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The Chair
NPI Review Steering Committee
Department of Environment and Energy

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Dear Review Committee

Submission to the Review of the National Pollutant Inventory Discussion Paper

Australian Pork Limited (APL) is pleased to make a submission on the National Pollutant Inventory (NPI) Discussion Paper. APL thanks the Australian Government for initiating this important review. APL appreciates the need for the NPI to provide access to information about emissions and the transfer of potentially polluting or harmful substances to the community, industry and government.

APL is the peak, national representative body for Australian pig producers and an Australian Government funded Research and Development Corporation (RDC). The Australian pork industry employs more than 36,000 people in Australia and contributes \$5.2 billion in gross domestic product to the Australian economy. APL is a producer owned, not-for-profit company that delivers marketing, export development, research and innovation and strategic policy initiatives to secure a profitable and sustainable future for Australian pig producers.

In this submission, APL will consider the NPI in its current state and present options for consideration to the Review Committee for improving the approach going forward.

1. Current State of the NPI

APL appreciates the role of the NPI in tracking emissions and making this information publicly available. We acknowledge the following positive aspects to the current NPI approach:

- It provides a nationally coordinated approach to collecting and reporting information on emissions from industries
- It addresses the public's "right to know" about the potentially dangerous emissions entering the environment, and
- It makes industries accountable and provides them with a means to benchmark their environmental performance against their peers and other industries.

Equally, there are several uncertainties and concerns with the current NPI approach:

- In its current form, the NPI is collecting inaccurate and incomplete information about emissions from Australian industry
- The NPI requires industries to report a "gross" rather than a "net" figure for emissions. As a result, the NPI does not provide a true picture of the emissions profile and does not encourage emissions abatement activities, such as biogas production and use
- Personal and business contact information is currently available to the public on the NPI website. APL is concerned that this may constitute a breach of privacy, and this

information has been used to locate pig farms for trespass and other activities unrelated to emissions. APL has made this point repeatedly over the last decade

- The NPI Emissions Estimation Technique Manual for Intensive Livestock – Pig Farming, was only partly updated in 2007. The methods used are inconsistent with recent research findings and require review and update, and
- There are significant inconsistencies between the estimation techniques for the NPI and those used by the National Greenhouse Gas (NGHG) Inventory, particularly for ammonia produced by piggery effluent.

2. Future State of the NPI

Going forward, there are a few options available to the Government for development of the NPI, including:

1. Option 1: do nothing – continue with the current NPI reporting framework and approach
2. Option 2: address the issues of the existing NPI framework and harmonise the techniques and reporting approach with the NGHG inventory, or
3. Option 3: remove piggeries from the NPI reporting framework in favour of industry self-regulation, with data collection and reporting by industry to fit a harmonised NPI and NGHG framework.

In considering each option, our thoughts on the implementation pathway are as follows:

Option 1: do nothing – continue with the current NPI reporting framework and approach

APL believes this is not an option. As described above, the current approach is not effective in delivering an accurate and complete emissions profile for Australia.

Option 2: address the issues of the existing NPI framework and harmonise the techniques and reporting approach with the NGHG inventory

APL's preferred option is that the government uses this review to address the problems with the current NPI approach and harmonise the NPI and NGHG emissions estimation techniques and reporting processes. APL has identified the following issues to improve the NPI.

- a. The data collected and reported through the NPI for emissions from industry is incomplete

Intensive pig producers are only required to report ammonia and fuel emissions if they exceed set NPI thresholds. To our knowledge, only 66 piggeries report emissions to the NPI. Therefore, data collected by the government through the NPI process only provides a picture of emissions from a proportion of pig producers Australia wide and does not reflect the emissions from the range of different production systems.

APL does not rely on NPI data to inform industry policy because it is incomplete and consequently, APL would not advise pork producers to rely on the NPI data to benchmark their performance. APL is concerned that Australian Governments have used NPI data to inform policy, which has directly impacted on pig producers.

One such example is the tiered license fee structure currently used in the Queensland Environment Protection Regulation 2008. These use Aggregated Emissions Scores (AES) to rank industries based on their environmental impact and charge fees accordingly. In 2016, APL commissioned an independent review by Integrity Ag of the Queensland license fee structure. The study found that AESs for different industries were developed using data collected from the NPI. These do not consider the emissions abatement activities pig producers were undertaking on farm. The preferred approach by pig producers is that where data from the NPI is used to establish fees (such as the AES approach in

Queensland), a net-based approach should be utilised so fees are proportionate to the emissions profile of production rather than the current gross-based approach.

b. The NPI Emission Estimation Technique Manual for Intensive Livestock – Pig Farming is out of date and requires review

The estimation techniques of the NGHG inventory and the NPI framework are inconsistent. The method currently utilised under the NGHG follows the research outcomes of Steve Wiedemann et al in 2014. These research findings and approach are yet to be adopted through the NPI (partially updated in 2007), thus leaving the two estimation techniques inconsistent. Further, APL recommends the methods used to estimate emissions from pig production need to reflect changes in production systems, the variety of production systems, and the many advances in emissions abatement technology used on farms.

APL believes a “net” rather than “gross” figure for emissions should be reported to the NPI¹. This is critical to account for and encourage emissions reducing activities undertaken by industry. For example, conventional piggeries use covered pond systems to capture and burn biogas to generate electricity for use on farm and sell it back to the grid. The present NPI framework does not allow producers to reduce the emissions estimate they have to report by the amount of emissions they offset with emissions reducing technologies. A net-based approach will also facilitate reduced fees for producers as their emissions profile will be accurate.

c. The NPI and NGHG inventory reporting methods should be streamlined

APL questions the need for both inventories as there is overlap within the NPI and NGHG inventory reporting and inconsistencies in the reporting methods used. The current approach is both inefficient and inconsistent for producers who are required to report emissions data to two different inventories. APL recommends harmonisation of the two processes to allow for consistent, accurate, and streamlined reporting.

d. Producer information should not be made publicly available through the NPI website

The NPI website currently makes details such as physical addresses and phone numbers of reporting entities public online. No other government department or commercial business would be allowed to publish individual information under the Privacy Act. Moreover, publishing the location of pig production sites leaves producers vulnerable to trespass and other associated behaviour from activist groups. This type of behaviour poses a significant biosecurity risk to producers. APL has raised this with governments on numerous occasions over the last decade. The only change was to allow piggeries to use the state or national representative organisation address. Adverse impacts to individual producers and animal welfare and biosecurity impacts to pigs over recent years cannot be undone.

Option 3: removal of piggeries from the NPI reporting framework in favour of industry self-regulation

The Australian pork industry is extremely proactive in reducing its environmental impact. It continues to invest significant funding into research, innovation and technologies in a range of environmental areas including nutrient management, greenhouse gas emission reductions, soil health, by-product reuse and outdoor production. We believe pork has the potential to be the most emission friendly animal protein source of the future.

APL, in partnership with the Australian, State and Territory Governments, academic institutions and producers, has developed a range of tools and initiatives designed to reduce the environmental impact of pig production including:

¹ APL understands that this approach is also supported by state governments, and as such, APL has commissioned development of a tool that will allow producers to report net emissions.

- The National Environmental Guidelines for Indoor Piggeries (3rd Edition Revised, 2018) (NEGIP), which delivers a national approach to environmental management of Australian piggeries. The guidelines developed with industry, community and government provide a general framework for managing environmental issues in pig production. They cover topics such as planning, site selection, separation and buffer distances, cleaner production, housing design and management, effluent management systems, reuse areas, nutrient content of by-products, carcass management, monitoring, chemical storage and environmental management plans.
- Almost 90 per cent of the pork industry is certified under the Australian Pork Industry Quality Assurance Program (APIQ[✓][®]) and producers are independently audited on farm. This industry standard contains environmental guidelines which require piggeries to identify and manage risks in an Environmental Management Plan with guidance from the NEGIP.
- The Australian pork industry has developed a Greenhouse Gas (PigGas) Calculator, which provides pig producers with a tool to calculate their enterprise emissions and identify ways to reduce them. The calculator models the emissions from any piggery production and manure management system combination using the methodology and calculation protocols developed by the Australian Government for its international reporting obligations.

The pork industry is also highly regulated under state and local environment and planning legislation, which requires pig producers to pay significant license fees to operate. In addition, pig owners must hold a permit to keep pigs, have a Property Identification Code (PIC), have a brand or NLIS accredited device to identify pigs, and to use the PigPass to track and record the movement of pigs.

Based upon the existing industry approach, APL recommends the Review Committee considers removing the obligation for pig producers to report under the NPI framework and empowering industry bodies, such as APL, to collect and report their own emissions data based upon both a harmonized NPI/NGHG and industry best practice approach. With support from government, there may be potential for the industry to modify its existing databases and programs to collect, monitor and report accurate emissions data.

APL thanks the NPI Review Committee for the opportunity to make these comments on behalf of the Australian pork industry and that this feedback will be considered positively for improving emissions reporting from industries into the future.

APL would be happy to discuss the comments provided in this submission and provide copies of the industry standards, guidelines and tools mentioned above. Should you require further information or have any questions, please contact Grantley Butterfield, Policy Manager – Planning and Environment, on 02 6270 8820 or grantley.butterfield@australianpork.com.au.

Yours sincerely



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