

NORTHERN TERRITORY CATTLEMEN'S ASSOCIATION INC.

Advancing and protecting the interests of cattle producers in the Northern Territory

Member - National Farmers' Federation & Cattle Council of Australia

Northern Territory Department of Environment, Parks and Water Security Level 1, Goyder Centre 25 Chung Wah Terrace Palmerston NT 0830 environment.policy@nt.gov.au.

Monday 22nd February 2021

Dear Sir/Madam,

Re: Greenhouse Gas Emissions Management for New and Expanding Large Emitters – Draft for Consultation

The Northern Territory Cattlemen's Association (NTCA) is the peak primary industry body in the Northern Territory. The NTCA has a mandate to advance and protect the interests of the cattle producers in the NT, and the NTCA's members and associate members of the NTCA are truly diverse in terms of location and size, ranging from small family businesses to aboriginal enterprises, and large corporate entities.

The NTCA thanks the Northern Territory Government for the opportunity to provide comment on the Greenhouse Gas Emissions Management for New and Expanding Large Emitters draft policy.

The NTCA supports the Northern Territory Government's initiative target of net zero emissions by 2050 whilst supporting economic growth and industry development.

We would like to highlight that the Australian red meat and livestock industry itself has set an ambitious target to be Carbon Neutral by 2030 (CN30). As an industry, we are proactively addressing emissions and taking action to improve long-term productivity. The Northern Territory pastoral industry will be a key player in delivering CN30.

With regard to the draft policy document, we make the following comments;

- The NTCA would like clarification that what is deemed "levels as low as reasonably practical" (Ref. Introduction Page 4) gives consideration to *all* stakeholders and proposed land use activities, including the clearing of land for activities for which abatement could exceed emissions;
 - o Improved pasture
 - o Fodder crops (stand/graze or cut/carry)
 - Broadacre cropping (cereal and fibre crops)
- The NTCA holds concern and requires certainty that projects involving the activities outlined above will not be disadvantaged in calculating abatement, as the FullCAM system lacks configuration data for agricultural pasture and crop species specific to the Northern Territory.

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- The NTCA requests that seasonal variability, drought and fire be included as considerations by the Minister in the approval process, as they could have significant effect on the emissions of any project.
- The NTCA seeks confirmation from the Department that Northern Territory pastoralists will have access to accurate, region specific accounting tools and sufficient support to use them in the development of a Greenhouse Gas Abatement Plan.

The Northern Territory pastoral industry's ability to attract investment by unlocking development potential on pastoral land should be supported as a key means of growing the NT economy to \$40 billion by 2030.

We look forward to continuing to work with the Northern Territory Government and pastoralists to facilitate successful and sustainable development and would welcome the opportunity to provide comment on policy development in this space.

Yours sincerely,

Romy Carey Acting CEO

NT Cattlemen's Association