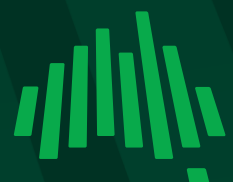


National  
Farmers  
Federation

# Nature Repair (Replanting Native Forest and Woodland Ecosystems) Methodology Determination 2024

November 2024



## The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

### NFF Member Organisations



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04 November 2024

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**RE: Nature Repair (Replanting Native Forest and Woodland Ecosystems) Methodology Determination 2024**

## Executive Summary

Dear Sir / Madam,

The National Farmers' Federation (NFF) welcomes the opportunity to provide feedback on the proposed Replanting Native Forest and Woodland Ecosystems methodology developed by the Nature Repair Committee. This is the first detailed outline of a proposed methodology for assessment and inclusion under the Nature Repair Market which is anticipated to commence formally next year in 2025.

The Nature Repair Market is a Federal Government initiative to incentivise action to protect the environment and encourage land management practices that deliver improved biodiversity outcomes. The scheme establishes a national, voluntary marketplace whereby individuals and organisations are provided opportunities to undertake Nature Repair projects to generate a tradable certificate.

As key stakeholders, participation of the agricultural sector will play a central and critical role in ensuring the success of this initiative. The NFF supports the Government's vision for market-driven solutions to enhance biodiversity while recognising the need to ensure practical implementation, regulatory clarity, and financial sustainability for agricultural participants. **The NFF reiterates our position that the Nature Repair Market is accessible and developed in a manner that maximises participation for landholders across the agriculture sector – a result achieved through the development and accreditation of a broad number of outcome-driven methodologies supported by appropriate administrative requirements.** This approach will support metrics outlined in the Federal Government endorsed NFF 2030 Roadmap including that the *"net benefit for ecosystem services is equal to 5% of on-farm revenue"* can be met<sup>1</sup>. In recognition that more options are a positive outcome for landholders, the NFF expresses our in-principle support for the development of a methodology for the replanting of native forest and woodland ecosystems.

**This proposed methodology falls far short of Government's intended vision and aspiration of a Nature Repair Market. This methodology appears to be more about process and appearance than delivering environmental outcomes. Perfection should not be the enemy**

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<sup>1</sup> National Farmers' Federation: [2030 Roadmap: Australian Agriculture's Plan for a \\$100 Billion Industry](#)

**of the good. There are several instances where significant improvements can be made across all methodology sections to incentivise voluntary participation and reduce the administrative burden to landholders. Our comments are articulated in the proceeding pages of this submission.**

Separately, we also note that as stated in the Ecological Knowledge System (EKS) Technical Summary Report for public consultation, “for market opening in 2025, the EKS will be focused on providing ecosystem information and functions that support the market’s first method” and “updated as needed to support additional methods”. This statement indicates that the Nature Repair Market will commence with only one accessible methodology. This has clearly fallen short of the aspiration, and we urge the Government to appropriately resource this process to avoid further delays. NFF seek a minimum funding commitment of \$2 billion over four years to support implementation of Nature Repair methodologies in the next Federal Budget.

## Project Eligibility Requirements

NFF acknowledges the requirement that biodiversity projects registered under this methodology are required to undertake plantings of native species to the local area in question, consistent with appropriate Reference Ecosystems. It is critical that Reference Ecosystems are accurate.

The proposed methodology is intended to apply to projects that enhance biodiversity in native species by replanting native forest and woodland ecosystems in intensive-use landscapes. **The methodology requires the project area to be wholly located with the specified sub-regions defined by the Interim Biogeographic Regionalisation for Australia (IBRA) landscape classification framework that reflect “intensive-use landscapes that have historically experienced widespread clearing and thinning of native vegetation”.** This approach is very subjective and questionable. A list of the specific sub-regions defined by the IBRA Framework that the Nature Repair Committee has classified as being “intensive-use landscapes” including an explanatory rationale/methodology to support such a classification is not provided. The language here is not helpful, in an agricultural context ‘intensive’ means something quite different and puts a focus on highly developed cropping such as irrigation or horticulture. This language is also contested and often associated with regrowth management conducted by the sector by several single-issue environmental-leaning Non-Government Organisations which is very concerning to NFF. **This information must be provided upfront.** It is simply not possible to decipher the specific sub-regions that have been classified in such a manner, NFF understand that over 400 sub-regions have been delineated in IBRA Version 7.0. **It is also important to recognise that not all specified sub-regions reflect intensive-use landscapes. There exists much variability across the terrestrial landscape and applying a broad category at a sub-regional scale cannot be viewed as an appropriate approach.**

As a result of this criteria, eligible regions (Figure 1 below) have been constrained. NFF understands that restricting eligibility to sub-regions that reflect intensive-use landscapes that have historically experienced widespread clearing and thinning of native vegetation ensures activities are generating the most ‘Nature Repair’ outcomes as possible. The sub-regional approach should be used in a manner whereby areas of arability and sufficient rainfall are marked as eligible as they support long-term plantation establishment and viability. While the NFF supports the outcome of achieving a ‘Nature Repair’ objective, this must not infringe upon opportunities for landholder participation at the national level. A

balance must be struck between these two dynamics, and it is our view this has not been reached. As a practice of best principle, each methodology developed under the Nature Repair Market should be designed in a manner that provides opportunity to landholders in all States and Territories to participate. To this extent, the eligible Region Map below must be expanded substantially to include additional areas, particularly in the Northern regions. These criteria coupled with the high 90% threshold requirement as defined under “comprehensively cleared” erect barriers to participation, particularly for small producers and farming families – and put into question the economic viability of this methodology. This does not take into consideration that existing carbon prices are extremely low, there is no established market price for biodiversity, and the requirement for a prospective proponent to engage a reasonable suitably qualified individual to conduct the following steps in addition to steps undertaken themselves resembles a significant administrative and cost burden (i.e., transect data sampling, disturbance and land-use history upward of ten-years through a variety of methods including remote imagery, natural regeneration assessment):

- *Initial Site Assessment.*
- *Assignment of Reference Ecosystems.*
- *Determination of ecological condition state (i.e., benchmarking).*
- *Initial Site Assessment Report.*
- *Transect monitoring.*
- *Monitoring Report.*



**Figure 1:** *Eligible regions for the proposed Replanting Native Forest and Woodland Ecosystems methodology.*

The NFF supports the requirement that the combined Activity Areas encompass an area/s with a combined area of at least 5 hectares mapped in accordance with the Mapping Guidelines. This threshold will provide more flexibility for discrete projects across a landscape and ensure that landholders who seek market participation but have limited access to funding, available productive land, or are more risk adverse are provided an opportunity to participate if desired. The ability for Activity Areas to consist of a single contiguous area or multiple individually disconnected area parts is also supported.

NFF also note that rules made to empower the Clean Energy Regulator (CER) to vary the registration requirement of a biodiversity project only apply to projects on applicant from a proponent, and not an existing project's registration.

## Additionality

As stated very clearly in the proposed methodology: *“project activities implemented under this method must deliver a biodiversity outcome that would be unlikely to occur if the project was not carried out”*.

**The NFF maintains our position that existing biodiversity activity and projects must be recognised and included in the Nature Repair Market as this ensures fairness in participation while incentivising further project work.** We understand that this very question was openly raised in a recent September public consultation on proposed Nature Repair Market rules. Further, as stated in the *Nature Repair Act 2023* Explanatory Memorandum: ***“it is expected that the interpretation of this [biodiversity integrity] standard would vary depending on the nature of the methodology”***. **These conditions reflect that an additionality requirement is not strictly required under legislation, and we seek justification as to why the Committee has included this requirement despite indicating otherwise.**

The task for CO<sub>2</sub> is to reduce its presence in the atmosphere and international accords require additionality to apply. No such test or rationale applies within the scope of biodiversity. Provisions outlined under the Environment Protection and Biodiversity Conservation Act 1999 (*“maintain or improve”*) and Nature Repair Act (*“enhance or protect”*) both recognise the inherent value in existing habitat and biodiversity presence. We therefore maintain our position that it is inconsistent to require methodologies that only address additional attributes.

## Managing Risks: Achieving Biodiversity Outcomes and Restrictions to Agricultural Production

The NFF are significantly concerned about the lack of protection for productive land under current policy frameworks. For example, if a farmer plants new vegetation adjacent to their productive land and applies for credits through the Nature Repair Market, this vegetation can enhance biodiversity and support endangered species, generating a credit. However, when the farmer later seeks to harvest crops on adjacent productive land, they may encounter restrictions due to existing State or Federal biodiversity legislative requirements.

While the Federal Government encourages landholders to participate in the Nature Repair Market to boost biodiversity, the success of these efforts may inadvertently trigger other legislation that imposes lengthy application processes (and significant fees) before harvesting can occur, potentially even requiring the farmer to forgo production on that land to protect certain species. This issue is particularly pressing for farmers with private native forestry adjacent to new vegetation, as harvesting in these areas may no longer be permitted.



**Without resolving these concerns, we fear that uptake of the program could be low.** The problem is further compounded if a farmer is restricted from harvesting a crop due to high biodiversity in native vegetation on a neighbouring property. The Nature Repair Market should be structured to encourage thorough and transparent biodiversity reporting, celebrating the environmental outcomes it achieves.

## Definitions

**Forest:** This definition is supported as it is consistent with that defined in the national context (i.e., trees with a height of at least 2 metres and crown cover of at least 20% - where crown cover is the area of ground covered by tree canopies, ignoring overlaps and gaps).

**Threatened Species and Ecological Communities:** A definition of this term is lacking and must be provided. This is a significant requirement as this method requires project monitoring to identify and record threatened species and ecological communities that occur, or are likely to occur, in proposed Activity Areas and the surrounding landscape.

On this point, NFF questions the necessity for such species and communities to be monitored in surrounding landscapes (which includes virtual and on-ground assessment of a buffer area of at least 500 metres in width around the parameter of each proposed Activity Area). This poses an additional administrative burden to landholders, and in some cases will require the obtaining of private data from neighbouring properties and businesses. Such information is privileged and confidential and should not be included by a third-party market participant in their Initial Site Assessment Report to the CER.

## Land Clearing

Land included in an Activity Area must have been comprehensively cleared more than seven-years prior to date of project application (or five-years if there has been a change of ownership). The “*comprehensively cleared*” threshold of 90% defined at a 10 X 10 metre scale other than small trees <5 cm in diameter at breast height is particularly high, and NFF suggest that this could be lowered substantially down to or around 80%.

NFF do not support the inclusion of delay dates. There is no rationale for this. If, for example, the land was illegally cleared, then that process ought to be fully resolved and any requirements or limitations on that land from any decision applied. A blanket timeframe is not necessary, equally if the clearing were to manage woody and/ or invasive weeds then consequent replanting with endemic species should be encouraged not delayed.

## Initial Site Assessment

The proposed methodology requires proponents to undertake an Initial Site Assessment comprised of seven key steps. In recognition that this process is strenuous, time consuming, and requires expertise, the requirement for this initial assessment to be undertaken by a suitably qualified person is supported, the extent to which all or part of this is a natural extension service from, for example, an NRM region, is one that needs



further development and support.

## Reference Ecosystem(s)

All lands proposed to be included in an Activity Area must be assigned a Reference Ecosystem using a prescribed vegetation classification for the project location. Examples include components such as the State and Territory-based condition benchmark tools (Biodiversity Assessment Method, BioCondition, etc.). The requirements underpinning the assignment process will require use of prescribed vegetation maps accessible via the Platform for Land and Nature Repair (PLANR) interface. The requirement to conduct a virtual and on-ground site assessment of the proposed Activity Areas to verify the accuracy of the prescribed vegetation map is understood, although questioned, and again could be subject to a service offering via public funded positions.

It is the responsibility of the CER or Department to ensure that the EKS is developed in a manner whereby it is producing consistent, accurate, and high-quality results for landholders. Provided that use of the EKS will be a requirement for certain methodologies including this methodology, this burden of responsibility falls on the Nature Repair Market Team and Department. NFF support efforts to ground-truth results in the form of in-person verification, however, practical measures should be undertaken to ensure the EKS is robust to avoid shifting the verification and associated costs onto the landholder. This will also enshrine community confidence and trust in the process.

**The NFF have identified several flaws in the web-based PLANR management tool which impede functionality and usability for landholders.** These issues demand urgent attention and must be resolved prior to market commencement to ensure there are no impediments toward participation. These include but are not limited to:

- *Ability to input cost of land does not function correctly in some instances.*
- *No ability to describe native pasture.*
- *No ability to select an option that pasture is not renewed.*
- *Further refinement and clarity to explain figures for tree cover VS ground cover. For example, in one instance, tree cover indicated 20% forest while ground cover displayed at 0%. This is imperative as target levels for native vegetation cover will be set in the National Biodiversity Assessment Instrument to determine biodiversity outcomes required.*
- *Greater functionality and customisation required for the carbon sequestration section.*
- *Significant improvement to the scope and detail of the project planning section (information that must be submitted under a Project Plan with an application to register a biodiversity project for this methodology). For example, requirements to include significant work such as fencing and firebreaks.*

**NFF remains highly sceptical of the accuracy of NVIS pre-1750 vegetation mapping to inform the development of Reference Ecosystems.** Undertaking such a mapping exercise will be prone to inaccuracies and assumptions, to the potential detriment of market participants. This is because the setting of a project start date must be accompanied alongside clear evidence of how the land was previously. This date of 1750 is questioned, and we seek an explanation for its determination.

## Determining Starting Ecological Condition for Activity Areas

The National Biodiversity Assessment System (NBAS) must be used by proponents to calculate the starting ecosystem condition score, predicted target ecosystem condition score, and broader biodiversity benefits such as expected change in connectivity. NBAS will be accessed through the EKS PLANR platform of which NFF have identified several issues as raised above. These need to be resolved and the platform stress-tested to ensure that the working steps to provide a score are bug-free and in working condition.

Provided the significant role that the EKS will play for proponents in this methodology, it is imperative that **the PLANR platform at a minimum be accompanied with an easily accessible, strongly maintained, and continuously resourced human service capability that supports and resolves user enquiries and issues.** Similar platforms designed to support equivalent outcomes such as the New South Wales Biodiversity Conservation Trust (BCT) do not have staff available to call landholders to provide user support. Contact in the BCT is primarily conducted either through email communication or an automatic chat box, outcomes that are significantly limited and unsatisfactory. The PLANR platform must learn from the limitations of comparable services to ensure the Nature Repair Market is operating in an accessible, user-friendly manner that enshrines user confidence. Landholder participation is essential to ensuring the success of the market and any effort to support this must be undertaken.

### Transect Monitoring

The requirement to establish transects, monitoring points, and a mechanism to store data measurements in each proposed activity to monitor the life cycle of the project area and support Initial Site Assessment Report requirements including photo point monitoring, point-intercept, and quadrant methods will be burdensome for some landholders. This will require careful management and maintenance of digital data systems or the employ of a party acting on a proponent's behalf. This also lends itself to the provision of a publicly funded extension support mechanism. The role of the landholder must be allowed to go beyond choosing a consultant/proponent, this needs to be self-enabling and supported unless the landholder chooses otherwise. It was designed at the Pilot Stage to have a landholder user interface; this should be a continued key driver.

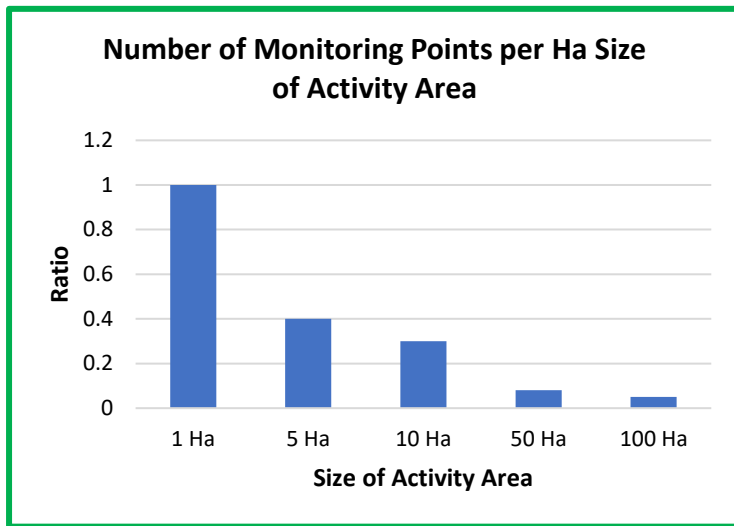
Site assessments must also be undertaken at the time of optimal growth for the region to maximise potential to identify species. This information needs to be published so that landholders are aware of such timings.

### Transects

For projects with statutory First Nations Rights or Interest holders in the proposed Activity Area, the location of the transect sites must be cleared for culturally sensitive location prior to finalisation. The NFF seeks clarification as to whether such locations will include Native Title applications.

## Establishing Monitoring Points

NFF notes the proposed number of monitoring points required for each Activity Area that cumulatively are required to add to a combined area of at least 5 hectares. The number of monitoring points required per hectare size of Activity Area does not disproportionately burden areas of significant size when drawing comparison via ratios. This approach is supported, and all effort should be undertaken to reduce the administrative burden to landholders.



**Figure 2:** Number of monitoring points per hectare size of Activity Area (ratio).

## Permanence Period

Biodiversity projects are required to be maintained for the following permanence period to obtain a Biodiversity Certificate. This may require remedial plantings.

- **Type A:** 25-years.
- **Type B:** 100-years.

These permanence period requirements are aligned with requirements stipulated under the *Nature Repair Act 2023*. Type C permanence periods are not included as eligible under this methodology. A rationale for this is requested.

## Project Activities

### Planting Requirements

The methodology requires that soil preparation for planting activity must not include deep-ripping or other mechanical methods that involve significant soil disturbance in planting areas with significant biodiversity or natural/cultural heritage values, including areas that contain remnant vegetation in the ground layer or sites of Indigenous cultural significance. However, elsewhere it is stated “ground and rock disturbance, including ploughing, ripping or equivalent, other than necessary for the purpose of plantings under the method” are permitted. Common-sense should prevail; we seek clarity on this.

Mechanised direct seeding is a common approach used to support establishment in large areas of land. In the absence of clear definitions, there is a concern that this requirement will bar direct seeding via mechanical means from being utilised to support initial project activity in areas of poorer fertility class that support significant biodiversity values. This process involves the ripping and disturbance of soil at an appropriate depth (to avoid scalping and erosion), and in many cases delivers superior outcomes than less disruptive mechanisms as it allows the development of healthier root systems, supports long-term rainfall soil penetration outcomes, enables deeper regeneration, is more efficient from an economic standpoint, and allows a diversity of species to be established at relatively low effort (an outcome aligned with this method). The intricacies of this requirement need to be considered, and guidance provided to address concerns and uncertainties that may arise.

## Management Activities

NFF questions whether the requirement for proponents to manage total grazing pressure including from vertebrate pests where they present a threat to the establishment of plants prior to and/or during planting or direct seeding, or where they present a threat to achievement of the biodiversity outcome will be stackable with a potential future equivalent methodology for vertebrate pests that would recognise existing and additional action to support 'Nature Repair' outcomes. We also urge the Committee to consider in the development of a vertebrate pest methodology the suitability of whether record keeping demonstrating management of feral pests required under this proposed methodology (labour hours, method used, timing of activities, location of management, number/species killed) would provide a sufficient evidence base. Stacking should be allowed as it will provide a further incentive for participants to engage in this methodology – an important outcome provided our commentary above regarding the economic viability of this method.

## Monitoring

A Monitoring Report must be prepared in accordance with the method and submitted with:

- A Category A Report provided in an application for a Biodiversity Certificate.
- Each subsequent Category A Report.
- Each Category B Report provided in accordance with the *Nature Repair Act 2023* statutory rules.

## Category A Biodiversity Project Reports

A Category A Biodiversity Project Report must accompany the application for the issuance of a Biodiversity Certificate. Subsequent Category A Reports must be submitted in accordance with a timeframe specified by the Rules, this requires Reports to be provided at least every five-years from when a Biodiversity Certificate is issued. As outlined in legislation, a failure to provide a Category A Report will result in a maximum civil penalty of 200 penalty units (\$66,000).

Nature Repair Market rules that will support the operation of the market including requirements for Category A and B Reports were recently consulted on by the Department in its *Nature Repair Market Legislation* public consultation. As articulated in the NFF submission, NFF supports the proposed content of Category A and Category B Reports as

presented in that Discussion Paper. Reporting should allow for digital submission and flexibility in timing to reduce administrative burdens on landholders, and audits be conducted based on a risk framework that considers the size and complexity of the project.

## Category B Biodiversity Project Report

Category B Biodiversity Project Reports are submitted before an application for a certificate has been lodged. Nature Repair Market rules will determine if and when such reports are required. Legislation allows a methodology determination to outline information required for inclusion in a Category A and B Report submitted to the CER. This methodology requires a Category B Report to contain a Monitoring Report and an assessment of biodiversity project implementation against the Project Plan.

NFF understands that the Department is considering a requirement for a Category B Report to be provided to the CER at or within six months of the five-year period following project registration and at least once every five-years across all methodologies thereafter. The NFF supports the six-month timeframe as this supports the legislated power for the CER to consider cancellation of a registered project five-years after its registration if the project has not commenced or is unlikely to result in the issuance of a Biodiversity Certificate.

The NFF does not object to the five-year timeframe interval. We again urge that reporting allow for digital submission and flexibility in timing. This ensures a balance between regulatory burden for landholders and regular assessment of biodiversity outcomes, an important measure for safeguarding market integrity.

## Indigenous Cultural and Intellectual Property

**Given the timing and stage of development of several key documents, references to Indigenous Cultural Intellectual Property (ICIP) should be removed from this Discussion Paper until the matter is resolved in the appropriate forum.** While Federal Government has announced (March 2024) a commitment to commence formal staged consultation on the design of new laws to protect First Nations traditional knowledge and cultural expressions to support ICIP, Government has not introduced stand-alone legislation to address this concept. As stated by the Office for the Arts, “*consultation will be conducted in a staged manner, later stages will address the broader rights relating to ICIP*”. Until this is resolved in an open and transparent manner **(including with meaningful and timely consultation with the agricultural sector)**, it is premature for ICIP to be mentioned anywhere in this Biodiversity Assessment Instrument document.

## Application for Biodiversity Certificate

**As required in legislation, a Nature Repair Market methodology determination is required to outline the conditions that must be met for an application and biodiversity certificate to be issued with regards to a biodiversity project.**

NFF support the conditions for certification application and the requirement that an application for a Biodiversity Certificate is supported by a Monitoring Report (the evidence piece). The requirement that projects with an Activity Area greater than 10 Ha are required

to satisfy thresholds at 75% or more of monitoring areas established within an Activity Area is also supported.

**Table 1:** Ecological indicator thresholds for certificate issuance.

Indicator	Strata/life form	Threshold	Source
Canopy height	Canopy	The lower of $\geq 5$ m or $\geq 1/3$ of Reference Ecosystem	State Reference Ecosystem
Native vegetation cover	Canopy	$\geq 1/3$ of Reference Ecosystem	
	Understory	$\geq 1/3$ of Reference Ecosystem	
Native species richness	Canopy	$\geq 90\%$ of nominated composition target	Proponent nominated % of State Reference Ecosystem (target level 1-4)
	Understory	$\geq 90\%$ of nominated composition target	
Non-native plant cover	Cover from non-native trees, shrubs, and vines	Level 1: $\leq 15\%$ Level 2: $\leq 10\%$ Level 3: $\leq 7.5\%$ Level 4: $\leq 5\%$	Proponent nominated (target level 1-4)
	Cover from non-native grasses & forbs	Level 1: Either $\leq 20\%$ or $\leq$ baseline cover Level 2: Either $\leq 10\%$ or $\leq 85\%$ of baseline cover Level 3: Either $\leq 10\%$ or $\leq 60\%$ of baseline cover Level 4: Either $\leq 5\%$ or $\leq 35\%$ of baseline cover	Proponent nominated (target level 1-4)

## Conclusion

The NFF thanks the Nature Repair Committee for its proactive engagement with NFF on this matter and we eagerly await future consultation opportunities as additional methodologies are finalised for public discourse. It is critical that landholders and NFF remain at the centre of these discussions. Please do not hesitate to contact Warwick Ragg, General Manager, Natural Resource Management, via e-mail: [WRagg@nff.org.au](mailto:WRagg@nff.org.au) at the first instance to progress this discussion.

Yours sincerely,



**TONY MAHAR**

Chief Executive Officer



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