



1 July 2026

Agvet Chemicals Policy
Department of Agriculture, Fisheries and Forestry

Via email: agvetpolicy@aff.gov.au

Dear Agvet Chemicals Policy team,

RE: Shaping regulation of agricultural emission inhibitor products

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Department of Agriculture, Fisheries and Forestry's (the Department's) consultation on regulation of agricultural emission inhibitor products.

The agriculture industry is committed to contributing to national emissions reduction goals, and the NFF acknowledges that emerging technologies including agricultural emission inhibitor products can support this effort. Consistent with the agriculture and land sector plan, real challenges persist which hamper the adoption and effectiveness of these technologies. Progressing this issue will be important to allow alignment with the development of a new Australian Carbon Credit Unit (ACCU) Scheme Livestock method including methane-inhibiting feed additives.

The NFF welcomes the Department's consideration of potential approaches to address these challenges, including the current regulatory environment which is rightly summarised in the discussion paper as being "fragmented, incomplete and ambiguous".

The NFF, as per its Agricultural Chemicals and Veterinary Medicines Policy, seeks an efficient, science- and risk-based regulatory environment that delivers world-leading access to technology – including agricultural emission inhibitor products.

The current regulatory approach fails to deliver assurance to producers, the supply chain, consumers and the community at large that such products are safe and effective. This includes human, environmental, animal, and food safety considerations. This is a key issue which erodes social licence and poses significant trade risks – risks which have been realised in situations including dicyandiamide, or DCD, in New Zealand exports in 2013.

The NFF believes some form of statutory regulation is needed to provide the required level of assurance. However, regulation must be risk-appropriate and not create additional barriers to adoption of these products in Australia. Manufacturers should not be disincentivised from registering or selling such products in Australia, while low-risk products should be dealt with in an efficient

manner equivalent to the risks posed to health, the environment, and trade. Any regulatory pathway must not be unnecessarily onerous or costly, or lead to lengthy delays in registration or approval of products. Consideration should also be given to how regulators are funded and resourced to ensure they can meet any additional responsibilities without impacting on delivery of existing duties.

The NFF notes that the risk is currently perceived to be higher in products directly delivered to animals, such as methane inhibitors including 3NOP and bromoform. Animal health and wellbeing, food safety, and trade risks are key concerns and must be addressed through regulatory mechanisms that provide assurance in these areas. While many of those concerns are relevant to nitrification inhibitors, we acknowledge the risk (real or perceived) of many of those products are lower – particularly around animal health and welfare. A risk-appropriate regulatory pathway must still provide assurance around Maximum Residue Limits or MRLs for both food safety and trade, but a different regulatory posture may be more suitable.

The NFF believes that assurance relating to animal and human health, food safety, and trade are vital. As noted in the discussion paper, a statutory regulation model could utilise existing capabilities and expertise of regulators including APVMA and FSANZ. However, verification of emissions reduction may require different regulatory approaches, including alignment with the development of Australian Carbon Credit Unit (ACCU) methodologies and other mechanisms to support verification of nitrification inhibitors where an ACCU methodology is not yet available.

While broadly supportive of the need for regulation, the NFF strongly believes that further consultation must be undertaken on specific regulatory pathways and scope that could be implemented across the range of agricultural emission inhibitor products. This would include the roles of different bodies, including the APVMA, FSANZ, and potentially the Clean Energy Regulator. The NFF is a willing partner in this necessary further work.

The NFF thanks the Department for the opportunity to make a submission on potential regulatory approaches to agricultural emission inhibitor products and urges the Department to consider the perspectives of NFF member organisations presented in their own submissions.

Yours sincerely

MICHAEL GUERIN
Chief Executive Officer