

# SUBMISSION TO CARBON POLLUTION REDUCTION SCHEME - GREEN PAPER

Name of organisation: *Biological Farmers of Australia Co-op Ltd and Australian Certified Organic Pty Ltd*

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Comments from Biological Farmers of Australia Co-op Ltd

Carbon Pollution Reduction Scheme – Green Paper July 2008

The Department of Climate Change

**Submission theme: “It’s under our feet and in our hands”**

**Submission focus: Agricultural and land use industries**

**Organisation: Biological Farmers of Australia**

**Biological Farmers of Australia** Co-op Ltd (BFA) is a broad based, member owned industry association servicing the needs and interests of farmers, value adders, marketers and consumers with an interest in organic foods and fibres produced from sustainable, resilient, biological farming systems.

BFA is proudly renowned for its pragmatic, business and productivity oriented approach to the future of agriculture and food production in Australia. BFA is Australia’s largest member based and services oriented representative network within the organic sector.

BFA views that this future must be an organic and biological future, if there is to be profitable and productive Australian agriculturalists well into the 21<sup>st</sup> century. It must also be a future that is commercially viable for farmers, supported strongly and convincingly by pro-organic government policies and backed by realistic levels of organic oriented R&D to build on this industry’s successes in productivity and resilience as well as its eco-system services benefits, as is now being verified in the EU from multi-year, multi-country research.

The BFA has over 20 years of experience in representing and servicing the organic and biological agricultural and food sectors, and owns the now increasingly well recognised brand “**Australian Certified Organic**” with the **Organic Bud** logo in the Australian and overseas marketplace, while certifying the majority of organic farmers, value adders and marketers, large and small, in Australia via its certification subsidiaries.

**Comment and recommendations in relation to the green paper:**

- The Green Paper **mistakenly leaves agriculture out** of an emissions scheme now, when progressive, **biological** and **organic farmers would stand to benefit** from an immediate integration into a trading scheme in 2010;
- At the absolute least the “opt-in” option for forestry in the short term (2010 – 2015) should be extended to agriculture generally, as BFA questions the notion that there are “practical difficulties” that cannot be resolved in a short period of

time. Indeed the BFA views this proposed lack of action at this point as an easy political position to take, while missing what arguably could be the **biggest single optimal positive impact on carbon abatement and sequestering: organically/biologically managed soils;**

- Water and Natural Resource Management **Policies** have in large measure arguably **failed to enhance the uptake of this type of farming** system in Australia. Such policies will continue to fail to incentivise farmers to move to biological farming systems practice, in the absence of involvement in a carbon trading scheme or similar recognition and financial benefit for such practices;
- This omission (of agriculture) is a fundamental flaw in any approach to culture and practice change, as, similar to drought relief policies of a naturally drought stricken land over the past century, such **policies** combined with **stand-back approaches** have **assisted and subsidized those least interested in change, least invested in the future and least likely to be around productively producing** foods and fibres for the longer term, in particular to 2050;
- Meanwhile **organic farmers**, and farming systems can naturally **sequester** and increase **carbon** (via increasing and protecting humus in soils), reduce carbon loss by holistic and integrated farming systems practices, and **eliminate carbon emissions in the first place** by not relying on synthetic, fossil fuel reliant inputs such as synthetic fertilizers and pesticides. In short, **the solution is under our feet and already in the hands of leading organic agricultural practitioners;**
- Such practitioners in Australia however, unlike their overseas counterparts, receive little in support either in subsidies, or in R&D to progress their industry practices. The **move to a CPRS offers the opportunity** to change this, in a **market driven, industry invested** way, **delivering increasingly productive agriculture** and high level value adding of foods and fibres;
- Our agricultural systems must move away from over reliance on synthetic inputs and fossil fuels (directly and indirectly via synthesized fertilizers) if these systems are to remain both viable and long term resilient, productive and therefore profitable;
- There remains a **fundamentally flawed** view of “**productivity**” in agriculture, both within government policies, R&D investments, and commercial activities in Australia that must change for agriculture in Australia to truly remain productive and resilient in the time frame 2010 – 2050;
- Organic farming systems are becoming progressively recognised via science, which is catching up with long established practices by farmers, as carbon sequesterers as well as reducers of carbon footprint of farming systems;
- A **poor understanding** of this domain **by the Australian scientific community, policy makers** and some farmer organisations **should not be an excuse to ignore this opportunity for Australia** and leading innovative Australian farmers. European research in this regard is highlighting Australia’s lack of action and investment in this domain as an embarrassment, while dampening Australia’s innovative responses to both market demands and environmental imperatives for change in agriculture;
- The green paper notes that agriculture and food production is threatened, but **fails to engage in a structural critique of Australia’s currently fragile and**

- unsustainable agricultural and food production systems**, including this sector's continued over reliance on synthetic inputs and fossil fuel use, and practices that continue to "burn out" carbon out of the soil, by the very killing of the soil biology that puts it there in the first place. **Many of these practices continue to be viewed as positive within the current mono-cultural "productivity" paradigm. A CPRS would drive definitive change in this, ensuring that real, and long term productivity is delivered for Australian farmers;**
- **Australian farmers cannot afford to be left behind** other nations and their competing farmers in relation to benefits that could accrue directly to the farming sector from active involvement in a CPRS, even this at the least is at an "opt-in" level in the immediate term. This issue should be actively taken by the hand, rather than it taking the farming sector by the throat at a later date due to inaction;
  - If action is not taken now, rather than hiding behind a veil of consultation, further committees and scientific claims of complexity, Australia will be **missing** not only the **biggest opportunity** to make the **largest single impact on emissions and sequestration**, but also misses a turning point in our ability to act **decisively** to enact real, **meaningful change** towards more **resilient** and **productive farming** systems for the medium and long term future.

<p><b>The BFA calls on the Federal Government to:</b></p> <ul style="list-style-type: none"> <li>○ bring agriculture forward into a trading emissions scheme prior to 2015 where there is potential for Australian farmers to benefit via sequestration and the related ecological benefits that can be provided by such practices;</li> <li>○ enable organic and biological farmers to "opt-in" to any scheme from 2010, recognizing the carbon sequestering and buffering benefits that arise from such practices and which comply with auditable, internationally recognised organic standards;</li> <li>○ recognise that involving agriculture in a CPRS would lead to systemic review of policies, R&amp;D investment and related agricultural support programs that currently remain either at best poorly resourced, or are in fact antagonistic to both understanding and expanding practices of biological/organic farming methods in Australia, while assisting in catch up with both the US and EU in this regard;</li> <li>○ use significant proceeds from any CPRS trading scheme to invest in fundamental and profound R&amp;D change in biological and organic farming systems research, as well as joining with the now maturing and self regulating organic farming and food industry sector in co-investing in the development and growth of this market and consumer driven sector.</li> </ul>
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While BFA views that there has arguably been an over fixation on carbon as the single agent of concern in relation to climate change and extreme weather conditions, what is clear is that resilience in agricultural and food production systems will not be achieved without a **fundamental and profound rethink in government policies, R&D programs and subsidies within agriculture** that continue to prevent or limit carbon emission reductions and sequestration of any meaning in agricultural practices within Australia.

For too long in Australia there have remained poorly structured policies and implemented plans which work against the interests of farmers working to internalize the very costs of carbon pollution and related pollution from agriculture. Organic farmers, with clearly articulated, well and long established international standards for agricultural production, are examples that can be **drawn on right now** in relation to **working models** to deliver carbon sequestration and emission reduction benefits.

In addition to this, a drier climate drives the imperative to be more efficient with water use and to conserve water on farm via enhanced holding capacity of well managed soils. Carbon held in humus in well managed, biologically active farm soils is a key part to this water management issue. Another key, now being verified by European research, is the confirmed lower carbon emissions footprint from organic farming methods, versus non organic. In some instances this footprint has been confirmed to be halved. (See ref)

In this environment it is essential for our farming systems to move to more biologically oriented systems and organic agricultural practices, and for there to be both policies and schemes (such as the CPRS) that enhance the incentives for farmers to move towards more biological and organic production systems.

#### **Organic farming standards criteria as a key in carbon management includes:**

- A fundamental farming systems focus on soil health, building soil humus (and therefore C sequestration) and recycling nutrients within the farming system.
- A non reliance on fossilized fuel based fertilizers and pesticide inputs, along with a requirement to reduce and recycle energy, water and nutrients on farm wherever practicable.
- A requirement in the Australian Organic Standard to both harbour ecosystem and farm system diversity, as well as to establish biodiversity refuges.
- Active use of recycled organics inputs – further reducing greenhouse gases otherwise produced from landfilling or inappropriately utilizing such resources.
- A focus on the creation of resilient, sustainable farming systems that enable optimal production of foods and fibres ensuring long term, rising, productivity and profitability.

- The above farming systems are based on well established, internationally recognised, organic standards and world accredited certification and auditing programs.

Organic certification agencies in Australia currently audit organic farming systems on an ongoing basis for compliance to the organic standards. These standards include requirements for “maintenance or increase” in soil organic matter levels through time. This is happening now, not a theoretical notion or a science project waiting to be funded. Such existing systems can easily and quickly be adapted to include specific C measuring and monitoring within the existing auditing and certification programs.

While the industry is a paragon of self regulation and is market driven, to create significant increase in uptake of farming systems practices oriented towards organic and biological farming systems, a fundamental rethink in policies and R&D in support of this sector is essential. **Inclusion of agriculture, in addition to the “opt-in” option for organic farmers in a carbon trading scheme from 2010 will generate sufficient momentum to generate changes that will take in some cases 5 – 10 years to manifest.** A further delay of 7 years will only place Australia’s agricultural systems in further peril, further along a track of unsustainability and with a real risk of drastic **drops in productivity** due to a loss of the very **bedrock** upon which **resilient and productive farming systems** are based: **biologically healthy and carbon rich soils.**

Failure to take up this challenge by 2010 would not only be a **manifest failure of imagination and foresight** by the Federal Government, but also an act of potentially very **serious negligence**, placing future generations of Australian farmers and Australian citizens in peril, while also failing to take **long overdue actions** to enhance the long term **productivity and sustainability of our agricultural resources.**

If action is not taken now, rather than hiding behind a veil of consultation, further committees and a claim of complexity, Australia will be missing not only the biggest opportunity to make the largest single impact on emissions and sequestration, but also misses a turning point in our ability to act decisively to enact real, meaningful change towards more resilient and productive farming systems for the medium and long term future.

**Challenging some of the assumptions and assertions currently being made in response to agriculture and the green paper:**

The claim that there are “*Limited commercially viable cost effective measures for farmers....*” is ludicrous and ill informed. The organic industry is but the tip of an iceberg of proven, existing opportunities for farmers to increase carbon levels in their soils, and benefit commercially as a consequence.

The claim that there is first a need for a “*New stream of research and development to be in place, before agriculture is included in 2015*” is cart before the horse, not the other way around. Science will catch up with this area, based on assessing existing models of auditing and standards setting that the organic sector has proven and working models for.

The claim that the government needs to “*Avoid cannibalising productivity based R&D in the process*” completely and fundamentally misses the point and highlights how poorly understood are some of these organic and biological alternatives and offerings. Some of the core assumptions relating to current policy and R&D purportedly oriented towards “productivity” in fact may well be hampering Australia’s ability to even remain on current production par in the coming decades ahead, let alone raising productivity. Further, such productivity at its core is often monoculturally focused on single commodity outputs, further overlooking and exacerbating problems associated with a change towards carbon emission management and abatement (ie much productivity is in fact running directly counter to lower emissions and less reliance on high amounts of inputs to achieve the same, let alone higher, outputs).

The claim that we must approach this in a “*Measured and sustainable way...(such that food production and the national economy are not threatened.*” We would applaud the first part and note that in relation to the second, our food production and national economy are, and will remain threatened until more biological approaches to farming systems are supported by policy and real investment in R&D from government.

We have no time to waste and therefore view it as essential that agriculture is included earlier, and given every support and opportunity to move towards more biological and organic approaches for its long term sustainable and productive future, in a carbon constrained economic world.

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## Annex 1

### **Letter to the Editor, published in the Australian 6.8.08**

It is heartening to see in “Forests to the rescue on climate” (4.9.08), a refocus on nature as a cornerstone in effective management of planetary carbon cycles. What has been missed is that while forests, old and new, can and do play a key role, it is that part of the biosphere called soil that sustains those very plants that is the hidden potential windfall for boosts in carbon absorption and sequestration. And soils ain’t soils, as farming systems ain’t farming systems.

But the Green Paper on this matter has so far missed the point. A lack of comprehensive understanding and agreed measuring of carbon sequestration across soil types should not be the excuse for not including this natural recycler and sequestering medium in the carbon solutions bag. Soil is fundamentally the most effective medium for this, recognized even by the US Department of Energy.

Organic and biological farming systems are only now being taken up by mainstream farmers after decades of proof of their efficacy in the field. At the heart of their systems approach is non reliance on fossil fuel based fertilizers and pesticides, while focusing on recycling of nutrients, water and energy on farm. Most fundamentally it is about a focus on biological activity in the soil, which builds humus, which means carbon sequestering. Nature does it, if you let her. Numerous government policies and subsidies, as well as neglect and misunderstanding, have for years however stood in the way of this.

The organic food and farming sector in Australia is a treasure trove of examples of common sense, nature based, approaches to resolving what appear to be intractable planetary threats. As more consumers are realizing this and buying such products, it is about time that organic farming approaches were recognized, and incorporated, as keystone elements of our government’s approach to climate change management and carbon sequestration.

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