill to 'support the creation of more job opportunities in Queensland's emerging clean economy industries and in existing industries', but advocates for this to be achieved without imposing targeted emission limits on industry but rather through a wholistic, collaborative, partnership approach with a focus on entire supply chain opportunities.

Summary

QFF is unable to support the Bill in its current form, including sector-by-sector emission reduction plans and targets. It is widely reported that cities are linked to approximately $\frac{3}{4}$ of global carbon dioxide emissions and that in fact according to the national accounts, agriculture is one of the only sectors in Australia to have successfully and significantly reduced its net emissions over the past 25 years. Agriculture is indeed also one of the only sectors that is actually capable of achieving nature positive results through best practice land and water management, with the right support, science, technology and on farm innovation.

Farmers are currently under significant pressure from increased costs of production, labour shortages, extreme weather events and increased margin squeezes which are putting farm enterprise viability at risk which has the potential to have flow on effects on the cost of living and future food and fibre security.

A blinkered approach to simply reducing emissions as a response to environmental and climate concerns through legislating hard targets is a high-risk strategy for Queensland and for future food and fibre production. A wholistic approach based on partnerships and collaboration is required to support farmers to continue their sustainability journey, to build resilience and preparedness through climate adaptation measures based on the best science we have at hand.

QFF requests that the committee recommend the removal of sector emissions reduction plans from the bill for the agriculture sector and works with farmers to support agriculture to improve efficiencies, adopt technology and best practice to make further emission reductions that are realistic, and importantly build resilience, preparedness and climate adaptation capacity. The agriculture sector needs to have realistic ambitions for emissions reductions that do not compromise food and fibre production but rather supports farm viability and the sector's capacity to achieve nature positive outcomes in a way that is profitable and therefore sustainable over the long term.

QFF appreciates consideration of this submission and would welcome the opportunity to continue to work with government to achieve decarbonisation goals through working with industry to ensure environmental outcomes, effective climate adaptation initiatives and a viable future for food and fibre production.

Yours sincerely



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