

15 October 2026

Committee Secretary
Senate Select Committee on Productivity in Australia
PO Box 6100 Senate
Parliament House
Canberra ACT 2600



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Submitted by email: productivity.sen@aph.gov.au

To the Committee,

Re: Senate Select Committee on Productivity (Agricultural Red Tape)

The Queensland Farmers' Federation (QFF) welcomes this inquiry and wholeheartedly endorses its premise: farmers should be farming, not filling in forms.

Queensland farmers do not shy away from regulation. They meet legitimate obligations every day, and they take pride in producing food and fibre safely, ethically and sustainably. What they should not have to accept is a system that makes them prove the same thing again and again, to regulator after regulator, auditor after auditor, buyer after buyer.

That system is costing farm businesses dearly. The burden falls hardest on small family enterprises, where the owner or manager does the paperwork personally, often at the kitchen table after a full day's work. Every hour spent completing duplicate forms, keeping parallel records and preparing for yet another audit is an hour taken away from running the farm, investing in its future and being with family.

Farmers know exactly where this burden comes from, and QFF urges the Committee to hear directly from them. To support its deliberations, QFF highlights three areas where duplication is most acute: Commonwealth environmental approvals; horticultural assurance and accreditation; and agricultural and veterinary chemical regulation.

QFF calls on the Committee to recommend that the Australian Government:

1. Commission a comprehensive audit of the regulatory requirements imposed on farmers, and establish a farmer-led taskforce with the authority to act on its findings.
2. Drive mutual recognition and combined audits across assurance schemes, retailers and export authorities, and accept accredited industry programs as evidence of compliance with reef and environmental requirements.
3. Clarify how the Environment Protection and Biodiversity Conservation Act 1999 applies to agriculture and align it with Queensland approval processes, and ensure that APVMA processes are timely, predictable and proportionate.
4. Measure and publicly report the compliance burden on farmers, commit to a firm reduction target, and scale requirements to the size and risk profile of each business.

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Cotton Australia
Qld Fruit & Vegetable Growers
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1. Commonwealth environmental approvals

The EPBC Act operates alongside Queensland's vegetation management, environmental and planning legislation, and the two regimes frequently overlap. When undertaking routine land management, maintaining infrastructure or making changes to their operations, landholders are often unable to determine whether Commonwealth approval is required or how it interacts with state processes. As a result, they incur the cost of engaging consultants to obtain advice, prepare the same environmental information for more than one assessment, and await decisions without any clear timeframe.

QFF supports the protection of matters of national environmental significance. However, the approval process must be clear, proportionate and coordinated. QFF considers that the Australian Government should:

- Provide agriculture-specific guidance on when Commonwealth approval is required for routine works.
- Work with the Queensland Government to eliminate duplicate information requests and recognise relevant state assessments.
- Give landholders certainty regarding requirements and decision timeframes, including under new or amended legislation.
- Assess the cumulative effect of environmental obligations on farm businesses, rather than considering each obligation in isolation.

QFF further submits that the Committee should examine whether recent and proposed environmental reforms reduce duplication in practice or instead add to the complexity faced by landholders.

2. Horticultural assurance and accreditation

Horticulture shows how requirements that each make sense on their own can add up to something unworkable. Depending on their customers and markets, growers may need Freshcare, GLOBALG.A.P. and HARPS certification, ethical sourcing audits under Sedex/SMETA or Fair Farms, and separate environmental or sustainability reporting. As the Committee's own call for submissions noted, one banana grower in Innisfail is juggling eight such requirements while trying to run a farm.

These schemes largely ask the same questions about food safety, chemical use, traceability, pest management and workplace practices. Yet growers must record the answers in different formats, have them verified through separate audits, and submit them to multiple organisations. They pay for every scheme, and get no better outcome for it.

Most of these requirements come from private supply chains rather than government. But that does not let government off the hook. It is uniquely placed to bring industry, certification bodies, retailers and export authorities to the table and fix this. QFF is not asking for assurance requirements that protect food safety, workers or market access to be removed. It is asking that equivalent evidence be recognised once, not demanded many times over.

QFF recommends a process that would:

- identify the requirements common to existing schemes
- extend the recognition of equivalent audits and certifications
- standardise documentation so that growers are not asked repeatedly for the same information

- align government inspections and export assurance with established industry programs, ensuring a consistent approach across domestic and export markets.

This work should be informed from the outset by growers' own accounts of where duplication occurs and what measures would reduce it.

3. Agricultural and veterinary chemical regulation

Farmers rely on agricultural and veterinary chemicals to manage weeds, pests and diseases and to maintain animal health. The Australian Pesticides and Veterinary Medicines Authority (APVMA) is responsible for registering these products and determining their approved uses.

QFF supports rigorous assessment to protect human, animal and environmental health. Equally, approvals must be timely and transparent. Where applications are difficult to navigate, assessments are protracted or the same evidence must be generated more than once, the consequence is reduced access to valuable products. This is of particular concern for minor-use crops and for emerging pest and disease threats, where there is limited commercial incentive to pursue registration.

QFF considers that the Australian Government should:

- Ensure that APVMA processes and decision timeframes are transparent and predictable.
- Maintain fees and data requirements that are proportionate to the risk and intended use of each product.
- Make greater use of assessments undertaken by trusted international regulators.
- Improve pathways for minor-use and emergency-use products.
- Consult affected industries on the practical implications of any regulatory change.

Conclusion

QFF does not seek the removal of necessary safeguards. Its objective is regulation that is clear, proportionate and coordinated, so that farmers are not required to demonstrate compliance repeatedly to different organisations where equivalent evidence already exists.

QFF urges the Committee to recommend a systematic approach to identifying and removing regulatory duplication, informed by direct evidence from farmers and agricultural organisations. QFF would welcome the opportunity to appear before the Committee and would be pleased to facilitate its engagement with Queensland producers.

Yours sincerely,

Kylie Porter
Chief Executive Officer