

Thank you for the opportunity to provide feedback on proposed new requirements for certain EPA licensed businesses in relation to emissions monitoring, reporting and reduction.

EAM represents NSW and Qld dairy farmers and we regret to advise that we have only just become aware of this consultation process, so can only provide general feedback at this stage. We note that some individual farmer members have appreciated receiving information.

Given this, EAM has not been able to speak with all NSW large scale farmers at this point.

In our industry, the new requirements cover all licensed dairy farms (milking more than 800 cows triggers EPA licensing), but very few (if any) are at or approaching the 25 000 tonne CO2 emissions trigger for CCMAP and other requirements.

One NSW farmer (milking approximately 2 500 grazed cows on an EPA licensed farm) understands their farm emissions are approximately 13 000 tonnes - calculated via the Dairy Farm Monitor Project.

For the purposes of meeting the new requirements and this consultation, our question is how will it be confirmed that they do not need to comply with the new reporting? Will there be a 'self assessment and declaration' requirement or will the EPA conduct its own measurement of licensed farms to assess if they meet the new trigger?

Should licensed farmers be required to verify with independent information that they are not approaching 25 000 tonnes, EAM requests that they be able to access the foreshadowed Grants Program to fund such studies.

EAM also submits that where any assessments or recommendations are being considered in relation to carbon reduction measures in dairying (such as pasture varieties etc), farmers need to be directly involved in those decisions with economic sustainability a critical consideration.

Whilst it may be that no NSW dairy farms will be required to adopt the new requirements, we do note that the new reporting would be administratively onerous, especially for the scale of NSW operations that do not have dedicated and specialist staffing to comply. In those circumstances, farmers would need to draw extensively on the proposed Grants Fund.

Again, we appreciate this opportunity provide feedback (albeit brief) and we look forward to additional information requested above, and being kept in the loop as this process continues.

You can contact myself, CEO Eric Danzi [REDACTED] or EAM Board Member and Farmer Ruth Kidd (email above) if you wish to discuss our input.

Regards,

Denise

Denise Spinks GAICD
Government Relations Manager
[REDACTED]



(07) 3236 2955
Level 8, 183 North Quay, Brisbane 4000
PO Box 13061 George Street, Brisbane
4003