

18 September 2018

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Dr Wendy Craik
The Chair
Climate Change Authority
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Via Email: submissions@climatechangeauthority.gov.au

Dear Wendy

Submission to review of the National Greenhouse and Energy Reporting legislation

Australian Pork Limited (APL) welcomes the opportunity to make a submission to the review of the operation of the National Greenhouse and Energy Reporting (NGER) legislation. APL congratulates the Climate Change Authority (the Authority) for undertaking this important review. APL believes it is important to ensure the legislation is achieving its objectives, without placing unnecessary burden or posing privacy risk on businesses.

APL is the peak, national representative body for Australian pork producers. APL is a producer-owned, not-for-profit organisation supporting and promoting the Australian pork industry through the delivery of marketing, export development, research and innovation and policy initiatives, to secure a profitable and sustainable future for the Australian pork industry. APL is funded primarily through statutory pig slaughter levies collected under the *Primary Industries (Excise) Levies Act 1999*, with matching research funds provided by the Australian Government for eligible R&D projects. The pork industry employs more than 36,000 people in Australia and contributes \$5.2 billion in gross domestic product to the Australian economy.

APL has taken this opportunity to provide information and recommendations to the Authority, covering administrative burden and cost, consolidation and standardisation of emissions reporting, and the very real privacy concerns APL has with the public listing of business contact and location information, on emissions reporting databases.

The Australian pork industry is a low emitter of greenhouse gasses and seeks to reduce emissions through research and innovation and uptake of emissions abatement technology such as biogas systems on farm. To APL's knowledge, only one pork producer (the company) meets the corporate threshold for reporting emissions through the NGER scheme. This company is a vertically integrated pork production and processing company that reaches the threshold due to emissions from the pork abattoir, processing and feed milling parts of the business. The company is also required to report to the National Pollutant Inventory (NPI) and the National Greenhouse Gas Inventory (NGGI).

I. Administrative Burden and Cost

The Australian pork industry is already heavily weighed down under various state, local and federal legislation, regulatory requirements and associated fees.

Considering this, APL is concerned about the regulatory overlap and the administrative burden and cost associated with reporting to the NGER scheme, in conjunction with similar

emissions reporting schemes. It takes a staff member at the company at least two days each month to extract and collate the information from energy bills necessary to calculate and report its electricity emissions to comply with the NGER requirements. Staff must also track fuel use across the company and calculate emissions from effluent ponds. It is estimated that a minimum of five days administrative effort per month is required to appropriately consolidate and report company data to the NGER.

2. Reporting Methodology

APL has concerns that the three different NGER estimation methods from which reporters can choose produce very different results. Feedback received indicates that the most simple, practical, and least administratively heavy estimation method is the least accurate and it appears that this technique significantly overestimates emissions. While the alternate estimation methods are more accurate, they are too onerous and/or require costly equipment. This situation would become a bigger concern if, for example, an emissions trading scheme came into play in the future because over estimation would have significant financial impacts on businesses.

Considering this, APL believes NGER estimation methods need to be reviewed to improve the accuracy and efficiency of all methods available. Moreover, efforts should be made to standardise the estimation methods used across all Australian government emissions reporting schemes so that they deliver results that are consistent, and as a result, reduce administrative burden.

3. Streamlining Emissions Reporting

APL notes there are significant opportunities to gain efficiencies (that would benefit government's throughout Australia and industry) by consolidating emissions reporting under a single national scheme. It is cumbersome that one business should be required to report emissions to multiple inventories, using different estimation methodologies. Not only does this impose unnecessary administrative burden and cost on business, it also creates confusion for users of the data who rely on it to inform policy or business decisions.

APL urges the government to take this opportunity to look at options for standardising and consolidating the NGER, NPI, NGGI, and other reporting schemes. The time and money saved via these efficiencies could be better spent by businesses and government on schemes and technologies that reduce emissions.

4. Privacy

A very important issue that needs addressing in all the emissions reporting schemes is privacy, especially considering the suggestion that emissions reporting schemes could be standardised. APL has repeatedly raised concerns with Government that private information about businesses is being made public on the NPI website and to a lesser extent via the NGER and NGGI reporting schemes. APL views this as an unnecessary breach of privacy, that has had negative impacts on individual pork producers and on the entire pork industry over the last decade.

APL is concerned that information from the NPI has been used to locate pig farms for trespass and other activities, completely unrelated to emissions. Of the three reporting schemes mentioned above related to emissions, the NPI is the most invasive when it comes to publicly disclosing information about business facilities.

Around 66 pork production facilities are required to report to the NPI. APL has made numerous requests over the past decade regarding the perverse impact releasing individual contact details of pork producers has had on individual producers and the industry. These requests have resulted in no changes. In no other situation can governments or industry release private information that would identify individuals due to Australian privacy legislation – and the interests and rights of individuals has been waived in favour of the public to know where these facilities are located. Moreover, APL recently made a

submission to the review of the NPI¹ and we encourage the Authority to refer to this submission to gain a greater understanding of our concerns around the current NPI framework.

APL would like to stress that if streamlining of emissions reporting systems is considered, the approach to data publication used under the NPI should not be the model adopted. The NPI website lists details including physical addresses and phone numbers of reporting entities online and goes so far as to include a live map showing locations of pork production facilities.

Publishing the location of pork production sites leaves producers vulnerable to trespass and other associated (and usually illegal) behaviour from activist groups. Trespassers pose a significant biosecurity and animal welfare risk to pork production facilities. It is understood that these types of actions have resulted in endemic diseases entering facilities, production losses (e.g. through abortions or still births), livestock fatalities, destruction of infrastructure, and animal welfare impacts.


APL challenges the Government's policy justification for publicly listing organisations' contact and location information. APL notes that organisations should be able to comply with emissions reporting requirements without having to compromise the privacy, security and commercial confidentiality in the process. APL strongly urges the Government to find a way to meet its emissions reporting policy objectives without compromising the security and privacy of pork producers and other businesses.

In Summary

APL thanks the Climate Change Authority for the opportunity to make a submission to the review of the National Greenhouse and Energy Reporting legislation, on behalf of the Australian pork industry. APL hopes this feedback will be considered positively for improving and streamlining emissions reporting, reducing regulatory burden, cost and overlap and encouraging emissions reductions across Australia's industries. Most importantly, APL hopes the Authority will take our concerns about privacy seriously and use this opportunity to consider amending the legislation to allow reporting entities to keep their location and contact information private.

APL would be happy to discuss the comments provided in this submission. If 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



Deb Kerr
General Manager Policy

¹ APL, 'Submission to the Review of the National Pollutant Inventory Discussion Paper', August 2018, <http://australianpork.com.au/wp-content/uploads/2013/11/APL_Submission-to-the-National-Pollutant-Inventory_Discussion-Paper_07082018-FINAL.pdf>