Environmental Protection (Powers and Penalties) and Other Legislation Amendment Bill 2024

Submission No: 18

Submitted by: Australian Lot Feeders' Association

Publication:

Attachments:

Submitter Comments:

Level 5, 131 Clarence Street
Sydney NSW 2000
GPO Box 149
Sydney NSW 2001
Telephone: (02) 9290 3700
Facsimile: (02)9290 2808
Website: www.feedlots.com.au
A.B.N. 16 009 928 018

7 March 2024

Health, Environment and Agriculture Committee
Queensland Parliament

Sent via email: HEAC@parliament.qld.gov.au

Australian Lot Feeders' Association (**ALFA**) appreciates the opportunity to provide a submission for the Inquiry into the Environmental Protection (Powers and penalties) and Other Legislation Amendment Bill 2024 (the **Bill**).

ALFA is the Peak Industry Council representing 349 accredited cattle feedlots, with approximately 1.2 million cattle on feed. The majority or 60% of those feedlots and cattle on feed are in Queensland. The feedlot industry makes up 47% of the cattle slaughtered in Australia and contributes to over 35% of Australia's total beef exports. As a key contributor to a trade-exposed industry, up-stream supply chain operators, such as meat processors, retailers, and exporters, rely heavily on the feedlot industry for the supply and export of high quality, safe, grain-fed beef to feed families in Australia and abroad.

It is acknowledged that the Bill aims to facilitate a more proactive approach to environmental risk management to prevent the community from being exposed to harm and remove barriers to streamline timely and effective regulatory responses to manage and restore environmental harm which has occurred. ALFA would like to bring to the Health, Environment and Agriculture Committee's (the **Committee**) attention the proactive work being undertaken by the feedlot sector to prevent and minimise environmental harm.

Approximately two-thirds of Australian cattle are grass fed, spending their entire lives grazing on grasses and pastures. The remaining third are grain fed, spending most of their lives grazing grasses and pastures before being fed a grain-based diet in feedlots. At any one time around 4% of the Australian cattle herd are being fed in feedlots. The Australian grass and grain fed production systems are highly complementary, interrelated and dependent upon each other.

Feedlots were born out of necessity in Australia. The simple reason being that many regions in Australia do not produce enough grass to feed and nourish cattle year-round. Even though all Australian cattle are raised on grass, feeding a grain-based diet in purpose-built facilities (called feedlots) is a complementary system that ensures cattle can be nourished year-round despite the varying environmental conditions and therefore allowing beef to be available for consumers at all times. Feedlots help Australia provide a consistent supply of beef to both domestic and export markets, as well as an option for farmers to 'finish' cattle that may not otherwise meet processor specifications. The ability for feedlots to consistently feed cattle despite changes in seasonal conditions is beneficial to Australia's beef production system as it provides Australia, and major trading partners, with a more consistent and sustainable supply of beef products.

Beef production is generally more efficient in a feedlot as more beef can be grown using less cattle, emissions, land, feed, manure and water. So apart from producing great quality beef, grain feeding is regarded as a highly efficient and sustainable option for producing beef for consumers and for maintaining a sustainable environment.

Feedlots contribute to the prosperity of rural and regional Australia, playing an important role employing 2,000 people directly and 30,000 people indirectly. The Australian economy would shrink by $10.2 billion and shed 49,000 full-time employees if feedlots ceased to exist.

FEEDLOT INDUSTRY'S ACTIVE INVESTMENT TO PREVENT AND MINIMISE ENVIRONMENTAL HARM

Sustainability and the impact of grain-fed beef production on the environment has long been a key consideration for the feedlot sector. As such, sustainability and caring for our environment is a key component of the Australian grain fed beef industry's mission. Few industries are as acutely aware of the need to protect and sustain the areas they operate in. The one eternal problem facing Australian cattle producers is availability of grass. Extreme seasonal conditions are a common occurrence. Sending cattle to feedlots makes a positive contribution to land sustainability as it reduces overgrazing and allows adequate re-growth of grassland. Additionally, cattle on grain-based diets at feedlots reach their ideal weights more quickly than they would on grass. Less time on grass results in a measurable reduction in carbon emissions.

Feedlots also play an important role in food-waste management due to the feedlot utilising lower-grade human food production by-products as safe and nutritious ration ingredients. This efficient use of what would otherwise be wasted is an example of how the Australian grain fed beef industry continues to nourish land and create a better environmental footprint. Cattle manure is a valuable source of nutrients and organic matter for improving soil structure and fertility, and crop or pasture production. Feedlots will generally recycle manure to either use themselves or sell as fertiliser.

The grain fed beef industry operates environmental management procedures under the guidance of the National Feedlot Accreditation Scheme (**NFAS**) which covers all aspects of environmental management including surface water and ground water, as well as environmental incident reporting.

Research and development within the feedlot sector, has also led to the increased adoption of shade and covered housing. Whilst covered housing is usually adopted to control climate and minimise the effect of adverse weather conditions, and improve cleanliness and the welfare of cattle, there is secondary benefit of minimising odour and/or effluent runoff.

Further, the feedlot sector along with others in the Australian red meat industry have set a target to be carbon neutral by 2030 (**CN30**). This means that by 2030, Australian beef, lamb and goat production, including lot feeding and meat processing, aim to make no net release of greenhouse gas (**GHG**) emissions into the atmosphere. Meat and Livestock Australia's (**MLA**) investment into CN30 research, development (**R&D**) and adoption aims to enable and empower the red meat industry to achieve the target, reduce operating emissions while maintaining productivity gains.

Ruminant animals, like cattle and sheep, are often linked to climate change because they emit methane. But often overlooked is the fact this enteric methane is part of a natural – or biogenic – carbon cycle, in which the methane breaks down into carbon dioxide (CO_2) and water after about twelve years. Grass then absorbs the CO_2 through photosynthesis, ruminants eat the grass, and the cycle continues. In contrast, methane released from fossil fuel extraction has been stored underground through geological processes over millions of years and CO_2 from burning fossil fuels continues to build up and heat the atmosphere over centuries. This natural carbon cycle means that the reporting of climate-related information in the agricultural sector is complex and requires specialist skills and expertise to accurately report.

The CN30 target demonstrates that the livestock industry is proactively addressing emissions and taking action to improve long-term productivity. To date, the Australian red meat industry has decreased annual emissions by 57% towards our target or the equivalent of diverting 133.36-

54.61 Mt of greenhouse gases from entering the atmosphere. By taking action, the red meat industry pre-empts current and future market expectations regarding environmental credentials which will allow red meat producers to stamp their mark in a competitive global protein market. CN30's suite of innovation will also deliver win-win benefits for producers, including productivity gains and profit drivers through the carbon market or premium supply chains. The lot feeding industry is well positioned to contribute towards the industry's goals of net zero emissions.

Feedlots are an important part of the beef supply chain, providing a high level of production efficiency and lower greenhouse gas emissions per unit of feed intake than grazing cattle. Any measures taken by lot feeders to reduce emissions must be practical and economically viable to meet commercial realities. ALFA and its members recognise the need to continually engage with, and in relation to sustainability and emission reduction. Through industry led initiative such as CN30 and the Australian Beef Sustainability Framework, the feedlot sector is taking steps to grain-fed beef is produced in a way that is socially, environmentally and economically responsible.

OPPORTUNITIES FOR ENGAGEMENT WITH LOT FEEDERS AND THE AGRICULTURAL INDUSTRY

There is the opportunity to support lot feeders and the agricultural industry by providing a regulatory environment that recognises the work of industry and provides opportunities for industry to demonstrate its contribution to duty to prevent and minimise environmental harm. ALFA recommends that the Environmental Protection Authority (EPA) work collaboratively to provide industry specific advice and support industry to meet the general environmental duty requirements.

Further, ALFA shares the concerns of other industry bodies regarding the lack of national harmonisation across the environmental regulatory environment. As a national industry this creates considerable challenges for the pork industry and creates inequity and disincentives for investment. Consideration should be given to how the proposed law aligns with those in other states and within the emissions reduction strategies and other climate change mitigation actions being proposed by local, state, territory and federal governments. Harmonisation of Australia's environmental laws and regulatory frameworks should be considered a priority.

Thank you for the opportunity to provide a submission to the Committee for consideration, and look forward to further engagement. Should you have any questions, please contact [redacted] or [redacted].

Sincerely,

[redacted]

Michael Lancaster
General Manager – Policy and Biosecurity
Australian Lot Feeders' Association