



TO THE

Ministry of Foreign Affairs and Trade

ON THE

Consultation for the Update of New Zealand's Approach to International Climate Change Negotiations

BY

Beef + Lamb New Zealand Ltd

SUBMISSION ON NEW ZEALAND'S APPROACH TO THE 2023 INTERNATIONAL CLIMATE CHANGE NEGOTIATIONS

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Contents

About Beef + Lamb NZ.....	3
1. Summary of recommendations	3
2. General comments	4
3. What should NZ be seeking to achieve?	5
4. How should NZ Engage at COP	6
5. Setting an example and GHG metrics.....	7
6. Specific negotiation questions.....	10
6.1 Global Stocktake	10
6.2 Nationally Determined Contributions	10
6.3 Agriculture	11
6.4 Forestry.....	13
6.5 International cooperation on mitigation	14
6.6 Biodiversity and Nature-Based Solutions.....	15
6.7 Just transition.....	16
6.8 Response measures.....	17
7. Conclusion	17

About Beef + Lamb NZ

B+LNZ is an industry-good body funded under the Commodity Levies Act 1990, through a levy paid on all cattle and sheep slaughtered in New Zealand. B+LNZ represents both Māori and Pākehā sheep and beef levy-payers and has the mandate to submit on their behalf on matters that affect them.

The sheep and beef sector is essential to maintaining the vibrancy of rural communities and their cultural, societal, and environmental wellbeing, as well as contributing regionally and nationally to the country's economic wellbeing. Export revenue from New Zealand's red meat industry for the year ending 31 December 2022 was \$11.4 billion, with this making the sector New Zealand's second largest goods exporter, generating approximately 16 percent of New Zealand export revenue. The sector supports over 92,000 jobs, 35,702 directly and an additional 56,719 indirectly employed. The sector exports over 90 percent of its production and is New Zealand's second largest goods exporter and New Zealand's largest manufacturing industry. New Zealand accounts for around 5 percent of global beef trade and 33 percent of global sheepmeat trade.

B+LNZ is actively engaged in environmental management, with a particular emphasis on building farmers' capability and capacity to support an ethos of environmental stewardship, as part of a vibrant, resilient, and profitable sector based around thriving communities. Protecting and enhancing New Zealand's natural capital and economic opportunities and the ecosystem services they provide is fundamental to the sustainability of the sector and to New Zealand's wellbeing for current and future generations.

Just under a third of New Zealand's total land area is used for sheep and beef (mixed agriculture), comprising about three quarters of pastoral lands. Sheep and beef farmers manage approximately 2.8 million hectares of native habitat, including 1.4 million hectares of native forest. This is the second largest holding of native forest and native biodiversity in the country and represents almost 25 percent of New Zealand's remaining native vegetation. This places NZ sheep and beef farmers as significant kaitiaki of NZ native vegetation.

The sheep and beef sector understands the importance of keeping temperature rise within prescribed limits as critical to the wellbeing of New Zealand and the world as we currently know it. As stewards of the land and the natural resources it is home to, sheep and beef farmers are at the forefront of the impacts of climate change. Farmers are already seeing those changes on an everyday basis and are continually updating adapting their management practices. They will continue to do so, as they have adapted to changes in the past.

Sheep and beef farmers are up to the challenge of playing their part in the actions needed to achieve the Paris Agreement. Most recently as part of our commitments to the He Waka Eke Noa Partnership, we developed a GHG calculator to help farmers understand their on-farm emissions, with over 95 percent of commercial sheep and beef farmers now knowing their emissions and 55 percent already having a plan to manage them.

1. Summary of recommendations

- 1.1 Beef and Lamb New Zealand continues to support the key issues on the Climate Change Negotiations Mandate from COP26, which will also be used as the mandate for COP28. We seek to ensure that the prioritised negotiations mandate is expanded upon for the reasons below.
- 1.2 We commend the New Zealand Government's ambition to seek a leadership role internationally in order to provide an effective global response to climate change.
- 1.3 **We continue to urge the New Zealand government to advocate for a position that clearly prioritises how emissions should be managed over the long term to eliminate their warming impacts.** Reductions of biogenic methane would reduce warming in the short term but are not a long-term solution when compared to reducing emissions of other gases that also come with co-

benefited methane reductions from fossil fuel sources. Pushing for reductions in biogenic methane above what can be achieved with new technologies and farm management practices risks reducing global food production and contributing to increased food insecurity as farmers increasingly face production pressures caused by a changing climate.

- 1.4 **We recommend that the split gas approach taken domestically in New Zealand be promoted by climate negotiators internationally as a means of addressing the same issues alternative metrics are designed to resolve.** That is, the issue of comparing different greenhouse gases and their impact on warming as the basis for informing action and policy priorities. This approach should be taken while also progressing further work on more fit-for-purpose alternative metrics (such as CGTP and GWP*)
- 1.5 If New Zealand negotiators wish to remain consistent with the Paris Agreement and the Sharm el Sheikh “Joint work on the implementation of climate action on agriculture and food security” (previously the Koronivia Joint Work on Agriculture (KJWA)), **we encourage them to push for outcomes that recognise the fundamental importance of safeguarding food security while also reducing impacts on the climate.** New Zealand is currently world leading with our efficient, pastoral based agricultural systems that incorporate biodiversity into farm management. Additionally, the He Waka Eke Noa Partnership with Government, representatives of iwi/Māori and industry working together to tackle on-farm emissions is the first we know of to collectively design a farm-level emissions pricing system for agricultural emissions. However other countries will not follow our lead if we cannot demonstrate that our approach to climate change does not impact food production.
- 1.6 We support New Zealand’s position that “in the Koronivia Joint Work on Agriculture, and in other relevant fora, [it will] encourage other countries to take mitigation action on agriculture.” This support should be complemented by recognising the fundamental priority of safeguarding food security and ending hunger, and the particular vulnerabilities of food production systems to the adverse impacts of climate change, as is consistent with the Paris Agreement.
- 1.7 **We request the climate negotiators be given an additional agricultural mandate to promote the emissions efficiency co-benefits of pursuing agricultural trade reform and reducing trade distorting agricultural policies.**
- 1.8 We further request that climate negotiators be given an additional agricultural mandate to promote the potential emissions mitigation and climate adaptation benefits of the research, development, and uptake of innovative agricultural GHG technologies.
- 1.9 COP28 comes at a crucial time, where the results of the Global Stocktake will be announced and countries discuss the next Nationally Determined Contribution (NDC), to be submitted by all countries in 2025. It should not be a surprise when the results of the Global Stocktake are released and outline how the world is failing to make the required reductions needed to keep global warming under 1.5 degrees and this will increase focus on development of countries’ NDC2.
- 1.10 In order to support development of NDC2, **New Zealand should advocate that best practice NDC’s be set in both GWP100, and by separate gas. This would allow for accurate calculations of the warming effects of each country’s emissions and highlight areas for focus.** This would reflect New Zealand’s domestic approach, set out in the Zero Carbon Act, which has separate targets for different gases based on their lifetime and warming impact. For countries with a higher proportion of short-lived gases to long-lived gases, this would provide additional clarity on the warming effect of their emissions and at what point their emissions will stop contributing to increased warming.

2. General comments

- 2.1 Beef + Lamb New Zealand welcomes the opportunity to submit to the Ministry of Foreign Affairs and Trade (MFAT) on New Zealand’s approach to the 2023 international climate change negotiations. We note that the consultation covers a large range of issues, although not all of them are relevant to sheep and beef farming in New Zealand. This submission aims to address the parts

of the consultation where New Zealand sheep and beef farmers have significant interest in seeing practical solutions achieved at COP28.

- 2.2 Beef + Lamb New Zealand has a long history of engaging in climate policy in New Zealand and internationally. This includes engaging in both policies designed to mitigate greenhouse gas (GHG) emissions as well as policies designed to improve New Zealand's ability to adapt to the impacts expected to occur as a result of climate change.
- 2.3 Beef + Lamb New Zealand is an active supporter of the Global Research Alliance on Agricultural Greenhouse Gases, in particular the workstreams relating to livestock. We strongly support the continuation of this group and others like it as a means to share knowledge, build partnerships and find solutions to emission and mitigation problems. Beef + Lamb New Zealand is also a partner of the Agriculture Innovation Mission for Climate.
- 2.4 Beef + Lamb New Zealand is committed to the New Zealand agricultural sector achieving a 2050 goal of becoming warming neutral, as is consistent with the 2015 Paris Agreement. Such a goal demands that short-lived (flow) GHG emissions (biogenic methane) are reduced, but not to net zero, by 2050. It also requires long-lived GHG emissions, mainly nitrous oxide and carbon dioxide, be reduced to net zero by 2050. The cumulative effect of long-lived (stock) gases on global warming requires emissions of long-lived gasses to reduce to net-zero, whereas short lived gases need to be reduced slightly and stabilised. This is supported by the New Zealand Climate Change Commission in their recommendations to the New Zealand Government on how the country should meet its Paris Agreement Targets.
- 2.5 Beef + Lamb New Zealand was closely involved in the development of, and is a signatory to, the He Waka Eke Noa Primary Sector Climate Change Commitment. He Waka Eke Noa is an active partnership between primary industry groups, the Government, and representatives of iwi / Māori.
- 2.6 Through He Waka Eke Noa, partner organisations are working to develop a framework by 2025 that will equip farmers and growers with both skills and tools to reduce their on-farm agricultural greenhouse gas emissions and adapt to climate change. The He Waka Eke Noa partnership aims to enable sustainable food and fibre production for future generations. He Waka Eke Noa is a partnership that was initiated by farmer organisations and is dependent on the continued support of farmers for its future viability.
- 2.7 It is our hope that He Waka Eke Noa represents a framework for farmer-driven action that can not only succeed in New Zealand, but also serve as a template for similar agricultural climate action internationally. However other countries will only follow our lead if we can demonstrate that emissions reductions can be done in a way that does not impact food production. This means setting appropriate targets for emissions reductions while also recognising sequestration and co-benefits in terms of improving other on farm objectives, such biodiversity and animal welfare.
- 2.8 Agricultural emissions must not be cut at the expense of meaningful reductions to long-lived industrial CO2 emissions, as this reduces future food carrying capacity of the land while shifting the problem of reducing industrial emissions onto future generations. Current ETS settings are driving these outcomes as it is cheaper to offset CO2 emissions through the ETS than it is to make meaningful cuts to emissions. This demand for ETS units is driving rapid conversion of productive sheep and beef farms to carbon forestry, reducing food production. This is contra to the Paris Agreement's Article 2, which seeks to reduce global warming in a way that does not threaten food production. Given this inconsistency, it's highly unlikely other countries will view this as an appropriate model to adopt.

3. What should NZ be seeking to achieve?

- 3.1 New Zealand should be seeking to be seen as a leader on combatting global warming, both in international negotiations and through our domestic policies and actions that will reduce temperature increase. We should also seek to hold others to account, and to increase international ambition across all sectors of the global economy.

- 3.2 This needs to be done in a way that brings likeminded countries together and provides solutions to the problems that are being addressed. It needs to work with current institutions and uphold international cooperation on mitigation, adaption, and finance.
- 3.3 To be successful, New Zealand must partner with likeminded partners to build consensus on issues where we have expertise and lead the development and implementation of policies that can be adopted by others. New Zealand has previously been successful in leading international groups across a range of sensitive issues by starting small and gathering like-minded partners together. We support the New Zealand Government continuing this approach regarding climate change with the Agreement on Climate Change, Trade, and Sustainability (ACCTS) and urge that it also be applied to questions of policy, such as using appropriate metrics to understand the warming impact of agricultural greenhouse gases.
- 3.4 B+L NZ supports the removal of environmentally harmful subsidies being a significant focus of New Zealand's negotiating mandate, whether they relate to fossil fuels, agriculture, or fisheries. We note that while progress has been made with regard to fisheries subsidies at the World Trade Organisation (WTO), challenges remain on fossil fuels and agriculture. The 1995 WTO Agreement on Agriculture resulted in a significant reduction in the most trade distorting domestic agricultural support, however, recently there has been a significant increase of 'green subsidies' which aim to address environmental issues. These support schemes are frequently miscategorised and do not achieve stated environmental objectives. In the worst cases, they may exacerbate environmental conditions by removing market and environmental signals that would otherwise encourage farmers and growers to better align production with land use capability. Some of these support schemes encourage overproduction, lock farmers into unsuitable farming practices, interfere with market signals, distort trade flows, while disadvantaging producers in developing countries that are not able to match levels of developed countries government support.
- 3.5 Leadership and International cooperation: There are already many groups and coalitions that New Zealand is part of, however there are none that seek to address how biogenic methane should be treated. Because of this uncertainty, and the current use of GWP 100, climate change policy for agriculture is haphazard and there is no consensus on what appropriate targets are for biogenic methane. New Zealand should create, and lead, a group of like-minded nations focused on developing appropriate targets for ruminant agriculture. Such an approach would capitalise on the existing view that New Zealand is as a leader on this issue due to our split gas domestic target, our HWEN partnership, and our low emission agricultural systems.
- 3.6 Support for sustainable food production: The New Zealand government should be seeking to position New Zealand as a leader in sustainable food production and farming practices. New Zealand sheep and beef farmers are already among the most efficient in the world when looking at emissions per kilo of product and have made significant improvements in the past 30 years, with gross emissions reducing by 30 percent since 1990 while production has stayed similar. This improved environmental efficiency has come as a result of investment and improvement in farm management systems and genetics, demonstrating that subsidisation is not required to improve environmental and economic outcomes.
- 3.7 New Zealand's contribution to global food security, particularly nutrition through the provision of high-quality red meat ensures that millions around the world have access to healthy diets. New Zealand farm systems are managed in a way that incorporates multiple objectives, such as protecting biodiversity, improving animal welfare and productivity while staying competitive in international markets. Our farmers are custodians of nature and provide an example of how food production can be done in a way that minimises negative and maximises positive environmental outcomes.

4. How should NZ Engage at COP

- 4.1 New Zealand should seek to build partnerships and work with like-minded countries and organisations on relevant issues. For agriculture, this means other countries who have ambitious climate goals and are demonstrating progress towards them in a way that does not impact food security.

- 4.2 We need to take a principled approach, where we utilise the most up to date science to set policies and stay away from joining partnerships or signing up to pledges that do not align with our domestic split-gas approach. For instance, a consensus on how to best address biogenic methane emission will remain out of reach until it is separated from methane derived from fossil fuels and long-lived gases.
- 4.3 We should be seen as a supportive partner for initiatives that are working to address salient climate change issues that are also being faced in New Zealand, including how to mitigate agricultural emissions without impacting food production and how the agricultural sector can best adapt to climate change.
- 4.4 We need to showcase how we are taking a leadership role on many of these issues in order to provide others with viable, commercially manageable pathways to follow. As leaders, we should also be honest in the difficulties being faced that have resulted in not getting policy settings right e.g., the impact of wholesale farm conversions to carbon farming on food production, rural communities, and tangata whenua. Given the work that has been undertaken within the agricultural sector over the last few decades, highlighting agricultural productivity and the ability to establish, and maintain, successful and resilient farm systems without state support provide examples of where New Zealand can lead at COP28. While the development of New Zealand's agricultural sectors was a result of a range of commercial factors, successive Governments have played a facilitative role by providing an ecosystem of outcomes focussed policies where farmers can make decisions based on what is best for their land and farming system. This demonstrates that heavy government involvement in agricultural policy and increased subsidies is not necessary to achieve environmental outcomes.
- 4.5 Regarding our Treaty partnership with Māori and how we engage at COP we believe that Māori should be at the table now and continue to be at the table for future discussions. When looking at promoting Māori approaches to managing land we should support Māori participation at COP. There are a number of current initiatives that have played a huge role in agricultural behavioural change and land use practices that could be utilised as international models for both adaption and mitigation for climate change.
- 4.6 If New Zealand is to take a leadership position on agricultural climate change, we should also have representatives of our agricultural sectors at COP. This is both to articulate clearly how we have got to the position we are in now and how we are approaching challenges in the future. It would demonstrate to other countries as well as our farmers at home that the New Zealand Government is working in partnership with the agriculture sector in a constructive and proactive way and provide an example for others.

5. Setting an example and GHG metrics

- 5.1.1 As outlined throughout our submission, a key priority for New Zealand should be to demonstrate leadership in addressing climate change in order to provide an example for other countries as the globe sets policies for achieving the Paris Agreement.
- 5.1.2 A key issue for New Zealand and the world is how agriculture should be treated, and in particular ruminant agriculture due to its high emissions of biogenic methane, a potent but short-lived greenhouse gas. Because New Zealand has a relatively unique emissions profile as a developed country with a high proportion of methane emissions to carbon dioxide we will be looked to as an example, provided we can set and achieve policies that adhere to the Paris Agreement target of keeping global temperature increase to under two degrees, with an aim to keep it under 1.5 degrees, while also protecting food production.
- 5.1.3 If we cannot address agricultural climate change without reducing food production, it is unlikely that other countries will follow our lead. Even if they do, such an approach risks impacting global food security, as there are many countries that are reliant on food imports to provide adequate nutrition to their people. This would exacerbate short term food security issues, such as those caused by COVID-19 related logistics disruption and Russia's invasion of Ukraine. Long term, it risks destabilising food security as agricultural production is forecasted to be impacted by

changing local climates bringing increased risks of drought, flooding, and changes in weather patterns. Because of this, trade in food will become increasingly important to ensure food supply is maintained and to mitigate against risk.

- 5.1.4 If countries that are net food exporters reduce food production international food prices will rise and contribute to shortages in importing countries. Instead, we should be focussing food production in countries that have comparative and natural advantages in climate friendly food production and seeking to remove and refocus trade distorting practices, such as subsidies and tariffs. New Zealand, with its low intensity, efficient farming systems should be providing a model for other countries to follow.

5.2 Greenhouse gas metrics and GWP*

- 5.2.1 As a leader in sustainable food production and trade, New Zealand needs to be at the forefront of conversations on key agricultural issues, such as how biogenic methane should be treated in international climate policy.
- 5.2.2 New Zealand took a genuinely world leading approach when it legislated for a split gas approach to the emissions reduction targets in the 2019 Climate Change Response (Zero Carbon) Amendment Bill. We have been vindicated in our willingness to adopt the latest science in Chapter 7 of the recent IPCC 6 report and need to promote the same split-gas approach we have adopted domestically in the international arena.
- 5.2.3 New Zealand is almost unique amongst developed nations, in having almost half of its total GHG emission impacts coming from biological methane when the GWP100 metric is used to compare the various GHGs. However, this is an inaccurate representation of the ongoing warming resulting from our agricultural sector.
- 5.2.4 GWP100 works well for comparing nitrous oxide and carbon dioxide, which remain in the atmosphere for 121 and 5-200,000 years respectively. It is very difficult to calculate the exact lifetime of a molecule of carbon dioxide, but it is treated as a long-lived stock gas. Methane however has a half-life of 12 years and the GWP100 value does not accurately take into account its shorter lifetime. This is noted in the IPCC's recent AR6 report:

“The choice of emission metric affects the quantification of net zero GHG emissions and therefore the resulting temperature outcome after net zero emissions are achieved. In general, achieving net zero CO₂ emissions and declining non-CO₂ radiative forcing would be sufficient to prevent additional human-caused warming. Reaching net zero GHG emissions as quantified by GWP-100 typically results in global temperatures that peak and then decline after net zero GHGs emissions are achieved, though this outcome depends on the relative sequencing of mitigation of short-lived and long-lived species. In contrast, reaching net zero GHG emissions when quantified using new emission metrics such as CGTP or GWP* would lead to approximate temperature stabilization (high confidence) {7.6.2}”

“By comparison expressing methane emissions as CO₂ equivalent emissions using GWP-100 overstates the effect of constant methane emissions on global surface temperature by a factor of 3-4 over a 20-year time horizon (Lynch et al., 2020, their Figure 5), while understating the effect of any new methane emission source by a factor of 4-5 over the 20 years following the introduction of the new source (Lynch et al., 2020, their Figure 4).”

- 5.2.5 Acknowledgment in the short comings of the GWP100 metric are not new. The first IPCC Assessment Report, published in 1990, notes:

¹ Allen, Myles R., Vicente R. Barros, John Broome, Wolfgang Cramer, Renate Christ, John A. Church, Leon Clarke et al. "IPCC fifth assessment synthesis report-climate change 2014 synthesis report." (2014). Pp.103

“The Global Warming Potential (GWP) remains a useful concept but its practical utility for many gases depends on adequate quantification of the indirect effects as well as the direct. We now recognize that there is increased uncertainty in the calculation of GWPs²”

- 5.2.6 Given that GWP100 is unfit for purpose to compare the cumulative warming impact of short and long-lived emissions, it is appropriate to either adopt a more fit for purpose metric or to split out the reduction targets for short- and long-lived emissions. An example of alternative approaches that are widely accepted as providing better ways to understand the warming effects of different types of emissions are GWP* and Combined Global Temperature Change Potential (CGTP). Encouraging the global adoption of these approaches would result in agricultural emissions being addressed in a way that is commensurate with their effect on global warming.
- 5.2.7 The IPCC AR6 report supports both the GWP* and CGTP approaches:
- “In summary, new emission metric approaches such as GWP* and CGTP are designed to relate emission changes in short-lived greenhouse gases to emissions of CO₂ as they better account for the different physical behaviours of short and long-lived gases. Through scaling the corresponding cumulative CO₂ equivalent emissions by the TCRE, the GSAT response from emissions over time of an aggregated set of gases can be estimated. **Using either these new approaches, or treating short and long-lived GHG emission pathways separately, can improve the quantification of the contribution of emissions to global warming within a cumulative emission framework, compared to approaches that aggregate emissions of GHGs using standard CO₂ equivalent emission metrics.**”³*
- 5.2.8 The New Zealand Agricultural sector does not support the current methane reduction targets outlined in the New Zealand Climate Change Response Act. We do however strongly support the use of a split-gas approach for setting GHG reduction targets and request that this same approach be taken to emissions budgets internationally. While there is disagreement on what the biogenic methane reduction targets should be, there is broad scientific consensus that short-lived GHG do not need to reach net zero emissions to reach net zero warming.
- 5.2.9 We request that the mandate regarding metrics is strengthened and that New Zealand climate negotiators be empowered to take a leadership position. The issue of metrics should be reframed towards metrics being one part of the broader issue of ‘estimating the warming impact of short-lived GHGs’. Moving away from the widespread use of GWP100 when referring to biogenic methane is an issue larger than transparency, as not doing so risks distorting GHG mitigation pathways by parties to the Paris Agreement.
- 5.2.10 Rather than addressing the inaccuracy of the GWP100 metric in estimating the warming impact of biogenic methane by adopting a more appropriate metric (such as GWP*), in 2019 New Zealand opted to take a split gas approach to targets.
- 5.2.11 The Regulatory Impact Statement (RIS) for the Zero Carbon Bill recognises at page 36 that: “Short-lived gases like biogenic methane (CH₄) which is New Zealand’s dominant GHG, decay relatively rapidly in the atmosphere. It lasts for decades rather than centuries. This means global temperatures can be stabilised (at a given temperature level) without necessarily reducing emissions of these gases to zero⁴.”
- 5.2.12 When discussing how the national targets should be set, the RIS considers how science should inform the final decision. At page 48, the paper states that options which consider a split gas approach “Acknowledges different pathways are appropriate for LLGs (net zero as soon as possible) and SLGs (net zero not required).”

² IPCC, June 1992, Climate Change: The IPCC 1990 and 1992 reports, available at <<https://www.ipcc.ch/report/climate-change-the-ipcc-1990-and-1992-assessments/>> pp.7

³ AR6, Chapter 7, pp. 124

⁴ <https://environment.govt.nz/assets/Publications/regulatory-impact-statement-zero-carbon-bill.pdf>

- 5.2.13 The use of GWP100 for comparing long-lived emissions remains scientific best practice, but problems arise when it is used to estimate the warming of short-lived flow emissions (such as biogenic methane) relative to long-lived stock emissions (such as carbon dioxide).¹¹ A split gas approach is scientifically robust and is supported by the IPCC's AR6 report.
- 5.2.14 The split gas approach is notable in its absence in New Zealand's climate change negotiations mandate. New Zealand's unusual emissions inventory has put the country in a position where it has been forced to confront the issues of accounting for methane using GWP100. These issues were tackled by a decision to legislate for a split gas approach, a creative and genuinely world-leading decision that should be promoted as a template for other countries.
- 5.2.15 **We recommend that New Zealand's split gas approach be promoted at COP28 as a means of assisting other parties to address issues of understanding and accounting for the warming impacts of different gases.** This approach should be taken while also progressing work on promoting more modern metrics (such as CGTP and GWP*).

6. Specific negotiation questions

6.1 Global Stocktake

- 6.1.1 Without pre-empting the result, we expect the Global Stocktake will likely find that not enough is being done to keep global temperature rise under 1.5 degrees and that action needs to be increased, along with commitments that meaningfully transition the world away from fossil fuel use.
- 6.1.2 New Zealand needs to support increased ambition and demonstrate that it is playing its part as a responsible global player by being transparent about our own pathway and how we are going to realistically achieve our targets. New Zealand should also support developing countries by providing financing and technical expertise. In some areas, we are already doing this, such as with our approach to environmentally harmful subsidies, trade liberalisation, and legislation that protects against deforestation. The Zero Carbon Act's split gas approach, the establishment of a non-political Climate Change Commission, and 5-yearly Emissions Reduction Plans are also examples of where New Zealand is taking a world leading approach.
- 6.1.3 However, New Zealand needs to be clear and honest where it is facing challenges, such as in our efforts to reduce emissions of long-lived gases. We need to demonstrate that we are prepared to meaningfully address carbon dioxide emissions, rather than current policy settings which allow emitters to offset emissions through the ETS at the expense of agricultural land rather than making real reductions to emissions.
- 6.1.4 The permanent reduction of food production capability in order to continue burning fossil fuels is unlikely to be seen as a valid pathway by other countries and does not position New Zealand as a leader in tackling climate change. If we want to be seen as a leader, we need to set policies that make real and meaningful reductions to long lived emissions while protecting food producing capabilities.

6.2 Nationally Determined Contributions

- 6.2.1 A good way for New Zealand to take a leadership position would be to set an NDC that outlines how we are going to tackle climate change in a realistic way – this has already been done domestically through our Zero Carbon Act and the setting of split gas targets where it is recognised that short-lived gases do not need to reach zero to not contribute to further warming. In our NDC, we should be clarifying our targets by gas, and by warming effect. This would allow other countries to clearly see the effect that New Zealand's emissions are having on the climate as we aim to keep temperatures under 1.5 degrees. It would set an example that we are open, transparent, and prepared to do our part while demonstrating that we are working to reduce warming across all areas of our economy.

- 6.2.2 The Paris Agreement requires signatories to set NDCs but allows flexibility as to how this is done. In the best case, NDC's are set that cover the entire economy and all GHGs, however this may still lead to uncertainty when they are set in GWP100 as it is unclear what gases will be reduced in order to meet NDC commitments and therefore what the final effect on global warming would be.
- 6.2.3 We know that reductions in short lived emissions at the expense of meaningful cuts to long lived ones will result in temperatures stabilising at a higher temperature, but after a longer timeframe. The Paris Agreement's target to keep temperatures below 2 degrees, while pursuing efforts to limit the increase to 1.5 degrees does not have a timeframe attached to it – the important part is limiting maximum temperature increase which requires net zero long lived emissions while stabilising emissions of short-lived gases.
- 6.2.4 The 2018 IPCC Special Report on 1.5 °C (SR1.5) stated “Reaching and sustaining net-zero global anthropogenic CO2 emissions and declining net non-CO2 radiative forcing (Planetary energy imbalance resulting directly from human-induced changes.) would halt anthropogenic global warming on multi-decadal timescales (high confidence). The maximum temperature reached is then determined by cumulative net global anthropogenic CO2 emissions up to the time of net zero CO2 emissions (high confidence) and the level of non-CO2 radiative forcing in the decades prior to the time that maximum temperatures are reached (medium confidence)”.

6.3 Agriculture

- 6.3.1 Agriculture presents both significant challenges and opportunities for climate change. On one hand it is a significant source of emissions, while on the other it provides substantial opportunities for carbon sequestration. Reducing emissions and increasing sequestration therefore means that agriculture can reduce and reverse global warming.
- 6.3.2 Secondly, global food security is a major challenge with recent events such as COVID-19 related shipping issues and Russia's invasion of Ukraine contributing to a global food system that is already under pressure. Changes in global weather patterns as a result of changing climates will also put pressure on production as droughts and increased incidences of adverse weather events impact farmers across the world.
- 6.3.3 Thirdly, the UN expects global population to increase from around 8 billion today to 9.7 billion by 2050. Growing middle classes in developing countries demand more protein to meet nutritional needs with the FAO concluding recently that meat, milk, and eggs offer crucial sources of nutrients that cannot easily be obtained from plant-based foods⁵.
- 6.3.4 All of the above reasons will require food productions systems that can produce increasing amounts of high-quality food while maximising positive environmental impacts and minimising negative externalities. New Zealand's farm systems are already achieving this and are continuing to improve. Regarding outcomes that we would like to see at COP28, these are:
- Recognition that ruminant agriculture is important for nutrition and can be done in an environmentally sustainable way, producing nutritious food from land and crops that are not able to be used for human consumption.
 - Agreement to reduce agricultural subsidies: Subsidisation leads to perverse outcomes by reducing market signals, impacting trade, encouraging over production, and disadvantaging developing countries who cannot compete with developed countries levels of subsidisation. The increasing number and amount of agricultural subsidies for environmental purposes risks undoing years of subsidy reform reductions resulting from WTO Agreements. The FAO estimated in a recent report that globally, agricultural support accounts for almost USD\$540 billion a year, with this support heavily biased towards “measures that are distorting (thus

⁵ https://www.foodnavigator.com/Article/2023/04/25/meat-eggs-and-milk-play-vital-role-in-meeting-global-nutrition-targets-fao?utm_source=newsletter_daily&utm_medium=email&utm_campaign=25-Apr-2023&cid=DM1071968&bid=97884784

leading to inefficiency), inefficient, unequally distributed and harmful for environmental and human health.”⁶

- Focus should continue on subsidy reduction, following New Zealand’s lead by reducing agricultural support rather than by increasing subsidies for environmental purposes. A framework or agreement should be built outlining what types of green subsidies are permissible to ensure that government support is targeted and achieves tangible outcomes.
- Māori rights and interests in agriculture: Māori have significant interests in the New Zealand sheep and beef sector, with a recent MBIE study finding that 40 percent of people working on sheep and beef farms identify as Māori (and around a similar number in meat processing)⁷. As Treaty of Waitangi settlements are concluded, the amount of land in Māori ownership is likely to increase and with it Māori participation in the sheep and beef industry.
- Beef + Lamb NZ also represent Māori sheep and beef levy payers, who make up a significant proportion of the sheep and beef industry. While frequently the views of all sheep and beef farmers are similar, at times further nuance is needed in order to incorporate views of our Māori farmers.
- Māori want the right to self-determination for their whenua and to be empowered to make decisions that are right for themselves and their whenua. Farming and working on the land is important to many iwi and hapū and provides a way to manage the whenua in a way that incorporates and respects Māori values of kaitiakitanga, mahinga kai, manaakitanga, and whakapapa. A vibrant and prosperous sheep and beef sector provides for this by bringing hapū and iwi together.
- This needs to be supported by having Māori involved throughout the COP process in order to ensure that their rights and interests are advocated in a way aligns with their values. We support early involvement and engagement with Māori at multiple levels (hapū, iwi, and representative organisations for specific sectors, such as Beef + Lamb NZ). For Māori rights and interests to be advocated effectively at COP, this needs to be led by Māori.
- New Zealand should take an approach that encourages other countries to reduce agricultural emissions following our lead, however, should not be prescriptive on the method in which they choose do so. What is more important is that policies and emission reduction targets are implemented that are scientifically rigorous and make meaningful reductions in agricultural emissions. As covered above, there are significant amounts of ‘green’ subsidies that purport to reduce emissions but are unlikely to do so and have additional negative effects, while utilising money that could be used decarbonising other sectors of the economy.
- Unless it can be demonstrated that agricultural emission reductions can be achieved without impacting food security, it will be difficult to encourage other countries to follow New Zealand’s ambition. To lead in this area we need to demonstrate that both emissions reductions and ensuring food production can be achieved. Currently policy settings are not achieving this as pastoral agriculture is being lost to carbon farming, with over 1 million stock units lost to carbon forestry already⁸. This is roughly equivalent to the recommended annual red meat intake of 730,000 people following UN dietary guidelines.
- Targets must be realistic and achievable, using current farm management systems and technologies. Targets that are too high and are not achievable without new technology are no more than taxes on farmers, will impact food production capability, and will reduce the amount of money available for achieving other environmental outcomes. Targets should be set conservatively and reviewed as new technology becomes available.

⁶ <https://www.fao.org/3/cb6683en/cb6683en.pdf>

⁷ <https://www.mbie.govt.nz/dmsdocument/13781-the-emissions-exposure-of-workers-firms-and-regions>

⁸ <https://beeflambnz.com/sites/default/files/news-docs/Orme-summary-report-2022.pdf>

- Recognition of sequestration – agriculture is a valuable carbon sink and with proper land management can sequester significant amounts of carbon in vegetation and soil, while supporting native biodiversity. In order for farmers to commit to these practices accounting of sequestration must be recognised and rewarded.
- We are concerned that internationally less rigorous approaches are being taken to carbon sequestration and there is a proliferation of low-quality carbon sequestration activities that cannot be accurately quantified or verified. This is resulting in our international partners not setting robust targets for reductions of agricultural greenhouse gases and are instead relying on offsetting their emissions with sequestration of questionable value. New Zealand should advocate for a set of principles on the measurement and inclusion of different forms of sequestration that can be used to offset agricultural emissions.
- If soil sequestration is to be used for offsetting agricultural emissions (as is happening overseas) this should be done in a rigorous and scientific manner that also recognises that soil carbon can be lost. An internationally agreed approach to measuring soil carbon sequestration would be helpful for understanding how agricultural practices can be utilised to mitigate loss and/or sequester carbon in soil. This would provide a safeguard against soil carbon credits of questionable value being used in place of reducing emissions.

6.4 Forestry

- 6.4.1 We recognise that while forestry has a part to play in offsetting residual emissions from difficult to decarbonise sectors, this should not be at the expense of meaningful cuts to long lived emissions. New Zealand has not got this balance right, with carbon offsetting by businesses driving increased planting of mono-cultural exotics on productive farmland.
- 6.4.2 While we should argue for a comprehensive set of outcomes in relation to forestry, we need to recognise that our domestic settings are driving perverse outcomes by letting emitters of carbon dioxide offset their emissions rather than reducing them at the expense of food production. It will therefore be difficult to us to make the case that others should follow a set of principles that New Zealand is not implementing domestically.
- 6.4.3 New Zealand can however provide expertise and global leadership on forestry by discussing the lessons learnt from having forestry as a key climate change offsetting strategy and the challenges and benefits of this approach.
- 6.4.4 The outcomes we would like to see are that forestry should be recognised as providing both climate and biodiversity benefits and should be managed in a way that it does so. A key outcome should be preventing any future deforestation and to support tree planting that is suitable for local environments and communities.
- 6.4.5 New Zealand's position at COP28 should be that forestry plays a role in climate change adaption, but this needs to be integrated with current systems in order to provide benefits across a range of areas, such as improving biodiversity, water quality, animal welfare while also sequestration. This requires a detailed approach that is able to recognise a wide range of vegetation for its carbon sequestering ability.
- 6.4.6 B+LNZ does not support expansive monoculture afforestation as an outcome from the operation of the New Zealand Emissions Trading Scheme (NZ ETS). We argue that permanent exotic afforestation through the NZ ETS should not be used by the Government as the dominant method for addressing New Zealand's carbon emissions profile.
- 6.4.7 Rather, B+LNZ argues that tree plantings should be used in such a way as to generate multiple outcomes across community wellbeing and natural capital parameters, in addition to generating carbon offsets, as part of wider options to decarbonise the economy.
- 6.4.8 B+LNZ supports the use of exotic trees, both permanent and in rotation, within an integrated landscapes approach, where land use and land type are matched, and natural resources

utilised within environmental limits. To this end, the operation of NZ ETS should provide protection of the natural environment while allowing for flexible land use, as well as improvements to our natural capital, economic, and social wellbeing over time.

- 6.4.9 Māori rights and interests need to be recognised in relation to their strong connection to the land and forests on land. In NZ, the areas that remain for Māori ownership is limited and not suitable to a variety of land uses. Most of it is very steep and hard to access. Forestry and carbon farming can suit well for these areas, but it is important for the New Zealand government to support the rights and interests of indigenous communities first rather than assume their land can be used as carbon sinks automatically.

6.5 International cooperation on mitigation

- 6.5.1 Regarding environmental integrity and ensuring that only real and additional emissions removals be counted towards NDC's, New Zealand needs to focus on its own domestic approach to emissions reduction and removals. Offsetting emissions through forestry is not best practice and only shifts the problem onto future generations while reducing the food producing capability of our land, our ability to generate export revenue, and impacting rural communities.
- 6.5.2 Internationally, we are also concerned that a vast amount of voluntary carbon sequestration methods and the credits that they create are of low quality and cost and do not result in real and additional emissions reductions. Standardised measuring needs to be developed in order to ensure that companies are not using these low-cost credits to 'offset' rather than making meaningful reductions to emissions.
- 6.5.3 Beef + Lamb NZ has real concerns with New Zealand's approach to accessing sources of overseas reduction units in order to meet our NDC. Like the issue of afforestation on New Zealand's productive farmland, we are now attempting to shift this impact onto other countries instead of making meaningful reductions to our own emissions. As is happening already in New Zealand, this is likely to cause negative economic, social, cultural, and environmental impacts.
- 6.5.4 New Zealand needs to carefully consider how any international emission reduction units would be created and their likely impacts on local communities. There is a significant risk that we are seen by countries in which they are created as a developed country shifting its responsibility to reduce emissions onto a poorer country. This is unlikely to positively impact New Zealand's goal to be seen as a responsible international partner committed to the Paris Agreement.
- 6.5.5 It should also be noted that the Science-Based Targets initiative (SBTi) recommends that long lived emissions should not be offset but should instead be reduced, with any offsetting additional. While SBTi is aimed at companies rather than countries, if this approach was taken at a national level it would require emissions reductions rather than the large scale offsetting which New Zealand's current approach is reliant on⁹.
- 6.5.6 The European Union does not define carbon farming as 'Permanent Storage' meaning that any carbon sequestered could be released back into the atmosphere in the future, undoing any short-term reduction in warming¹⁰. We share these concerns and reiterate that offsetting emissions with forestry should not be seen as a viable alternative to reducing emissions of fossil fuels.
- 6.5.7 When engaging in negotiations to support our access to sources of emissions units New Zealand should be careful to ensure that negative externalities are not created, in terms of social, environmental, and economic impacts on local communities. A set of criteria needs to be created in partnership with the countries selling the units to ensure that this does not happen.

⁹ <https://sciencebasedtargets.org/fags#does-the-sbti-accept-all-approaches-to-reducing-emissions>

¹⁰ https://ec.europa.eu/commission/presscorner/detail/en/qanda_22_7159

- 6.5.8 At the very least, these principles should ensure that food production is not impacted, vulnerable communities are protected, any removals of carbon dioxide are permanent, additional, and effectively accounted for, and co-benefits such as biodiversity are prioritised. Until New Zealand has effectively addressed these issues domestically, there will be significant scepticism from other countries that this can be done in a way that results in positive outcomes.

6.6 Biodiversity and Nature-Based Solutions

- 6.6.1 Regarding nature-based solutions, it is crucial that co-benefits of addressing climate change also positively consider other environmental priorities such as biodiversity. Climate change negatively impacts biodiversity through increased global temperatures resulting in habitat destruction.
- 6.6.2 As covered in our response to this consultation's questions on international cooperation on mitigation, a set of principles should be agreed internationally that outline how climate change should be addressed in a way that delivers co-benefits to biodiversity. Climate change is a key environmental issue, but not the only one that the world is facing and any proposed solutions for reducing global temperature rise must also address these other challenges in a comprehensive and coordinated way. Policies that tackle climate change but further exacerbate current challenges around biodiversity loss, food production and vulnerable communities simply shift problems around. Solutions need to be viewed as part of a wider ecosystem that must deliver benefits across a range of issues.
- 6.6.3 Countries should be encouraged to promote biodiversity benefits and minimise risks and impacts from climate action by linking solutions to multiple objectives and working towards policies that create co-benefits across a range of areas. A set of principles, that encourages countries to adopt policies that are relevant to their domestic situations will be key, as will be linking climate change to other international biodiversity agreements, such as the CBD.
- 6.6.4 This means understanding how different parts of an economy interact and ensuring that climate policy is coherent and achieves additional benefits.
- 6.6.5 For agriculture, such a system must allow farmers to farm in a way that is best suited to their land area and lets them make decisions that are appropriate to their farm system without being overly prescriptive. Any subsidies or government support should encourage whole of farm planning, rather than focussing on issues in silos and distorting market prices. New Zealand has done this successfully in the past and it has resulted in resilient, dynamic, and efficient farmers that match production to seasonal land carrying capacity while incorporating biodiversity into farm systems.
- 6.6.6 We commend the New Zealand government's approach to improving on farm outcomes across a range of areas through farm planning. Compared to increased regulation and subsidisation, this outcomes-focussed approach will deliver improvements across animal welfare, business planning, and sustainability and should be promoted as a model to follow internationally.
- 6.6.7 New Zealand has insights that can be brought to the international climate-biodiversity nexus from a te ao Māori and kaupapa Māori perspective as there are examples that are already in place in New Zealand that could provide models for other countries. Māori agricultural practices are built around Te Taiao and working in partnership to achieve environmental outcomes, with this connecting to aspects to the environment.
- 6.6.8 The Waikato and Waipa River Settlements are examples of this approach working for improved outcomes for freshwater and bring together iwi, government, industry, and stakeholders to protect and improve the mauri of the rivers. Relating to climate and biodiversity, this long-term model of co-governance and shared responsibility should be implemented to address impacts on the climate, plan for adaptation and provide financing. This should also incorporate other objectives such as biodiversity, freshwater, and provide for cultural activities such as mahinga kai.

- 6.6.9 The Te mana o te wai concept as part of the Essential Freshwater is another example of where this is being implemented, with a key aspect the recognition of Māori interests throughout the policy and decision making, while recognising the importance of water for advancing environmental, social, cultural, and economic objectives. This integrated model provides an example for how te ao Māori and kaupapa Māori perspectives should be approached in relation to climate change both here in New Zealand and internationally.
- 6.6.10 A key difference between Māori and Pākehā world views is that Māori view whenua as a person, who is both dangerous and powerful rather than a resource that must be managed. This is a different mindset and recognises that people must adjust behaviour to fit into the world, rather than changing the world to save it. Relating this back to agricultural climate change, this reflects the need to farm in a way that is within land carrying limits and links together environmental objectives such as climate, biodiversity, soil health and freshwater quality.
- 6.6.11 As with our previous submission responses regarding Māori involvement, this needs to be supported by Māori participation throughout the COP process in order to ensure that their rights and interests are advocated for in a way aligns with their values. We support early involvement and engagement with Māori at multiple levels (hapū, iwi, and representative organisations for specific sectors, such as Beef + Lamb NZ). For Māori rights and interests to be advocated effectively at COP, this needs to be done in partnership with Māori.

6.7 Just transition

- 6.7.1 An international just transition towards a low emission future must be equitable and consider all sectors of the global economy. Vulnerable communities must be prioritised and protected while being supported to reduce their warming impact in a way that does not exacerbate current inequalities. Climate change policy must include members of these communities in a way that encourages them to take control of the problem. For agriculture this needs to be through appropriate targets that recognise the warming impact of methane and support farmers to continue food production while increasing efficiency.
- 6.7.2 Sheep and beef farmers at the forefront of climate change and will be disproportionately affected by a transition to a low emissions future, with MBIE finding in their report “The emissions exposure of workers, firms and regions¹¹ that “sheep and beef farmers are ‘highly exposed due to the high emissions nature of the industry.’” We do note however that emissions calculated using GWP100 do not give an accurate calculation of the future warming of the industry where the majority of emissions are methane, especially when emissions are declining and if sensible targets were set for biogenic methane it is likely the impact on farmers would be much less. The report also notes that sheep and beef farming has one of the highest percentages of a workforce who identify as Māori (around 40 percent).
- 6.7.3 Any policies to reduce emissions that do not effectively account for warming will have a significant effect on sheep and beef farmers. It is therefore crucial that sheep and beef farmers are included in any discussions around how a just transition should be implemented. In particular, targets should be set only after careful consultation with farmers and what is possible with current technologies and farm management. They should then be revised as new technology and management approaches are developed.
- 6.7.4 At a global level this means working with agricultural sectors to ensure that warming impact can be reduced while not contributing to global food security challenges. Best practices should be adopted globally, including incorporating biodiversity into farming systems and reducing trade distorting and environmentally harmful subsidies.
- 6.7.5 Current approaches to climate policies are not including farmers proactively and are resulting in confrontation and fear rather than collaborative partnerships. A range of views needs to be

¹¹ <https://www.mbie.govt.nz/dmsdocument/13781-the-emissions-exposure-of-workers-firms-and-regions>

heard and listened to if we are to address the challenges of reducing global warming while protecting food security.

6.8 Response measures

- 6.8.1 New Zealand is currently implementing domestic climate policies that will have negative international impacts in relation to food security. Our current approach of allowing emitters of carbon dioxide to fully offset their emissions through the ETS is driving large scale afforestation of agricultural land is impacting our ability to produce and export food in the time of a global food security crisis. Furthermore, it is not resulting in real reductions to our long lived emissions, shifting the problem onto future generations.
- 6.8.2 New Zealand's approach outlined in our Emissions Reduction Plan to utilise overseas credits to address our failure to make meaningful cuts in our long-lived gas emissions risks shifting this problem onto the nations where we are seeking to purchase these credits from. This risks causing these same problems in those countries.
- 6.8.3 In order to not contribute to these negative impacts there are a few policies that could be implemented:
- 6.8.4 Firstly, New Zealand could set an achievable target for emissions reductions domestically and seek to reduce long lived emissions rather than offsetting them. Instead of spending significant sums of money creating carbon markets in other countries and shifting our problem, we should be utilising the money we would otherwise be spending on purchasing overseas credits to reduce our own emissions.
- 6.8.5 If we are to purchase overseas credits to meet our targets, we should ensure that these credits contribute positively to other international goals, such as biodiversity, and do not cause the same negative externalities that we are seeing in New Zealand where food production is permanently reduced in order to shift the real challenge of reducing emissions onto future generations. We should develop a set of principles in New Zealand that only allows for offsetting in limited circumstances and ensures any offsets are also contributing positively to improved biodiversity outcomes, protect food production capability, and do not negatively impact rural communities. These principles should be the same ones that we should use when assessing whether overseas credits are suitable for us to utilise in offsetting our domestic emissions.
- 6.8.6 If New Zealand wants to be seen as a leader in addressing climate change issues we should not be shifting our responsibility to reduce emissions onto other countries, especially when we already understand the negative impacts on local communities caused by offsetting emissions rather than reducing them.

7. Conclusion

- 7.1 Beef + Lamb NZ supports the New Zealand government taking a leadership role in the COP28 negotiations, however we must acknowledge where we face challenges as well as where we are achieving desired outcomes.
- 7.2 Our farmers are already among the most efficient in the world and are an important part of global agricultural trade, contribute to global food security and provide examples of biodiversity stewardship, world leading animal welfare outcomes, and profitable farm systems. This is all done while receiving the lowest amount of agricultural support in the OECD and exporting to and competing in highly subsidised and protected markets.
- 7.3 Beef + Lamb NZ is keen to be a constructive partner for the New Zealand government at COP28 and on improving outcomes for agriculture worldwide. We would appreciate the opportunity to discuss in person in further detail how we can work to achieve this.
- 7.4 We are keen to see real progress on agriculture at COP28, with a key outcome being the protection of food security while making real progress on reducing agriculture's impact on the climate. New

Zealand is well placed to lead these discussions, with a world leading split gas approach enshrined in our Zero Carbon Act and the He Waka Eke Noa Partnership between government, representatives of iwi/Māori, and industry already resulting in significant progress towards understanding and reducing emissions, with over 95 percent of sheep and beef farmers knowing their emissions number.

7.5 In order for agriculture to play its part in addressing climate change, appropriate targets must be set that accurately understand the warming impact of biogenic methane. New Zealand should take an active leadership position in this area, bringing together a coalition of other countries to promote improved understanding of how biogenic methane should be managed and what targets should be set to ensure no additional warming is added. Global adoption of the GWP* metric is one solution to this challenge and is already consistent with the Paris Agreement, as it utilises the same global warming potentials outlined in the IPCC reports.

7.6 Beef + Lamb NZ works with international partners from a wide range of countries, including from North and South America, Europe, Australia, and Africa through the Global Roundtable for Sustainable Beef (GRSB). We would be happy to coordinate conversations between international partners and their respective governments in order to build consensus on issues relevant to ruminant agriculture. Key partners here could include Australia, Canada, the USA and Latin America.