



QUEENSLAND  
FARMERS'  
FEDERATION



**Statutory Review of the Regulated Standards  
under the Reef Protection Regulations  
August 2025**

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**Prepared for**  
Office of the Great Barrier Reef

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Regulated Standards Statutory Review

Office of the Great Barrier Reef AND World Heritage Environment AND Heritage Policy Programs

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## Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- Canegrowers
- Greenlife Industry QLD
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallawa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

# About the Queensland Farmers' Federation

**The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.**

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

## Submission

The Queensland Farmers' Federation (QFF) welcome the opportunity to provide feedback on the environmentally relevant activity (ERA) standards (regulated standards), prescribed methodologies and guides, which are part of the Reef protection regulations for commercial sugarcane and banana cultivation in the Great Barrier Reef catchment.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

## Summary

Queensland's sugarcane and banana growers remain firmly committed to protecting the long-term health and resilience of the Great Barrier Reef. As active environmental stewards, they continue to invest in sustainable land management practices and innovation to improve water quality outcomes.

However, for this commitment to translate into practical, measurable results, the regulatory framework must evolve. Current standards are overly complex, rely heavily on outdated or modelled science, and place disproportionate focus on agriculture without recognising the diversity of farming systems or the voluntary efforts already underway.

QFF therefore recommends a targeted set of reforms focused on:

- Clarifying standards to make them outcome-based and practical for on-farm implementation.
- Strengthening the scientific foundation of regulations through the use of current, validated, and regionally relevant evidence.
- Removing unnecessary or ineffective requirements, such as the inclusion of phosphorus in the N&P budget and the use of crop yield to justify reduced nitrogen rates.
- And ensuring strong governance, economic viability, and continuous improvement through adaptive management.

Such measures are essential to achieving a balanced and credible regulatory approach, one that supports both the environmental integrity of the Reef and the long-term sustainability of Queensland's farming communities in the reef catchment.

## Recommendations

The following recommendations are put forth to achieve a more balanced regulatory framework.

### ***Clarity and Practicality of Standards***

- Clarify the language and structure of the standards and associated documentation; include practical examples and visual tools.
- Shift to outcome-based standards to provide flexibility in achieving environmental goals, tailored to each farm's context.
- Update record-keeping requirements to include only essential data that directly supports environmental outcomes and can be integrated with existing farm systems.

### ***Scientific evidence and methodological rigour***

- Use up-to-date, empirically validated science as the foundation of any regulatory decision-making, moving away from reliance on outdated models.
- Incorporate broader environmental science, including geoscience and catchment-wide nutrient source data, rather than focusing disproportionately on agriculture.
- Ensure all future regulatory changes are:
  - Underpinned by a clear scientific and risk-based rationale.
  - Aligned with existing BMP frameworks.
  - Reflected in Reef Credits modelling and other incentive systems.

### ***Remove all inferences to crop yield as a justification for reduced nitrogen rates***

- Remove all references that imply crop yield can be used to justify nitrogen rates below those recommended by the SIX EASY STEPS (6ES) nutrient management framework (developed by Sugar Research Australia).
- Acknowledge that District Yield Potential (DYP), used in 6ES, already incorporates validated agronomic research and is the appropriate basis for determining nitrogen requirements.
- Eliminate requirements and guidance that reference individual block yield.
- Maintain existing mechanisms that allow growers to justify higher nitrogen rates based on long-term yield data, without reintroducing yield as a justification for reductions.

### ***Remove phosphorus from the farm N&P budget***

- Remove phosphorus from the regulated Farm Nitrogen and Phosphorus (N&P) budget to simplify nutrient management and improve practicality for growers.
- Recognise that phosphorus is commonly applied as part of multi-nutrient fertiliser blends, and regulating it separately limits flexibility and may require costly customisation or equipment upgrades.
- Enable growers to focus on managing nitrogen without being constrained by dual caps that complicate fertiliser applications.

- Acknowledge that regulating phosphorus in cane farming is not scientifically justified.
- Removing phosphorus from the regulated budget would increase compliance, reduce unnecessary complexity, and ensure resources are better directed toward effective water quality improvements.

## Conclusion

Achieving effective Reef protection necessitates a balanced, practical, and scientifically robust regulatory framework that genuinely supports, rather than inadvertently stifles, the agricultural industry. It is an opportunity to ensure they are not only clear, fair, and evidence-based but also conducive to the continued profitability and sustainability of farming enterprises across the Great Barrier Reef catchment.

Yours sincerely

Jo Sheppard  
Chief Executive Officer



**This submission is provided by the Queensland Farmers' Federation**

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