



**Australian Pork
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NSW EPA

Via [consultation site](#)

Australian Pork Ltd (APL) appreciates the opportunity to provide a submission to the NSW EPA consultation on the proposed [Climate Change Licensee Requirements](#).

APL is the national peak industry representative body for Australian pork producers. APL is a producer-owned company responsible for marketing, export market access, research, innovation and extension and strategic policy advocacy to assist in securing a profitable and sustainable future for the Australian pork industry.

During 2024, the Australian pork industry contributed more than \$6.9 billion to the Australian economy. This figure represents the over-arching contribution to the economy including primary and secondary processing. The industry produced 470,502 metric tonnes of pork. All fresh pork in Australia is domestically sourced, with around 85% of Australian pork produced used domestically and the high value export market supporting the domestic market taking 57,294 metric tonnes in the 2024 calendar year.

The pork industry supports a wide variety of careers throughout the food supply chain. Nationally, the industry supports more than 36,000 jobs, with the majority based in regional Australia, playing a vital role in strengthening local economies, community wellbeing, and individual livelihoods. The pork industry workforce is highly skilled, specialised, and typically employed in secure, permanent roles. APL is the primary contact regarding pork industry research, development and extension priorities, current industry evidence and information, and strategic policy needs. APL is unique in this way and is the one body representing every aspect of the Australian pork industry. APL holds several official roles on behalf of the Australian pork industry.

APL is:

- The Rural Research and Development Corporation for the industry. Established through Federal legislation, APL is responsible for leading research, development, and extension in partnership with the Australian government and the research community. Our statutory obligation is to deliver industry innovation and research and development services on behalf of all industry levy payers.
- The market access, trade and marketing arm of the industry, including managing industry campaigns such as "Get some pork on your fork". The national peak body for the Australian pork industry. We represent pork producers and the supply chain across jurisdictions and within national and state and territory representative frameworks.
- Leading the Australian pork industry's Sustainability Framework implementation supporting benchmarking and accountability against the goals within the four sustainability pillars.
- The pork industry signatory to the Emergency Animal Disease Response Deed (EADRA), representing the entire pork supply chain within Animal Health Australia, and where required, within the decision-making structures which would manage an emergency animal disease response.

Climate change and pork producers

The pork industry, through our sustainability framework, has committed to being a low emissions producer of protein by 2030. We are currently tracking well, with an average emissions intensity of 3.3 kg CO₂-e per kilo of liveweight in 2020, which has decreased by 73% (from 10.6 kg CO₂-e per kilo of liveweight) since 1980. This makes pork the second lowest emissions protein choice after chicken. In total, pork production accounts for only 2% of agricultural emissions and 0.4% of national emissions.

Recognising the potential impacts of climate change on their businesses and communities, pork producers are striving to continue to reduce their carbon footprint and build resilience in their businesses. As a result:

- 49% of pork producers use solar power,
- 16% are operating biogas facilities,
- 17 piggery projects are currently earning ACCUs through applying the Federal Government's Animal Effluent Method.
- 78% of reuse effluent on crops;
- 44% recycle water on farm; and

- 58% compost bedding and manure.

The Australian pork industry has been at the forefront of research, technology and extension to help reduce farm emissions and build resilience to climate and drought impacts. Examples include:

- improving energy efficiency of sheds and equipment, and/or installing energy generation infrastructure such as solar panels;
- improving pig housing to allow better airflow and temperature management;
- better management of effluent including methane collection and energy generation;
- recycling water for shed flushing to reduce potable water requirements;
- adopting improved technologies such as feeders and drinkers to minimise water spillage and wastage;
- researching alternative protein sources for pig feed such as cotton waste and insects;
- collaborating with other agricultural industries such as dairy and meat processing to understand opportunities to pool resources, maximise recovery and limit waste to landfill; and
- maximising reuse of effluents, manures and spent beddings for fertilisers to reduce reliance on chemical fertilisers.

APL's recent R&D Green Paper, and subsequent open Expressions of Interest (EOI) call, provides an avenue for the funding of innovative projects. The industry recognised priority has remained a focus on collecting the data required to develop the tools that industry needs to make and also be able to demonstrate positive change.

APL would like to take this opportunity to highlight the challenges faced by smaller producers. There is an opportunity to recognise the hurdles these producers face and to support them to implement emissions reduction technologies to their fullest. The key identified limitation is the lack of scale making the costs and pay-back of projects such as biogas innovations non-viable. Rather than requiring resources to be allocated to developing reports and plans, these producers would benefit from additional support and incentivisation for smaller scale emissions reduction projects. There is an opportunity to provide a clearer and easier regulatory framework to support producers to invest in new, smaller scale, innovative emissions reduction opportunities.

Given the available resources and extensive climate planning already undertaken by pork businesses and APL on behalf of the broader industry, **APL recommends supporting**

implementation of existing industry-developed plans, research and projects, rather than applying new reporting and planning requirements on individual producers/businesses. This support could include incentivisation of projects through funding mechanisms as well as simplification of the current regulatory framework, which is creating barriers to innovation.

Requiring licenced premises to undertake additional reporting and planning will impose cost and time penalties on the pork sector. These costs will not be imposed on non-licenced agricultural sectors, or pork producers in other states. This will create an unequal playing field across agriculture, unfairly reducing the competitiveness of NSW pork producers.

APL would recommend an alternative approach and does not support the roll out of the proposed additional climate reporting requirements to all pork EPA licence holders. This will place additional burden on pork producers and create an unequal playing field across agriculture.

APL continues to support Australian pork producers to produce nutritious, low emissions, affordable and safe proteins, and we look forward to working in partnership with governments to develop initiatives that ensure that producers can do so while also reducing their on-farm emissions and building climate resilience. Please contact Megan Hill, Manager Environment and Sustainability Policy, at [REDACTED] to discuss these issues further.

Yours sincerely

A handwritten signature in dark ink, reading 'Tanya Pittard'. The signature is written in a cursive style with a long, sweeping underline that extends to the left.

Tanya Pittard
General Manager, Policy and Industry Engagement