

2025 consultation

Submission type	Upload
Submitter	Australian Chicken Meat Federation
Response ID	277501

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11 July 2025

NSW Net Zero Commission
4 Parramatta Sq
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Parramatta
NSW 2105



Via email: contact@netzerocommission.nsw.gov.au

Dear Secretariat,

SUBJECT: NSW Net Zero Commission Workplan

The Australian Chicken Meat Federation (ACMF) welcomes the opportunity to respond to the Net Zero Commission's call for submissions. As the peak industry body representing the chicken meat industry in Australia, we are deeply committed to supporting a low emission sector.

The Australian chicken meat industry boasts the smallest environmental footprint among animal proteins produced in Australia. With feed accounting for approximately 77–79% of the industry's total emissions, consistent year-on-year improvements in feed conversion efficiency highlight the industry's strong commitment to sustainability by significantly reducing its indirect environmental impact.

Ultimately, our industry recognises the critical importance of addressing climate change and the vulnerabilities it poses to the Australian community, particularly as a core stakeholder in food security and public health.

With chicken consumption rates and the population of New South Wales increasing annually, enhancing the state's adaptability is key for mitigating climate-related challenges and ensuring the continuity of the supply chain.

We look forward to collaborating with the Net Zero Commission on initiatives that support our ongoing environmental stewardship, including our mitigation and adaption capability.

Regards,

Verity Price

Deputy Chief Executive Officer

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ABOUT THE ACMF AND THE AUSTRALIAN POULTRY INDUSTRY

The Australian Chicken Meat Federation (ACMF) is the peak coordinating body representing all key players in Australia's chicken meat industry. It serves as the voice of the industry at the national level, advocating on behalf of chicken growers, integrated producers, and other industry participants. The ACMF plays a central role in shaping industry policy, fostering best practices, and liaising with government, regulators, and stakeholders on a wide range of issues, including biosecurity, animal welfare, environmental sustainability, and food safety.

The chicken meat industry is a significant contributor to Australia's economy. In the 2024-25 financial year, the gross value of production (GVP) is projected to reach \$3.8 billion, reflecting the industry's growth trajectory and increasing domestic demand for poultry products. The sector supports the employment of more than 58,000 full-time equivalent workers, many of whom are located in regional and rural areas, where the industry provides essential economic stability and job opportunities. These roles span across chicken farming, processing facilities, logistics, feed production, and allied services, underpinning a complex, integrated supply chain.

Chicken meat remains the most popular source of animal protein for Australian households, surpassing all other meat varieties. Annual per capita consumption now exceeds 50kg and continues to grow, underscoring the widespread preference for chicken as a dietary staple. This far exceeds other meats, such as pork, which ranks second with a per capita consumption of 28kg per annum. 68 per cent of Australians eat chicken meat as part of a meal at least twice a week because of its affordability, popularity with the entire household, versatility, and taste.

The Australian chicken meat industry is widely recognised for having the lowest environmental footprint among all land-based animal protein sources. Chickens convert feed to meat with unparalleled efficiency compared to other livestock, requiring significantly less grain, water, and land to produce the same amount of protein. This high level of efficiency helps reduce the overall demand on natural resources.

Chicken meat plays a pivotal role in Australia's food security by offering a reliable, affordable, and sustainable source of protein. With a growing population, food affordability and accessibility remain crucial challenges. The high production efficiency of the chicken meat industry ensures a stable supply, helping to keep retail prices competitive and protein-rich foods accessible to all Australians.

Question 1: What can you tell us about your experience of the impacts of climate change and how can the commission seek to reflect and respond to this in its work?

Enhanced Biosecurity Risk Profile

Australia has historically maintained its H5N1-free status due to geographical isolation and robust biosecurity measures. However, climate change is increasing the nation's biosecurity risk by altering the migratory patterns of wild birds. Traditionally, wild birds followed distinct global flyways during migratory seasons, introducing heightened risk to countries within their paths. As climate variations significantly affect their migratory patterns, wild birds are now changing their flight paths, posing a greater threat of virus introduction to Australia's northern and southern states.

These altered flight patterns are particularly concerning as highly virulent diseases, like the Highly Pathogenic Avian Influenza variant H5N1, can cause severe devastation to poultry production industries and ecosystems globally. Figure 1 below illustrates these migratory flyways and the associated disease introduction threats.

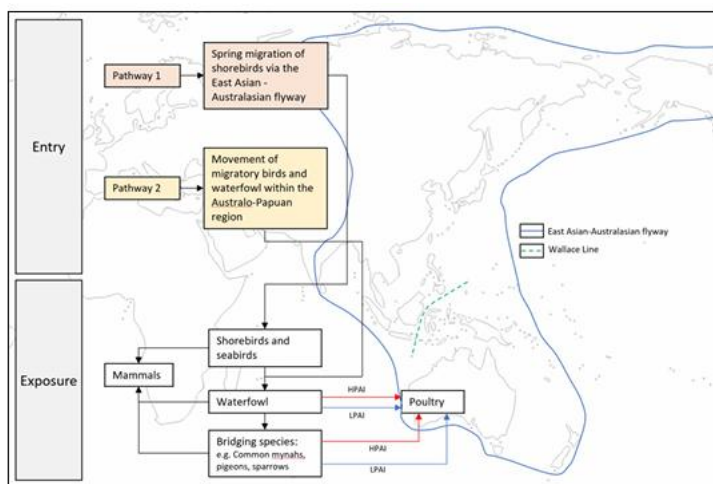


Figure 1: HPAI Exposure Pathways: Wildlife Health Australia (2022)

As the only continent free from this devastating virus, Australia must strengthen its response and preparedness capacity to mitigate these biosecurity risks exacerbated by climate change. It is important that the Commission considers the broader impacts of climate change when developing their work plan and how they can work with other Departments, and organisations to champion mitigation and adaption efforts where possible to support our favourable biosecurity status.

Supply Chain Disruptions

Climate change significantly impacts poultry supply chains, particularly through natural disasters and the disruption it poses to supply routes, introducing cascading effects throughout the production chain. As the Commission is aware, the increased frequency of natural disasters has posed significant disruption to freight routes through damage roads, railways, and ports, leading to delays and increased transportation costs. This impact upon 'just in time' industries, including the chicken meat industry, often translates to significant delays in product delivery, potentially rendering product unviable and impacting relationships with primary buyers and customers. Ultimately, these impacts are felt at levels of the supply chain, with product accessibility impacting consumer choice and food security, and the producer facing impacts on their bottom line with flow on effects to the broader Australian economy.

The discussed impacts do not account for recovery costs and their prolonged effects on supply chain efficiency. Regional and low-income communities are particularly vulnerable to price volatility and product shortages. Chicken meat, being the most affordable and widely consumed lean animal protein, often lacks suitable alternatives that meet dietary and cost needs for the average Australian consumer.

Considering these cascading social and economic impacts, the Net Zero commission must adopt a holistic view of climate change challenges, recognising their interconnectedness with food security, biosecurity, and community health.

Rising Cost of Business

While the poultry industry itself is a non-seasonal industry, climate variability has a compounding impact on the horticulture industry both domestically and internationally, affecting the cost of grains used for feed within our sector. Extreme weather conditions, such as droughts and floods, can severely impact crop yields, leading to shortages of feed and subsequent price increases.

Higher feed costs can lead to increased production expenses, placing pressure on industry to rise prices to recoup costs. These factors threaten the stability and efficiency of the poultry supply chain, necessitating adaptive strategies to mitigate the impacts of climate change.

Although these issues may not be directly connected to the work of the Net Zero commission, it is important that regulatory authorities understand the challenges and barriers faced by livestock production industries that are caused by the environmental and operational challenges caused by a changing climate.

Question 5: What additional information and evidence should the commission consider when assessing progress towards NSW's targets for reducing net greenhouse gas emissions?

The commission should consider current regulatory requirements at both State and Federal levels to support pathways net zero in order to prevent duplication of efforts. There is currently a considerable amount of reporting requirements placed upon industry, with emerging efforts to collect and synthesise farm emissions and sustainability data among larger enterprises. It is also important to acknowledge industry-led and supported efforts to track and report on environmental and social governance (ESG) outcomes including matters related to emissions reduction and net zero. Exploring ways to further support these current efforts and integrate preexisting data sets would allow the Commission to assess progress towards NSW targets more efficiently with the endorsement of industry.

The Commission must also balance targets with incentives and grant opportunities directed towards the agricultural sector so they can invest in adaptation and emissions reduction strategies to viably meet these outcomes.

As forementioned, the Net Zero Commission needs to consider the operating environment of industries within scope of these targets, and the plethora of ESG priorities and challenges placed upon industry relating to matters that are not limited to sustainability – e.g. animal welfare, biosecurity, food security and affordability, urban encroachment and land use conflicts, workforce shortages etc.

Assessing regulatory impacts and collaborating with industry to both develop and bring about the action items of the Commission's workplan is crucial to avoid unintended consequences on the state's agricultural and industrial landscape.

A primary example is the ongoing need for reliable and affordable energy among the state's food industries. For the poultry sector in particular, reliable energy sources not only support the production of food but are also needed to safeguard animal welfare through ensuring optimal shed conditions, and to appropriately store product to ensure food safety. Gas in particular is a commonly utilised energy source to heat broiler sheds, and generate thermal processes such as scalding in poultry processing operations. Its conventional use within essential industries is especially important to consider when regulations banning new gas connections are being introduced in neighbouring states, such as Victoria, and are being proposed nation-wide. This policy movement is particularly concerning for expanding agribusinesses looking to introduce new sites but are confronted with the lack of viable and affordable energy alternatives to support this phase out. Although there is no evidence of a firm commitment to introduce gas bans of this nature in NSW, we reiterate that for the commercial sector, such intervention can disrupt the operational capacity within core junctures of our supply chain.

Ultimately, the Commission's workplan success will depend upon them adopting a supportive approach to NSW's industrial and agricultural policy settings, to ensure new sites are not disadvantaged by laws affecting the viability of core operations through restricting the use of reliable and affordable energy sources.

Sweeping changes through unreliable or costly energy mandates can have cascading impacts on animal welfare, food security, affordability, and food safety. Again, such considerations will be crucial for the Net Zero commission when developing their body of work but also to abide by the Commission's guiding principles of considering the impact of their work on local employment and industries, consumer costs (including energy costs) as well as equity and social justice impacts.

Question 10: What specific actions or policies could increase uptake of emissions reduction strategies in agriculture, both in the short and long term?

The Net Zero Commission must investigate the factors and barriers preventing commodities from participating in carbon credit programs. Establishing targeted sector-specific programs to simplify integration of carbon capture technologies and providing education and training for producers on how to engage with the carbon credit system will be highly material in increasing uptake of these programs.

While we acknowledge the grants and subsidies provided by the NSW Government to producers, it is important to note that these financial supports are primarily aimed at small and medium enterprises, rather than larger integrated businesses. The industry already makes substantial investments in sustainable energy use, production capacity upgrades, welfare, and environmental stewardship. Therefore, government investment should reflect the investment needs of these larger businesses to support their widespread engagement with these programs.

Additionally, the state government should introduce targeted investment programs to support research and development (R&D) in emissions reduction within agriculture. While R&D levies are a valuable contribution to the innovation ecosystem, additional investment is needed to drive outcomes that offer sector-wide benefits.

Ultimately, the Commission's workplan should be guided by strategies that enhance incentives for participation in decarbonisation activities, rather than relying on enforcement measures. It is imperative that the Commission's agenda includes considerations of our sovereign production capabilities, food security, and community health to ensure the preservation of commercially viable food systems.

Please do not hesitate to contact our Policy Officer [REDACTED] if you have any questions or would like to discuss our response further.

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