**THE CLIMATE CHANGE COMMISSION’S DRAFT ADVICE TO GOVERNMENT**

**B+LNZ’S SUBMISSION TEMPLATE FOR FARMERS**

Beef + Lamb New Zealand (B+LNZ) will be making a submission on behalf of the sheep and beef sector, and the Commission is also seeking feedback from farmers and other stakeholders.

This template is designed to help farmers who want to provide their own feedback to the Commission on the six main questions they have asked. We have focused our answers in the template below on those questions. There are topics we haven’t included in the template below such as our desire for the Commission to report on the warming impact of the various greenhouse gases, and our concerns about the 2100 biogenic methane targets.

We have provided some potential text you could use, but feel free to amend.

**Steps for writing your own submission**:

1. Review the First Set of Advice from the Commission.
2. Have a look the factsheet and other information B+LNZ has prepared.
3. Complete the submission form on the Commission’s website or email them.

You can complete a submission either:

1. **Online**: answering the questions provided by the Commission on their website, or
2. **By email:** by ‘submitting a pre-prepared response’ using our template below and emailing to: hello@climatecommission.govt.nz

**What have they said in their report?**

Our factsheet provides more information on this but here are a few key sections in the report that farmers can focus on. This includes:

* the Executive Summary on pages 10-20
* table to reductions per greenhouse gas on page 33
* expected role of forestry on page 48
* insights on methane reductions on page 52
* a larger section on the land-based sectors on pages 65-68
* potential impacts of an emissions transition on the food and fibre sectors pages 88-89 and 98-101
* and policy recommendations relevant to pastoral agriculture on pages 118-123.

Additional evidence on agriculture and emissions offsets (mostly from trees) is also found in Chapters 4c: Reducing emissions – opportunities and challenges across sectors: Agriculture and Chapter 5: Removing Carbon from our Atmosphere.

**What feedback does the Commission want?**

The Commission is looking for both technical and non-technical feedback. **Don’t feel like you have to comment on or be an expert on everything in the report**. Instead you can focus on areas you feel strongly either in support of or want to challenge. It’s important to **highlight why their recommendations are important and how they could impact you**, your farming business, and community.

The Commission has six key questions as well as a request to know your ‘one big issue’ that you want to comment on. They also have another 24 questions that are a bit more targeted to the detail in the report.

You don’t have to answer all of these questions but in your response you should highlight which part of the report or their recommendations you’re providing feedback on, what your position on it is, why, and what you want the Commission to do about it.

You can write your own responses and/or use the guidance in Section C on the six key questions. We’ve outlined our position for each of these questions.

**What makes a good submission?**

If you want to write a submission without using this template, you can use these prompts or statements. **We encourage you to use your own words**. It’s always helpful if you can discuss how some of the proposals would impact you or your farming business.

For example, how do you feel about suggestions you could make further efficiency gains in your business over the next 15 years and reduce your total stocking rate by 10 percent or more? How do you feel about suggestions that you may have ‘marginal’ land on your property and could transition this land into production or native forest? Have you already made efficiency gains or reduced emissions, or retired land or incorporated forestry into your farming business? Are there any tools or advice that would help you to understand your greenhouse gas emissions better? How would you like to be involved when the Commission builds their advice next time?

***You can email this document to:*** *hello@climatecommission.govt.nz*

**Farmer submission template: *Climate Change Commission’s first package of advice to Government***

**Personal information**

*\* indicates required fields*

|  |  |  |  |
| --- | --- | --- | --- |
| Company name:  |  | Address:  |  |
| First name\*:  |  | Region\*:  |  |
| Surname:  |  | Country:  |  |
| Contact person:  |  | Phone:  |  |
|  |  | Email\*:  |  |

**Introduction** *(Keep this section brief. It is not required for your submission, but does help set the scene)*

*[Put information here about your farm and what kinds of steps you have taken to consider or address climate change, eg perhaps you may have planted native or exotic trees. Have you had any experience trying to get native trees recognised by the ETS?]*

**Section A: General responses to the proposals**

*Outline here your high-level feedback on the proposals. Do you support them? Do you have any concerns?*

**Section B: Potential impacts**

*Outline here the potential impacts the proposals could have. What are the practical and financial implications on-farm?*

**Guidance from B+LNZ on the six key questions the Commission is asking**

**Key question 1 – The pace of change:** Do you agree that the pace of change we have proposed would put Aotearoa on a path to meet the 2050 target?

*We/I* don’t agree with the Commission’s plan to reduce biogenic methaneby 16 percent by 2035. These proposed methane cuts are more stringent than the targets set in the Zero Carbon Act for biogenic methane. *We/I* feel that these targets are asking agriculture to do the heavy lifting in relation to reducing short-lived gases to enable a longer timeframe for long-lived gas reductions. These targets mean methane producing sectors are being asked to ‘cool’ the atmosphere in the short-term. It is also asking for efficiency gains and change to occur more quickly within the agricultural sectors compared to others.

The recognition by the Commission that reductions in absolute emissions is appreciated; we cannot plant our way out of this problem. As you highlight, this will require changes across our entire economy as well as an integrated approach at all levels and scales of government. *I am/We are* willing to do our bit but want restrictions put in place on the use of forestry offsetting as well as stronger recognition of the emissions reductions/efficiency gains/ incorporation of woody vegetation already occurring in the sheep and beef sectors to date.

**Key question 2 – Future generations**: Have we struck a fair balance between the action required of the current generation, and the action required of future generations to meet the 2050 target and beyond?

Everyone will need to do their bit to reduce emissions and potentially change how we live and work to adapt to the impacts of climate change.

Farming tends to be an intergenerational venture and *we/I* are very conscious of who has come before us and what we can do to support the next generation.

Farmers are already playing their part to address climate change. We worry that our actions have not been appropriately recognised, nor the impacts on current and future generations identified if agriculture is continually being asked to do more than our fair share. Some of the assumptions made within the report do not reflect the real impact of their recommendations on-farm.

*We are/I* am concerned around the lack of analysis on the distributional impacts across our communities and the beef and sheep sectors.

Sheep and beef farmers are being asked to both reduce their emissions as well as provide land for carbon offsetting for other sectors. This does not recognise the emissions reductions and efficiencies already made on sheep and beef farms or the substantial value of existing vegetation on sheep and beef properties.

The assumption that planting ‘marginal land’ would not impact on GDP is forgetting the impact that this planting will have on local communities, especially in areas with limited access. In many farming businesses, this ‘marginal’ land has a specific purpose within the farming operation. Planting this land will likely require a shift in the way *I run my/we run our* business. At larger scales, planting this land could reduce the resilience of the farming operation and communities to manage the effects of climate change, including drought and severe weather events.

The recommendation in the report to plant ‘marginal land’ is asking this generation of sheep and beef farmers to help the next generation of fossil fuel-reliant companies and communities have even more time to change their ways. Current policy settings favour exotic forests which only provide a short-term carbon sink, and will come at a cost to this generation to support the next.

**Key question 3 – Our contribution:**Do you agree with the changes we have proposed to make the NDC more likely to be compatible with the 1.5°C goal?

New Zealand’s food producers are some of the most efficient and productive in the world. This needs to be recognised in our international targets, and is in line with the Paris Agreement’s aim to reduce our emissions and adapt to climate change in a way that does not threaten food production.

*I/We* recommend that the NDC is changed to incorporate a split-gas approach that recognises the alternative warming contributions of different greenhouse gases.

**Key question 4 – Role and types of forests:**Do you agree with our approach to meet the 2050 target that prioritises growing new native forests to provide a long term store of carbon, and limits the amount of new exotic forestry needed to meet the 2050 target**?**

*I/We* appreciate the focus on native forest planting to achieve multiple objectives. Native forests on sheep and beef properties already provide significant areas of biodiversity, erosion control, seed sources, and recreational enjoyment. They are a wealth of ecosystem services and a valuable part of our farming operations. *I/we* seek that indigenous habitats/forestry areas already provided for within our farms are recognised and this integrated landscape approach is incentivised, rather than wholescale land conversion that will come at a cost for current and future generations.

We would encourage a strong limit to be put in place on the use of exotic forestry offsets, so that true emissions cuts are made and the most co-benefits are realised.

**Key question 5 – Policy priorities to reduce emissions:**What are the most urgent policy actions needed to help meet our emissions budgets?

*Our top five:*

1. Develop carbon monitoring systems to track and reward woody vegetation and soil carbon stock within the farm, including smaller areas than what is recognised in the ETS.
2. Place a limit on the amount of exotic forestry offsets able to be utilised to meet our emission reduction targets.
3. Integrate climate, freshwater, and biodiversity targets and implementation to ensure streamlined, efficient, and effective implementation.
4. Provide support for extension services or grants that focus on integrating trees, especially natives that provide a range of ecosystem services, into the farming landscape, rather than wholescale conversion.
5. Support rural broadband initiative to ensure that farmers have access to the most up-to-date tools and technology to support their business decisions.

There are a number of recommendations made for policymakers to take on board. It’s really important that the Commission’s recommendations are grounded and reflect what real people need.

**Key question 6 – Technology and behaviour change:**Do you think our proposed emissions budgets and path to 2035 are both ambitious and achievable considering the potential for future behaviour and technology changes in the next 15 years?

An equitable, inclusive and well-planned transition is key to our success. *I/We* think the reliance on the continued efficiency gains within our sectors fails to recognise or reward the gains we have already made/will be a hard bar to meet, and will not be achievable on all sheep and beef farms.

Additionally, the utilisation of low emissions sheep is a great way for some farmers to reduce their on-farm emissions. However, the other breeding traits that a farmer would be seeking may need to be set against this new metric. This could impact on the overall productivity and production of the business, and on animal welfare.

We will need to continue to invest in research into technologies that can sustainably manage emissions on-farm, including recognising the impacts and nuances of rolling out these new technologies.

**Additional consultation questions**

There are an additional 24 questions outlined in the Climate Change Commission’s draft advice report. If you want to answer these questions you could refer to B+LNZ’s factsheet.

**CONCLUSION**

[*Final or summarising comments*]

Thank you again for the opportunity to comment on the proposed changes. *I/We* welcome the opportunity to further discuss any of the points above with the Climate Change Commission if you require more information.

For any enquiries relating to this feedback please contact [*name of person who will deal with any enquiries*]on [n*umber, email address etc*].

Yours faithfully,

*[Signature]*

*[Name]*

*[Date]*