



Australian Government
Department of Agriculture,
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Assuring agricultural sustainability claims: discussion paper

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Acknowledgement of Country

We acknowledge the continuous connection of First Nations Traditional Owners and Custodians to the lands, seas and waters of Australia. We recognise their care for and cultivation of Country. We pay respect to Elders past and present, and recognise their knowledge and contribution to the productivity, innovation and sustainability of Australia's agriculture, fisheries and forestry industries.

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1 Background

The Australian Agricultural Traceability Alliance is a coalition of partners with an interest in enhancing national agricultural traceability. Partners include producers, value-adding businesses, state and territory governments, logistics firms, data services providers, processors, exporters, researchers and retailers.

The Department of Agriculture, Forestry and Fisheries formed the Australian Agricultural Traceability Governance Group (AATGG). It is part of a broader governance framework for the alliance to help develop and implement the *National Agricultural Traceability Strategy 2023 to 2033*.

The *National Agricultural Traceability Strategy Implementation Plan* guides the Australian Government's \$100 million investment in Australia's agricultural traceability systems. This investment builds on the already strong traceability frameworks, especially around food safety, food provenance and biosecurity.

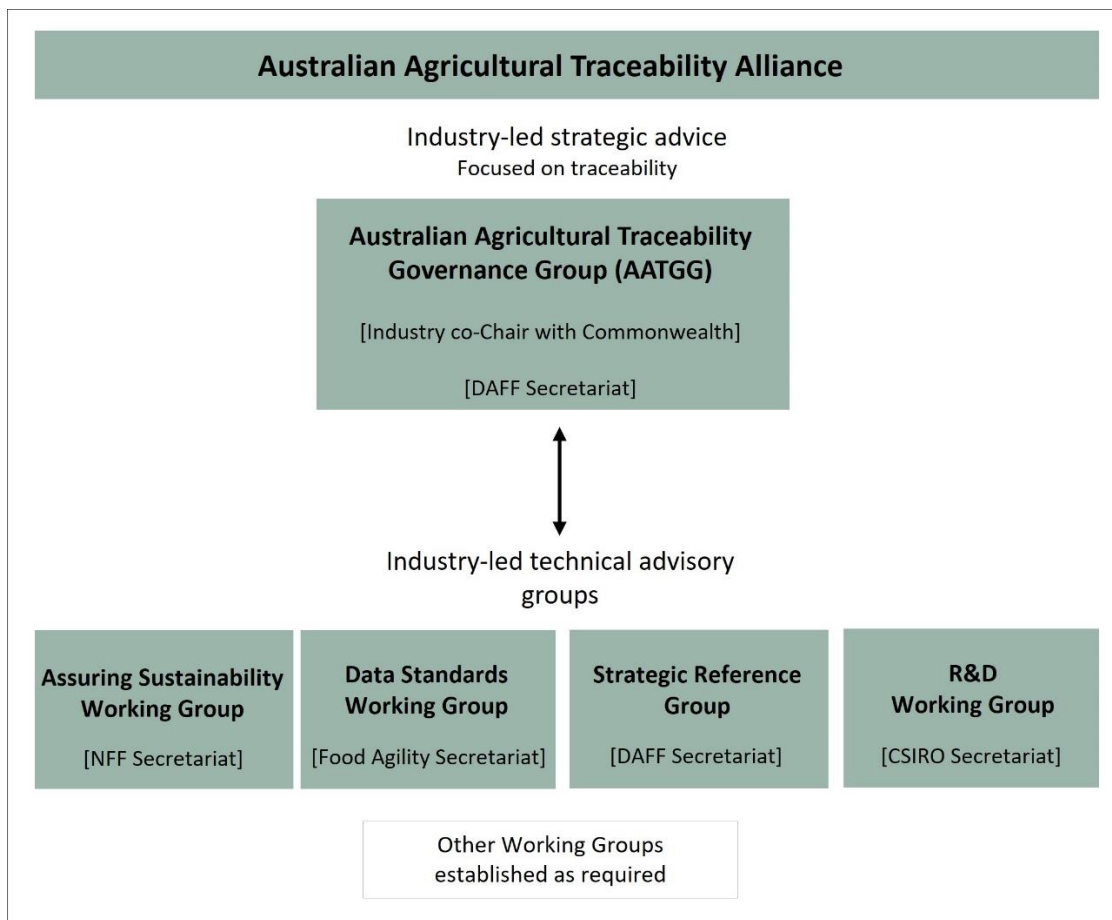
The AATGG coordinates and governs the Australian Agricultural Traceability Assuring Sustainability Claims Working Group (ASCWG). The ASCWG is one of 3 working groups that will advise the AATGG on implementing the strategy. The AATGG seeks to ensure effective and non-duplicative efforts on agricultural traceability in Australia through coordinated implementation.

Each AATGG working group has been tasked to engage broadly with stakeholders to prepare a discussion paper to inform the strategy's implementation. The topics being explored are:

- data interoperability standards to support traceability (Data Standards Working Group)
- assuring agricultural sustainability claims (ASCWG)
- understanding research and development needs (Research and Development Working Group).

Figure 1 provides an overview of the governance framework.

Figure 1 Governance framework of the AATGG



The ASCWG has members from governments, the private sector, industry, and the research and communities. It is co-chaired by the NFF and CSIRO. The NFF provides the secretariat to the working group.

1.1 Working group

The ASCWG has the responsibility to help Australian agricultural industry prove its sustainability and provide assurance that evidence exists to support sustainability credential claims. Traceability is a critical factor in enabling assurance of sustainability claims.

ASCWG’s success will be measured by advice provided to the AATGG to inform implementation of the strategy, and by Australia’s agricultural industry having ways to provide evidence that are efficient and support sustainability claims.

Such claims will support international trade and market access for Australian food and fibre. They will also limit compliance burdens on individual farmers and others in the supply chain.

To achieve this outcome the ASCWG is considering 3 aspects:

1 Understand essential sustainability credentials

- Understand which sustainability claims are essential for proving Australian agriculture's sustainability status in international markets across different sectors, and what is required as evidence to support these claims.

2 Identify approaches to support data-driven claims

- Understand how data and other forms of evidence are used to support the verification of a sustainability claim.
- Identify gaps in data availability and propose how to remove barriers to data availability.
- Propose approaches for effective data collection and sharing to enable seamless integration with existing traceability systems or through the creation of traceability systems, for many purposes.

3 Support verification for market access purposes

- Advise on using existing and emerging data which may support verification of sustainability claims to maintain market access in response to emerging, complex regulatory requirements.

A report will support this outcome. It will make recommendations that consider Australia's unique environment and production conditions, and ways to provide evidence for sustainability claims that use existing data sets and industry initiatives that are based on international market regulatory requirements.

1.2 Final report development

Development of the final report will be completed in 2 phases.

Phase 1

Consultation and desktop research during Phase 1 will:

- 1) document major current and emerging international market and regulatory requirements in relation to sustainability claims
- 2) define priority sustainability principles and criteria that respond to emerging international market and compliance requirements and are common to sustainability claims
- 3) identify and assess current and emerging approaches to demonstrating sustainability claims and their capacity to respond to international market requirements
- 4) assess key data points or datasets that lend themselves to supporting the verification of sustainability claims.

A combination of desktop research, targeted interviews and broad stakeholder consultation through the release of this initial paper is being used under this phase.

Phase 2

Based on the outcomes of Phase 1, a discussion paper will be prepared that:

- 1) conceptualises possible approaches to providing evidence-based sustainability claims and their application within Australian agriculture
- 2) identifies key issues that must be considered when determining the best approaches to providing evidence to support sustainability claims
- 3) poses options with respect to issues that may be important in identifying an appropriate approach to operationalising a sustainability claim verification system that is interoperable with existing and proposed department and industry traceability systems and assists the AATGG in its deliberations.

This initial discussion paper addresses points one to 3 in [Phase 1](#).

1.3 Development approach

This paper draws on desktop research, targeted interviews with 12 government, industry and supply chain stakeholders and an analysis of material sustainability topics. It also uses market information, and the combined knowledge of the project team and working group.

1.3.1 Desktop research

A range of documents were reviewed in the development of this paper and are included at [References](#). The working group initially suggested a list of documents to the authors. These were shortlisted for relevance to the in-scope markets and sectors (see [Scope and purpose](#)). We reviewed more documents based on those found in the desktop research and stakeholder interviews. We also reviewed materiality assessments and industry sustainability framework reports for the relevant sectors. We reviewed and analysed all information for trends and commonalities. We then distilled the findings and overlaid them with the interview findings.

1.3.2 Interviews

In consultation with working group co-chairs, we identified stakeholders from government, industry and supply chains, based on their relevance to the markets and sectors within [Scope and purpose](#).

We conducted interviews online and structured them around understanding:

- what sustainability outcomes markets/companies are currently being asked to demonstrate and against which requirements
- what's driving these requests
- what the expectations for evidence are
- how is that evidence expected to be provided
- what key subjects or topics are of particular focus
- what may be emerging in the future.

Interviews were analysed for trends and commonalities. We distilled the findings and overlaid them with the desktop research findings.

1.3.3 Scope and purpose

It is recognised this paper is based on a small set of stakeholder perspectives. The paper aims to canvass stakeholder knowledge and views widely. It seeks to understand current and emerging expectations from international markets for providing evidence for sustainability claims that use existing data sets and addresses current and emerging market and regulatory requirements.

This paper focuses on 8 sectors. Sectors were selected through an analysis of the:

- total export market value (Australian dollars) for the financial year 2022–23 to identify the highest value sectors
- diverse range of export market destinations for each commodity to ensure a broad selection of markets across all sectors
- differing levels of maturity in relation to sustainability regulation and requirements, both for the industry and for different export markets.

Based on this analysis, the sectors and markets within the scope of this paper are:

- Sectors
 - Wheat
 - Beef
 - Canola
 - Cotton
 - Wool
 - Seafood
 - Dairy
 - Horticulture (fruit and vegetables).
- Markets
 - EU
 - East Asia
 - South-East Asia
 - North America (principally the US).

1.3.4 Guiding principles

To focus the paper the ASCWG identified guiding principles that can be summarised as:

Focus on evidence-based sustainability claims

Ensure that Australian agriculture sustainability claims support export market and regulatory requirements, integrating both regulatory and non-regulatory approaches.

Build on existing efforts

Build on existing national and industry-level sustainability initiatives, while evolving as learnings are made and new data becomes available to address gaps.

Industry-level focus with supply chain consideration

The focus is on sustainability claims at the whole of industry level rather than individual farms, but it may consider the role of different actors across the supply chain, from farms to retailers.

Data and verification

Emphasis is placed on using existing data to support sustainability claims and identifying gaps where data or information needs to be collected or otherwise synthesised. Verification methods, whether through standards or innovative approaches beyond typical audit-based certification, are critical for credibility.

Market access and regulatory compliance

Sustainability claims are relevant for international trade, market access, financial sectors, and corporate sustainability reporting, and may differ for various audiences. The focus of this paper is on export market access and regulatory compliance.

Adaptability and relevance

The proposed approaches must be relevant to Australia's unique agricultural environment without imposing undue burdens on participants, while aligning with international trade rules and evidence-based decision-making systems.

1.3.5 Audience

There are many audiences for this paper including governments, industry bodies, supply chain participants, and regulators.

All feedback is welcome that assists in identifying approaches and requirements expected by markets to provide evidence for sustainability claims that leverage existing data sets and address current and emerging regulatory requirements.

Input is particularly encouraged from supply chain participants in major export markets for Australian food and fibre products.

Ultimately, the final report will support and inform:

- government agencies and industry bodies involved with international trade relations
- those with an interest in evidenced-based sustainability claims and traceability of these claims
- participants in supply chains who develop or buy systems for evidenced-based sustainability claims along the supply chain (e.g. input providers, primary producers, processors, freight forwarders, importers, exporters, wholesalers, retailers)
- assessment bodies that verify sustainability claims and issue credentials where applicable
- technology providers who develop systems that underpin evidence-based sustainability claims
- researchers (public and private) with an interest in sustainability claims, traceability, supply chain, market access, and related topics
- buyers of environmental outcomes (e.g. green finance, carbon, biodiversity and other environmental, social, and governance (ESG) markets)

- agricultural industry bodies that advocate for supply chain participants.

2 International market and regulatory requirements

Many of Australia's international agricultural markets are placing increasing emphasis on sustainability. This is being driven by regulatory changes, corporate responsibility initiatives and, in some cases, as a response to activist activity. Rarely does the driver for demonstrating sustainability appear to be purely responding to consumer expectations.

As a result, sustainability, and the ability to demonstrate that a product has been produced sustainably, is increasingly becoming a key factor in market access negotiations at the government to government, industry to government and business to business levels.

At the government level, different markets have implemented their own domestic regulations, often driven by environmental goals, climate change mitigation strategies, and ethical considerations. In particular, the EU is leading in pushing for transparency and accountability in sustainability claims. The result is enhanced reporting requirements for supply chain participants about the sustainability of their operations. Other major markets such as the United States, East Asia, and increasingly, Southeast Asia, are following suit.

It is still too early to determine whether these markets will implement consistent requirements or if internal pressures will lead to diverse expectations across different markets resulting in businesses facing varied compliance landscapes. Such uncertainty was evident earlier in 2024 when the US Securities Exchange Commission (SEC) ruled that companies only need to report Scope 3 emissions if they are material to investors or part of specific reduction targets. This ruling highlights the differing regulatory priorities where the US seeks a balance between transparency and compliance burden, while the EU emphasises comprehensive corporate responsibility and aligning business practices with climate goals. In a similar fashion, an increasing number of global corporate entities are choosing to implement sustainable sourcing policies or similar. This may be in response to regulations in their local reporting jurisdiction or for purely business reasons (e.g. corporate social responsibility, social licence, or in response to activist pressure).

Whatever the reason for the increasing focus and emphasis on sustainability and the source of the changing expectations, agricultural sectors in Australia must understand these changing requirements and ensure that they can provide the necessary evidence to meet them.

In terms of the nature of the evidence being sought, many sectors, including horticulture and dairy, described a growing requirement from retailers and fast-moving consumer goods (FMCG) companies for suppliers to be compliant with an international sustainability standard such as the Sustainable Agriculture Initiative (SAI) platform.

The grains industry also highlighted the importance of negotiating sustainability specifications with international buyers to ensure market confidence and access.

The seafood industry highlighted the importance of certifications like the Marine Stewardship Council (MSC) for access to UK and EU markets, while noting that such certifications are less critical in Asian markets, where the origin of Australian seafood itself is a strong quality marker.

Sustainability claims must align with these requirements to ensure market access, particularly in regions like the EU, the US and key Asian markets. Verification of sustainability practices are becoming non-negotiable, especially as ESG regulations and reporting requirements evolve.

2.1 Current and emerging compliance requirements

2.1.1 Free trade agreements

An analysis of several free trade agreements (FTAs) to which Australia is a signatory and that are relevant to the markets outlined in [Scope and purpose](#), reveals that agricultural sustainability is not a primary focus in most agreements nor do they directly impose any kind of expectation of assurance. However, many of these agreements include provisions related to environmental sustainability that indirectly include the agricultural sector. These provisions, while often broad and aspirational, reflect a general commitment to fostering sustainability across various industries, including agriculture.

In many cases, the agreements contain general environmental commitments that signal a desire to collaborate on sustainability initiatives, without setting specific targets. For example, while the Singapore-Australia Free Trade Agreement (SAFTA) does not directly address agricultural sustainability, this is covered under the Singapore-Australia Green Economy Agreement (GEA). The GEA promotes the use of sustainable agricultural practices aimed at enhancing food security, limiting climate change impacts and reducing the environmental footprint of agriculture. Key principles from the GEA include supporting investment in sustainable agri-food systems and implementing practices that adapt to climate change while reducing greenhouse gas emissions.

Other FTAs and related bilateral commitments emphasise cooperation on sustainability related topics such as management of natural resources, land use and biodiversity conservation, which could affect agricultural practices in Australia. While these commitments are often aspirational, they lay the groundwork for future cooperation on sustainable agricultural development which may result in more specific direction to industry in the future.

While Australia does not yet have an FTA with the EU, it is anticipated that any future agreement will likely include stronger commitments around agricultural sustainability, reflecting the EU's emphasis on strong environmental standards. However, the specific nature of these commitments remains, at present, unclear.

2.1.2 European Union

The EU's sustainability regulations, particularly the Farm to Fork Strategy, aim to transition toward a more sustainable and fair food system. The EU's Green Deal is focused on making the EU climate neutral by 2050. It emphasises the reduction of pesticide use, improvement of animal welfare, and the promotion of organic farming.

Similarly, the Regulation on Deforestation-free Products (EUDR), seeks to tackle global deforestation by banning the import and export of specific products that have been produced on land deemed to have suffered deforestation since December 2020. Further, a benchmarking system will classify

countries into 3 risk categories according to the risk of producing commodities that are not deforestation-free. EUDR was due to come into effect December 2024 but during this paper's development, a delay was announced.

The Carbon Border Adjustment Mechanism (CBAM), due to start in 2026, will impose taxes on carbon-intensive imports. While agriculture is currently excluded from the CBAM, it is possible that agriculture could be included post-2030, after the initial 2026 to 2034 transition period. This would likely affect agricultural products with high greenhouse gas (GHG) footprints. The Corporate Sustainability Reporting Directive (CSRD) broadens the scope of corporate sustainability reporting to cover more companies, introduces more detailed disclosure standards aligned with EU sustainability goals, and requires external audits to ensure accuracy. Australian companies may be impacted as a result of their presence in the EU or supply to EU companies.

Certifications such as GlobalGAP, SAI Platform, the International Sustainability and Carbon Certification (ISCC) program and compliance with the EU's strong animal welfare and environmental protection standards, are becoming expected for market access.

Most importantly, while the EU is not the largest market for Australian agricultural exports, the EU's regulatory influence is profound and increasingly shaping global trade practices. This is occurring for 2 reasons:

Domestic farmer sentiment

Farmers in the EU are increasingly pushing back against strong domestic sustainability requirements, arguing that these regulations place them at a competitive disadvantage unless similar standards are applied to imported agricultural products. They contend that, unless imports are held to the same standards, cheaper goods from regions with less rigorous environmental and social requirements could flood the EU market, undermining their efforts and profitability.

Equally, there is also a strong farmer narrative that the cost of providing such information falls to farmers and they argue there is insufficient subsidy to cover this burden.

As a result, there is growing pressure from EU agricultural groups for the European Commission to enforce stricter sustainability requirements on imports, ensuring that foreign producers meet the same high standards as domestic farmers. This push aims to level the playing field and protect EU farmers from unfair competition while also promoting global environmental and ethical farming practices. By setting these standards for imports, the EU effectively extends its regulatory influence beyond its borders, shaping global trade practices and compelling foreign producers to meet its criteria to access EU market.

Trade relations

Many of Australia's key export markets, such as Japan, South Korea, and China, are either aligning with or taking inspiration from EU sustainability standards. This alignment is driven by a combination of factors, including the desire to strengthen trade relations with the EU and bilateral agreements. Another driver may be simply efficiency in that it may be more efficient to set expectations at the highest level if it addresses the broadest range of expectations.

For Australian agriculture, this alignment has significant implications. Even if Australian products are not directly entering the EU, they must still comply with EU-inspired regulations in key markets like

Japan and South Korea. This includes providing evidence of sustainable practices across various areas, such as carbon emissions, water usage, and biodiversity conservation.

2.1.3 North America – United States

For Australian food and fibre exports to the US, sustainability expectations are increasingly shaped by a combination of corporate initiatives and emerging regulatory frameworks. While the US does not have federal sustainability policies as strong as the EU, sustainability is becoming a critical market differentiator.

Many major US retailers and food companies are setting ambitious sustainability targets for their supply chains. These include commitments to reducing emissions, promoting regenerative agriculture, and ensuring that suppliers meet sustainability benchmarks, such as reduced pesticide use and enhanced biodiversity protection. As a result, FMCG's supplying these retailers and food companies are aligning their commitments thereby requiring their suppliers to demonstrate progress against targets.

The US is also introducing supply chain transparency regulations, focusing on components of sustainability through the US Green Trade Strategy and ethical labour practices through the Uyghur Forced Labor Prevention Act (UFLPA).

Internal pressures may have significant implications for ESG policies, particularly in light of the upcoming elections. The ruling by the US SEC earlier in 2024 regarding Scope 3 emissions was in response to feedback and concerns from businesses and other stakeholders in relation to the complexity and uncertainty surrounding measuring Scope 3 emissions, difficulty in calculating Scope 3 emissions accurately, and the potential for liability along with the significant cost and effort required to gather reliable data. Investor feedback in relation to the sentiment there was no standardised approach to reporting Scope 3 emissions at this stage, was also a factor in the ruling

2.1.4 East Asia and Southeast Asia

While sustainability expectations are less formalised in many Asian countries, the demand is rising, especially in premium markets like Japan and South Korea. These demands are often driven from or directly linked to EU regulations. For example, Japan's focus on organic certification, through the Japanese Agricultural Standards (JAS), mirrors the EU's emphasis on organic production.

China, one of Australia's key agricultural markets, is slowly increasing its environmental regulations, particularly concerning greenhouse gas emissions and food safety standards. Anecdotally it was noted that China's drive in relation to emissions regulation stemmed from air quality concerns more so than environmental goals. For cereals and vegetables, the Green Food Standard in China is a certification system that focuses on promoting agricultural products that are produced sustainably, with minimal environmental impact. It emphasises the use of safe agricultural practices, particularly concerning the responsible use of fertilisers, pesticides, and water, to ensure that products are environmentally friendly and safe for consumers.

Certifications like the MSC are important for seafood exports although for some East Asian and Southeast Asian markets in particular, a demand for Australian product outstrips expectations around evidence-based sustainability claims.

Consultation question 1: What other current and emerging regulatory requirements are missing from Section 2.1?

Please include in your response which markets and/or sectors the requirements apply to.

2.2 Key evidence expectations

Different expectations exist for both the form of the evidence required to support a sustainability claim as well as the subject of that evidence. These differences exist commodity to commodity, market to market and supply chain to supply chain.

2.2.1 Current and emerging expectations – form of evidence

Expectations with respect to the form of evidence that underpins sustainability claims varies between stakeholders but generally can be classified into groups:

Third-party assurance or certifications

Supply chain participants indicated that third-party certifications were often required to underpin sustainability claims for market access, in particular:

- MSC Certified Sustainable Seafood program (seafood)
- GLOBALGAP (plant based)
- SAI Platform (dairy, plant based)
- Australian Wool Sustainability Scheme (AWSS) (wool)
- ISCC program (principally for canola)
- SEDEX (horticulture)
- MyBMP/Better Cotton
- Leading Harvest
- Green Food (plant based)
- Fair Trade
- Regenagri
- Organic certification.

Some Asian markets were less reliant on certifications. In many cases, where certification is relied upon, there is no expectation of evidence other than the certificate. The underlying assumption being that the certification process verifies the evidence avoiding the need for further evidence to be transferred to supply chain participants. In other cases, an additional customer-based layer is imposed whereby the customer verifies the evidence underpinning the certificate through its own audit process or through the use of declarations.

Traceability and data systems

Robust traceability systems are considered key to supporting sustainability claims. In some cases, different customers may require the use of different systems which poses challenges for

organisations with multiple customers. Analysis of satellite imagery was also identified as a tool to ensure compliance with the EU's deforestation regulations by verifying that products are not sourced from deforested land.

Declarations, templates and tools

Some stakeholders indicated the requirement for self-declarations or the use of templates for aspects such as lifecycle assessments or carbon calculators. Supplier codes of conduct, policies and questionnaires were also required in some sectors.

Industry based sustainability frameworks and reports

Some industry stakeholders considered sustainability frameworks and associated reports as meeting market expectations for evidence that supports sustainability claims. Others indicated their frameworks were a tool to engage markets and negotiate market access conditions or communicate initiatives about the overall industry and that there was still the need for evidence through the supply chain and, in many, cases on-farm. Supply chain participants indicated that sustainability frameworks provided a positive narrative for the industry that is helpful to them, but they required more specific evidence at a supplier level than frameworks provide.

Demonstration of regulatory alignment

Compliance with Australian regulation, particularly in relation to modern slavery and other social related topics such as health and safety was considered by industry as sufficient to demonstrate sustainability credentials with regard to these subjects.

Customer audits

There was reference in some cases of supply chain customers conducting their own audits, in addition to the use of third-party certifications.

2.2.2 Current and emerging expectations – subject of evidence

Expectations with respect to the subject of evidence that underpins sustainability claims is typically more topic dependent. The following topics were found to be the most commonly requested:

- carbon emissions and climate impact
- water impacts
- biodiversity and ecosystem health
- social responsibility and labour conditions
- supply chain transparency
- soil health and land management
- resource efficiency and circular economy practices
- policies and practices.

Even for animal-based sectors, subjects such as carbon, water, biodiversity and social factors were raised as higher priorities requiring evidence to support a sustainability claim. Animal welfare is very specific to each animal-based commodity and, in many cases, appears to be factored into supply

chain transparency where information on either farming practices (e.g. organic, 'non-mulesed') or the fact animals could be traced is used as a proxy for welfare outcomes.

The subject of the evidence being requested to support these topics is described in the following sections noting that this may be what is expected to underpin claims (or may be emerging as expected) rather than what is requested be provided. For example, in certification programs, supply chain participants are unlikely to request evidence specifically but rather rely on the certification process to verify that such evidence exists. Further, certification schemes do not necessarily mandate measures and the collection of associated metrics but, rather, are often focused on practice change or sustainability outcomes being achieved.

Carbon emissions and climate impact

One of the most significant areas of focus for all international markets is the carbon footprint associated with agricultural production. Markets, particularly in the EU and increasingly Asia and North America, are requiring detailed data be maintained on the GHG emissions produced throughout the supply chain, aligned with the standards of the Paris Agreement. This includes:

- **Measurement of on-farm emissions** – Evidence to show the emissions generated by agricultural activities, including livestock management, crop cultivation, and energy use are known. This could also include quantifying emissions from fuel usage, fertiliser application, and machinery operation.
- **Lifecycle carbon footprint** – Full lifecycle assessment of the carbon footprint of a product. This includes emissions from processing, packaging, transportation, and storage until the product reaches the end consumer. This type of evidence must be quantified and often involves calculating Scope 1 (direct emissions), Scope 2 (indirect emissions from energy), and Scope 3 (other indirect emissions from the supply chain).
- **Emissions reduction measures** – Evidence of practices that actively reduce or offset emissions. This can include maintaining records on renewable energy use, reductions in the use of fossil fuels, improved agricultural practices such as reduced tillage, precision farming, and reforestation projects that sequester carbon.

Water impacts

Evidence demonstrating efficient use of water and sustainable water management practices is often required to gain market access. Evidence typically includes:

- **Water use data** – Quantifying the total water used in agricultural production, from irrigation to processing, showing that usage is within sustainable limits, and that water is being used efficiently and responsibly.
- **Water-saving technologies** – Evidence of the implementation of water-saving technologies, such as drip irrigation, rainwater harvesting, or wastewater recycling. Records showing reductions in water consumption as a direct result of the use of these technologies.
- **Water quality** – Some markets may request impact assessments to demonstrate that agricultural activities do not harm local water ecosystems. This can involve measuring the quality of water discharge and showing that water pollution from runoff or chemicals is being effectively managed.

Biodiversity and ecosystem health

International markets are increasingly demanding evidence that agricultural production does not harm local ecosystems, contribute to deforestation, or result in habitat destruction. Evidence required includes:

- **Land use information** – Providing information on how land is used for agricultural production, including evidence that natural ecosystems such as forests or wetlands are being protected. This may also include records showing that farming practices are not contributing to soil degradation or erosion.
- **Wildlife and habitat conservation** – Evidence that agricultural practices are supporting local wildlife and biodiversity, rather than harming them. This can include records on efforts to maintain wildlife corridors, protect endangered species, or implement practices that enhance biodiversity, such as regenerative agriculture.
- **No deforestation** – For the EU, and likely to apply to those markets seeking to align with the EU, evidence that agricultural products are not sourced from deforested areas is becoming critical. This may involve providing the specific, identifiable location of production so that independent assurance can occur through the assessment of maps, satellite imagery, or land use records.

Social responsibility and labour conditions

The key social requirement related to modern slavery. Evidence that shows agricultural operations adhere to ethical labour practices is crucial for gaining access to many markets, particularly in the EU (and in consideration of aligned markets) and the US.

This includes providing evidence that workers are paid fair wages, work in safe conditions, and are treated ethically. This can involve supplying records on labour practices, worker safety records, and compliance with international labour standards.

Supply chain transparency

Increasingly companies, particularly the US, are requiring greater transparency across supply chains. This includes clear information about the origins of products, farming methods, and the social and environmental impacts of production. Traceability technologies and data on sourcing practices are increasingly important.

Soil health and land management

Many international markets require evidence that agricultural practices maintain or improve soil health. This includes:

- **Soil organic matter and carbon sequestration** – Evidence of efforts to increase soil organic matter and carbon content is increasingly important for markets focused on climate change mitigation. This can involve soil testing results showing improvements in soil fertility and carbon storage over time.
- **Erosion control and sustainable farming practices** – Demonstrating that soil is being managed sustainably to prevent erosion and degradation. Evidence can include records on cover cropping, reduced tillage, or other conservation practices that maintain soil structure and prevent erosion.

- **Nutrient management** – Many markets require evidence that fertilisers are being used efficiently and sustainably, with minimal environmental impact. This can involve providing records on nutrient application rates, runoff prevention, and soil nutrient monitoring.
- **Regenerative practices** – There is rising demand for products that adhere to ‘regenerative’ agricultural principles, noting that this term lacks a clear definition.

Resource efficiency and circular economy practices

International markets are increasingly interested in evidence that producers are using resources efficiently and adopting circular economy principles. This involves minimising waste, reusing materials, and ensuring that by-products are repurposed. Key evidence includes:

- **Waste reduction data** – Providing information on how much waste is generated during production and processing, and what percentage of that waste is recycled, composted, or reused. Evidence of reduced food waste, especially in the supply chain, is particularly important for markets focusing on sustainable consumption.
- **Resource input efficiency** – Markets require records showing that inputs like energy, water, and raw materials are being used efficiently. This can include energy audits, evidence of renewable energy use, or data on input-output ratios in production processes.
- **Recycling and by-product utilisation** – Evidence that by-products from agricultural production (e.g. crop residues, animal manure) are being repurposed, either for energy generation, soil improvement, or other productive uses, is increasingly required.

Policies and practices

In some cases, the expectation for evidence relates to the existence of policies relating to labour practices, environmental protection, as well as the conversion of these policies into day-to-day management practices. This is a risk-based approach to evidence which considers if an organisation has appropriate management practices and the controls in place to ensure these practices occur.

Consultation question 2: Are you aware of other expectations for evidence (form or subject) that are not included in Section 2.2?

Please include in your response which markets and/or sectors the other expectations for evidence apply to.

Consultation question 3: What are the most common forms of evidence being asked for with respect to providing evidence to support sustainability claims?

Please include in your response which markets and/or sectors the common forms of evidence apply to.

Consultation question 4: What are markets expecting in terms of evidence to support compliance with regulations (e.g. demonstrating compliance with work related regulations)?

Please include in your response which markets and/or sectors the types of supporting evidence apply to.

Consultation question 5: Who (e.g. which organisations/agencies) should play a role in assuring sustainability claims for Australian agriculture?

Please include in your response what role each organisation/agency you identify should have.

3 Priority sustainability principles and criteria

Sustainability in agriculture is a multifaceted issue that involves balancing environmental, economic, and social factors. To create credible and impactful sustainability claims, Australian agriculture has needed to define a set of priority principles and criteria that not only address international market demands but also reflect Australia's unique environmental and farming conditions.

Much of this work has been done sector by sector with the introduction of Australian-based sectoral sustainability frameworks, including those listed in Table 1. More recently this is being approached from a whole of industry perspective through the development of the Australian Agricultural Sustainability Framework (AASF). It is recognised that this prioritisation also occurs privately with some post-farm gate actors in the supply chain defining corporate sustainability targets or commitments.

Table 1 Sectors and Australian-based sustainability frameworks

Sectors in scope ^a	Australian-based sustainability framework
Wheat	Australian Grains Industry Sustainability Framework (AGSF)
Beef	Australia Beef Sustainability Framework (ABSF)
Canola	Australian Grain Industry Sustainability Framework (AGSF)
Cotton	PADDOCK:PEOPLE:PLANET – the Australian Cotton Sustainability Framework (ACSF)
Wool	Australian Sheep Sustainability Framework (ASSF)
Dairy products	Australian Dairy Sustainability Framework (ADSF)
Horticulture	Australian-grown Horticulture Sustainability Framework (AHSF)

^a The Australian seafood industry does not have a sustainability framework, instead relying on the MSC.

3.1 Material topics

Prioritisation of sustainability principles and criteria varies sector to sector and across private enterprise. Sectors and some organisations are undertaking materiality assessments to help identify which sustainability topics are of most importance to their sector or business so that principles and criteria can be established for monitoring and measuring performance and reporting and to develop strategies and plans for change.

A review of materiality assessments undertaken at an industry level by sectors in scope and across all of agriculture shows that the topics that are most commonly material across sectors relate to:

- biodiversity, ecosystems, deforestation
- animal wellbeing and husbandry (for animal sectors)
- water security, access and use
- worker health, safety and wellbeing

- biosecurity
- soil health and management
- food or product safety and quality
- GHG emissions
- climate change and resilience and adaptation.

3.2 Critical topics to demonstrating sustainability claims

In discussion with industry, government and supply chain stakeholders, key topics that were most commonly identified as being critical with respect to demonstrating sustainability claims across all markets are:

- GHG emissions
- animal welfare (for animal-based sectors)
- deforestation and land use (including biodiversity)
- chemical use (e.g. pesticides)
- modern slavery and labour conditions
- water and resource use efficiency.

For animal related sectors, animal welfare shared prominence with GHG emissions.

Food safety was a more significant concern in some markets and sectors than other sustainability related topics. Regenerative agriculture was identified by many stakeholders as becoming increasingly of interest although it was noted there is currently no clear definition as to what this is.

3.3 Alignment of priorities

An analysis of the material issues identified through sectoral sustainability materiality reports ([Material topics](#)) and what stakeholders, including government and supply chains, consider critical for sustainability claims ([Critical topics to demonstrating sustainability claims](#)) shows areas of both alignment and differences in focus.

Areas of alignment include:

- GHG emissions – indicating a shared recognition of the importance of addressing climate impact as a critical element of sustainability.
- Animal welfare – reflecting its importance in sectors involving animal production.
- Biodiversity and deforestation – noting a narrower focus identified by stakeholders compared with materiality assessments.
- Water use and security – noting some variation in focus between the 2.

Key differences include:

- Worker health and wellbeing vs labour conditions – reflecting a difference between ensuring a safe and healthy workplace environment (materiality assessments) compared with a broader concern with ethical labour practices, such as preventing exploitation and ensuring fair treatment (stakeholders).
- Soil health – indicating its importance in the agriculture sector's view of sustainability (from materiality assessments) but suggesting that stakeholders, like governments and supply chains, might prioritise other environmental impacts over this aspect.
- Chemical use – suggesting that stakeholders place a significant emphasis on reducing chemical inputs. Likely due to concerns over environmental and human health impacts.
- biosecurity – reflecting its importance for sectors vulnerable to diseases and pests but possibly suggesting that stakeholders may see it as less central to sustainability claims or more as a sector-specific issue or, potentially, indicating an implicit expectation of trading with Australia given its historical and enduring focus on biosecurity as an island nation.
- climate change adaptation and resilience – representing a focus by industry on preparing for and adapting to climate impacts, whereas stakeholders may focus more on emissions reduction.

The shared focus on GHG emissions, animal welfare, water use, biodiversity and deforestation indicates strong alignment between stakeholders on key environmental and ethical concerns, suggesting these areas may be central to sustainability reporting and claims.

Consultation question 6: Do you agree that the topics listed in [section 3.2](#) are critical for demonstrating sustainability claims across all markets?

Consultation question 6a: What other topics would you consider to be critical for demonstrating sustainability claims?

Please include in your response which markets and/or sectors these topics apply to.

3.4 Approaches to demonstrating sustainability claims

Part 2 of [Phase 1](#) will identify current and emerging assurance approaches in Australia and internationally that demonstrate evidence-based sustainability claims, including:

- requirements, standards and nomenclature
- governance and reporting arrangements
- methods used for verifying or assuring claims (e.g. first- or third-party)
- evidence relied upon when verifying claims
- technology platforms utilised for verification or reporting activities
- existing and emerging data sets (or information) utilised as evidence for claims

- key data points (which may include synthesising sustainability reporting requirements into key data points)
- applicable sectors
- benefits, risks and opportunities including those related to maintaining and growing market access and reducing or increasing compliance burden.

Consultation question 7: Are you aware of any current or emerging approaches to demonstrating evidence-based sustainability claims that should be considered in the next phase of this project (that are within scope)?

Consultation question 7a: Please provide details including a link to further information, or the contact details for the entity responsible so we may reach out to them.

Consultation question 8: What challenges do Australian agricultural sectors face in providing the necessary evidence to satisfy international market demands?

Consultation question 8a: How can these challenges be overcome to ensure market access?

3.5 Verifying sustainability claims with data

Part 2 of [Phase 1](#) will also assess key data points or datasets that lend themselves to the verification of sustainability claims or identify where reporting requirements may need to be synthesised into key data points or datasets to address any gaps.

Consultation question 9: What existing datasets are you aware of that can be used to support sustainability claims?

Consultation question 10: Are there industry-specific datasets that should be prioritised?

Consultation question 10a: Which industry-specific datasets should be prioritised?

Consultation question 11: In what ways can existing data collection processes be improved to support strong and credible sustainability claims (without adding significant workload to farmers and supply chain actors)?

Consultation question 12: How do international markets assess the credibility and strength of the data provided to support sustainability claims?

Consultation question 12a: What benchmarks or standards are used in this evaluation?

Consultation question 13: What new data collection methods are needed to meet emerging market demands?

4 Make a submission

We invite industry, business and the community to contribute knowledge and views on current and emerging expectations from international markets for providing evidence for sustainability claims.

4.1 Have your say

You can contribute by:

- responding to the discussion paper questions through the online survey
- uploading a written submission.

If you are providing a written submission on behalf of an organisation, it must be on an official letterhead. For written submissions that are longer than 3 pages, please include a summary of key points.

Make a submission via [Sustainability claims for international markets](#).

Responses to this public consultation will close at 5pm AEDT on Monday 24 February 2025.

4.2 Next steps

The ASCWG will consider all submissions.

The ASCWG will use the learnings gathered through [Phase 1](#) desktop research, interviews and this consultation process, to inform development of a final discussion paper during [Phase 2](#).

The final report is expected to be delivered in late 2025.

4.3 Contacts

For information about this discussion paper, email credentials.innovation@aff.gov.au.

Glossary

Term	Definition
AASF	Australian Agricultural Sustainability Framework
Agriculture	The science or practice of farming, including cultivation of the soil for the growing of crops and the rearing of animals to provide food or other products. ISO 20670:2023(en), 3.3
ASCWG	Australian Agricultural Traceability Assuring Sustainability Claims Working Group
AATDSWG	Australian Agricultural Traceability Data Standards Working Group
AWSS	Australian Wool Sustainability Scheme
APEC	Asia-Pacific Economic Cooperation
CBAM	Carbon Border Adjustment Mechanism
Claim	State or assert that something is the case, typically without providing evidence or proof. <i>Source: Oxford Dictionary.</i>
Conformity	Fulfilment of a requirement. <i>Source: ISO 9000:2015, Quality management systems – Fundamentals and vocabulary.</i> Conformance is synonymous but deprecated.
Conformity assessment	Use of different techniques to determine a product, process, service, management system, person or organisation fulfils specified requirements. <i>Source: The ISO Council Committee on Conformity Assessment (CASCO).</i> Refer conformity assessment techniques.
Conformity assessment body	An entity that can undertake conformity assessment techniques and activities... such bodies act in a third-party capacity [e.g. third-party attestation], an important feature is that they have to act in an impartial way so that the results of their work can be objective and maintain the highest degree of confidence. <i>Source: The ISO Council Committee on Conformity Assessment (CASCO).</i>
Credential	Any form of verifiable (e.g. evidence-based) data or information that can be used to support claims made regarding sustainability (e.g. financial claims, product claims, process claims, system claims).
CSIRO	Commonwealth Scientific and Industrial Research Organisation
CSRD	Corporate Sustainability Reporting Directive
Data	Facts about an object. <i>Source: ISO 9000:2015 – Quality management systems – Fundamentals and vocabulary.</i>
Database	A collection of electronically stored descriptive records or content units (including facts, texts, pictures, and sound) with a common user interface and software for the retrieval and manipulation of the data. <i>Source: ISO 2789:2022 – Information and documentation.</i> Note 1 to entry: The units or records are usually collected with a particular intent and are related to a defined topic. A database can be issued on CD-ROM, diskette, or other direct-access method, or as a computer file accessed via dial-up methods or via the Internet. Note 2 to entry: Licensed databases are counted separately even if access to several licensed database products is affected through the same interface. Note 3 to entry: A common interface providing access to a packet of serials or digital documents, usually offered by a publisher or vendor, is also to be counted as database. Additionally, the single serials or digital documents should be counted as serials or digital documents.
Data dictionary	Listing of data elements (and their characteristics) that meets the information and functional needs of a system. ISO 22951:2009(en), 3.3
Data element	Single unit of data that in a certain context is considered indivisible. ISO/TS 21089:2018(en), 3.44

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Term	Definition
Data point	An identifiable element in a data set. <i>Source: Oxford Dictionary.</i>
Data set	A collection of related sets of information that is composed of separate elements [data points] but can be manipulated as a unit by a computer. <i>Source: Oxford Dictionary.</i>
Data term	A data term is typically a word or a phrase used to describe a concept or an entity within a specific business or data context. It represents an idea or a concept rather than a specific, quantifiable piece of data. The primary purpose of a data term is to provide a common language that can be used consistently – it aids in clear communication and understanding among various stakeholders.
DAFF	Department of Agriculture, Fisheries and Forestry
DCCEEW	Department of Climate Change, Energy, Environment and Water
ESG	environmental, social and governance A framework that helps stakeholders understand how an organisation is managing risks and opportunities related to environmental, social, and governance criteria (sometimes called ESG factors). ESG takes the holistic view that sustainability extends beyond just environmental issues. <i>Source: Corporate Finance Institute.</i>
EUDR	European Union Deforestation Regulation
evaluation	A conformity assessment technique or form of determination. The process of gathering evidence about whether a product, process or service meets specified requirements. Evaluation can include techniques such as testing, inspection and auditing. <i>Source: The ISO Council Committee on Conformity Assessment (CASCO).</i>
FAO	Food and Agriculture Organisation
FMCG	fast-moving consumer goods
GHG	greenhouse gas
greenwashing	False or misleading information, either intentionally or inadvertently, regarding the environmental or sustainability attributes of a product, asset and activity, which can have consequences on the assessment of financial and non-financial materiality (3.1.12). <i>Source: ISO 14100:2022(en), 3.1.15</i>
interoperability	The ability to move information easily between people, organisations, and systems. It enables a connected systems that share information securely, safely and without any special effort from the people and organisations involved. <i>Source: Australian Digital Health Agency.</i>
ISCC	International Sustainability and Carbon Certification
JAS	Japanese Agricultural Standards
metadata	Data about data. <i>Source: ISO 19115:2003</i>
MSC	Marine Stewardship Council
MLA	Meat and Livestock Australia
NFF	National Farmers' Federation
NGO	non-government organisation
principle	The fundamental statement about a desired outcome.
SAI	Sustainable Agriculture Initiative (platform)
SDGs	The United Nation's 17 Sustainable Development Goals .
SEC	United States Securities and Exchange Commission

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Term	Definition
standard	A document that provides requirements, specifications, guidelines or characteristics that can be used consistently to ensure that materials, products, processes and services are fit for their purpose. <i>Source: ISO.</i>
standards development organisations	Industry- or sector-based standards organisations that develop and publish industry specific standards. <i>Source: Standards Australia.</i>
sustainability	Maintenance of ecosystem components and functions for future generations, to address economic efficiency, social issues and environmental preservation.
system	Set of interrelated or interacting elements. <i>Source: ISO 9000:2015 – Quality management systems – Fundamentals and vocabulary.</i>
traceability	The ability to trace the history, application or location of an item. <i>Source: ISO 9000:2015 – Quality management systems – Fundamentals and vocabulary.</i> NOTE: When considering a product or a service traceability can relate to the origin of materials and parts; the processing history; or the distribution and location of the product or service after delivery.
traceability system	Totality of data and operations that is capable of maintaining desired information about a product and its components through all or part of its production and utilisation chain. <i>Source: ISO 22005: 2007 – Traceability in the feed and food chain – General principles and basic requirements for system design and implementation.</i>
third-party attestation	Certification in which a third-party issues a statement (e.g. a certificate) of conformity. <i>Source: The ISO Council Committee on Conformity Assessment (CASCO).</i>
UFLPA	Uyghur Forced Labor Prevention Act
verifiable credential	A tamper-evident credential that has authorship that can be cryptographically verified. Verifiable credentials can be used to build verifiable presentations, which can also be cryptographically verified. The claims in a credential can be about different subjects. <i>Source: W3C 2024a</i>
verification	Confirmation, through the provision of objective evidence, that specified requirements have been fulfilled. <i>Source: ISO 9000:2015 – Quality management systems – Fundamentals and vocabulary.</i> Note 1: The objective evidence needed for a verification can be the result of an inspection or of other forms of determination such as performing alternative calculations or reviewing documents. Note 2: The activities carried out for verification are sometimes called a qualification process. Note 3: The word ‘verified’ is used to designate the corresponding status.
validation	Confirmation, through the provision of objective evidence , that the requirements for a specific intended use or application have been fulfilled. <i>Source: ISO 9000:2015 – Quality management systems – Fundamentals and vocabulary.</i> Note 1: The objective evidence needed for a validation is the result of a test or other form of determination such as performing alternative calculations or reviewing documents. Note 2: The word ‘validated’ is used to designate the corresponding status. Note 3: The use conditions for validation can be real or simulated.

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