



11 October 2022

Committee Secretary
Senate Standing Legislative Committee on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

Via email: ec.sen@aph.gov.au

Dear Committee Secretary,

RE: Environment Protection and Biodiversity Conservation Amendment (Climate Trigger) Bill 2022

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Committee regarding the *Environment Protection and Biodiversity Conservation Amendment (Climate Change) Bill 2022*.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the length and breadth of the supply chain. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

As stated in the NFF's submission to *Environment Protection and Biodiversity Conservation Amendment (Climate Trigger) Bill 2020*, the NFF reiterates that it does not support a climate trigger being incorporated into the Environment Protection and Biodiversity Conservation 1999 (EPBC Act).

Successive Australian Governments have elected to adopt specific policy mechanisms to implement their commitments to reduce emissions. The Independent Review of the EPBC Act completed by Professor Graeme Samuel agrees that these specific mechanisms, not the EPBC Act, are the appropriate way to place limits on greenhouse gas emissions. Additional triggers in the Act would only add to uncertainty and duplication, creating additional difficulties for farmers to manage the landscape.

A climate trigger would not materially influence the emissions associated with the decisions taken on projects. Therefore, the benefits (or lack thereof) that would be created with the introduction of this proposal would not outweigh the additional regulatory burden that would be imposed. If a proposed project, which would resolve other supply chain issues in Australia, for example a fertiliser plant, is unable to be established, this would be a significant disincentive and a perverse outcome, especially where it may also reduce GHG emissions.

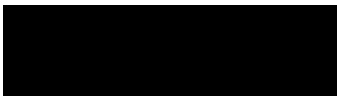
If the intent is to reduce emissions, there is no explanation for what additional benefits a climate trigger would create that would not otherwise be captured



under existing frameworks, or other emissions reduction programmes. The NFF suggests that emissions reduction should continue to be considered separate to the EPBC Act and therefore rejects any climate trigger proposal.

In addition to these points, the discussion about the EPBC Act is broader, and this issue should be considered in the consultation process not this piecemeal approach.

Yours sincerely,



TONY MAHAR

Chief Executive Officer