

Submission to

The Queensland Government

On

**The Great Barrier Reef Water Science Taskforce
Interim Report**

FEBRUARY 2016

Queensland Farmers' Federation (QFF) is the peak body representing and uniting 16 of Queensland's rural industry organisations who work on behalf of primary producers across the state. QFF's mission is to secure a sustainable future for Queensland primary producers within a favourable social, economic and political environment by representing the common interests of its member organisations'. QFF's core business centres on resource security; water resources; environment and natural resources; industry development; economics; quarantine and trade.

Our goal is to secure a sustainable and profitable future for our members, as a core growth sector of the economy. Our members include:

- CANEGROWERS,
- Cotton Australia,
- Growcom,
- Nursery and Garden Industry Queensland,
- Queensland Aquaculture Industries Federation,
- Queensland Chicken Growers Association,
- Queensland Dairyfarmers' Organisation,
- Queensland Chicken Meat Council,
- Queensland United Egg Producers,
- Flower Association of Queensland Inc.,
- Pork Queensland Inc.,
- Australian Organic
- Fitzroy Food and Fibre Association,
- Pioneer Valley Water Co-operative Limited,
- Central Downs Irrigators Limited, and
- Burdekin River Irrigators Area Committee

Thank-you for the opportunity to make a submission to the Queensland Government on the Water Science Taskforce Interim Report. The report's recommendations must present to stakeholder's comprehensive and viable recommendations which recognise the Reef's value as an environmental and economic asset that supports communities and generates wealth.

A considerable proportion of QFF members are located in close proximity to coastal Queensland, with primary industries forming the predominant land use in the coastal zone.

Agricultural industries and farmers more generally are continuing to do their bit when it comes to implementing land management techniques that have been instrumental in reversing the long-term increases in sediment, nutrients and pesticides entering the reef. There is no avoiding the fact that the science indicates that there is further work to be done and industries have been proactive in their approach.

The QFF is generally supportive of the recommendations contained in the interim report, but maintains that with the current rate of the investment into the Great Barrier Reef (GBR), and the identified targets in Reef 2050 Plan may not be achieved to the standards implied by the Plan.

What is equally clear from the various GBR reports and stakeholder commentary is that if we are to make any real tangible long-term improvement in the health of the GBR lagoon, a quantum increase in investment and recovery actions toward improved GBR health over the next 10-20 years is required.

The QFF submission will outline specific comments on the Water Science Taskforce Report for the Taskforce to consider.

Specific comments on the Water Science Taskforce Interim Report:

| Principles | Category | Recommendations | Comments |
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| The Reef water Quality targets are ambitious but important | Targets | Recommendation 1 – Water quality targets | <p>Current GBR targets for improved water quality are based only on the desired ecological needs in the GBR lagoon. Furthermore, these ecological targets are often not reflective of sub regional water quality needs of the GBR, especially those within the inner GBR lagoon. Key influences toward the ability to realise desired ecological targets, such as socio-economic considerations, are not currently utilised in any investment matrix based on the solvability of improved water quality entering the GBR. Nor is any consideration made toward efficiency or effectiveness of program delivery or performance history made in allocating government investment toward the GBR and its catchments. Opportunity exists to include these additional parameters within additional business investment cases aligned to current regional delivery plans for Reef 2050.</p> <p>Evolving new reef science enables a timely target review. QFF note the current targets are aspirational and should not reflect poorly on the work industry has undertaken over many years to improve water quality. QFF support a review of the targets and establish regional targets for all pollutants across the GBR catchment.</p> |
| A mix of tools are needed, not just one tool | Incentives and market approaches | Recommendation 2 – Incentives and market approaches | <p>QFF notes concessional loans are in the mix of potential market approaches. QRAA currently manage concessional loans in Queensland. Are they being flagged as managers for this to reduce duplication and cost?</p> <p>QFF asserts that any Reef Loan concept typical barriers/risks include:</p> <ul style="list-style-type: none"> • Transaction costs – wide geographic distribution, diversity of farm operations and low farm revenue • Credit risk technical – water quality projects can be complex for financiers to address, banks don't have data on these types of projects and cash flow from these types of projects are not conventional revenue based projects • Credit risk financial – credit risks of farms exposed to seasonal variability, level of farm indebtedness, low collateral value of water quality projects compared with projects generating direct productivity gains, longer pay back periods <p>QFF recommends future research is focussed on how to address the constraints within the context of the Reef 2050 Plan.</p> |

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| | | | The recommendations outlined in this section require further clarification and further research to ensure outcomes delivered do not impose unintended consequences on farmers, environment and communities. |
| | Regulation | Recommendation 3 – Staged introduction of more outcomes-based regulations | <p>The QFF recommends the Government should avoid further implementation of the current reef regulations which were made law under the EP Act. QFF asserts that the Government continue to support systems that recognize and encourage proactive management on farm best management programs and indeed reward subsequent improvement in regional water quality.</p> <p>If landholders are not meeting their minimum environment standard then there is a place for outcomes based regulations. Any regulation’s imposed should only impact those that are not meeting the minimum environmental standards under the EP Act. QFF does not support any red tape imposed on farmers meeting and exceeding industry defined best practice.</p> |
| | Extension | Recommendation 4 – More effective, targeted and coordinated extension | <p>QFF sees this as a recommendation to invest in extension to improve Reef water quality outcomes critical to the evolution of a legacy of improved capacity and networks across delivery organisations. Extension is seen as the key to support Reef –wide and cross industry learning ensuring to help target progress and achieve sustained behaviour change.</p> <p>Extension is a major activity undertaken by industry, NRM bodies and other professional service providers. It has been shown to deliver relevant direction and support most suited to individual and business circumstances, thereby maximising impact now and into the future.</p> |
| Smart delivery and much better communication will be critical to success. | Communications | Recommendation 5 – Improve communication and information | <p>QFF fully supports an integrated communication strategy. For implementation to succeed, it needs continued cooperation and a willingness to work together from all levels of government, non-government organisations, industry groups and community groups. These groups must strengthen existing initiatives and implement new cost-effective plans to protect the Reef.</p> <p>The Reef Alliance partnership is one of the cornerstones of success of the Australian Government Reef Programme. The model is successful because industry associations, regional NRM Groups and the conservation sector have much to contribute to improving practices for water quality outcomes and the synergies of the joint approach have been tremendous. The Reef Alliance continues to exist, supported by the leadership, coordination and communication functions with the Queensland Farmers’ Federation and the Queensland Regional NRM Groups’</p> |

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| | | | Collective. It is the maintenance of the partnership and continued investment in such will continue to support arrangements for implementation of regional and industry actions for the Reef 2050 Plan. |
| | Investment planning | Recommendation 6 – Strategic investment plan and partnerships | <p>QFF support the development of a strategic investment plan.</p> <p>If we are to make any real tangible long-term improvement in the health of the GBR lagoon over the next 10-20 years, it is clear from various GBR reports and stakeholder commentary that a quantum increase in investment is needed in both practice change and recovery actions to improve GBR health. Securing medium to long term investment plans for reef management has always been a difficult and fraught exercise in a highly politicised arena. However, this is critical to achieve the vision of the Reef 2050 Long-Term Sustainability Plan.</p> <p>Successive Federal and State governments have already made substantial investments in improving the health of the Great Barrier Reef, including through programs that help farmers improve land practices and deliver positive outcomes for water quality. That momentum must continue with ongoing and increased funding. The solutions must come with working collaboratively with farmers and supporting our vibrant agricultural industries of the north.</p> <p>Resourcing long-term reef management will require economic sustainability by all levels of government, reef-associated industries and coastal communities.</p> |
| | Knowledge, science and innovation | Recommendation 7 – Better align science and fund new ideas | <p>Unlike point source pollution where there are generally a small number of relatively identifiable sources, rural diffuse source pollution is much more difficult to deal with. Mobilisation of pollutants is often unobservable, or occurs as the result of irregular major rainfall events when the short time period and often extensive areas affected make monitoring difficult. The number of potential contributors to rural diffuse pollution is very large. The links between sources and (often remote) impacts can be hard to establish, making it difficult to decide what to measure, where to target solutions and what strategies are most appropriate.</p> <p>Unfortunately, the issue that has been central to the themes of the Government, Reef Plan and scientific consensus statement is that there has been a lack of scientific robust information. This has improved recently with data to demonstrate what the priority actions are within catchments, which will <u>directly</u> translate to an improvement in the quality of the water entering</p> |

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| | | | <p>the reef lagoon. This connectivity is demonstrated by water quality monitoring information. The management of this information lies directly with the State Government. It has been a fundamental and critical flaw in the way in which water quality data is managed in that very little, if any, is provided to land owners within relevant catchments, so that they can adjust their farm management practices based on actual information. The feedback loop of information is improving with farmers becoming more engaged in the problem, where it exists and solutions can be found for the greatest challenges. The lack of information flow as it stands keeps land holders and industry at arm's length and digs a divide between the science and the decision makers.</p> <p>QFF agrees that it is important to continue to trial and support innovative approaches. However, innovative practice trials and validation can require significant time to establish partnerships, capacity and momentum to achieve an ongoing cycle of practice change across the landscape. Additionally, some innovations, by definition, may fail, which must be considered an integral part of the project design. Outcomes have to be measured as learnings, not just successful outputs.</p> |
| | Monitoring, modelling and reporting | Recommendation 8 – Monitoring, modelling and reporting | <p>The QFF notes an integrated monitoring program is currently under development with the Australian Government. The QFF advocates a need to have more reliable modelling and monitoring frameworks. The focus under the Reef Plan and Reef 2050 for regional delivery partners is toward the capacity to prioritise and maximise public investment to derive maximum water quality and community benefit. The capacity to do this requires access to modelling and monitoring information, which is sub-regional in spatial scale and aligned to NRM and community user needs. To date this has not been achieved, despite an agreed interest from all sector stakeholders. QFF would hope that any further investment in integrating the Queensland Government's numerous monitoring programs would involve further investment into water quality monitoring in coastal catchments with more robust science.</p> |
| | Governance | Recommendation 9 – Simplify governance | <p>QFF strongly believes there is a need to ensure any recommended improvements in Governance deliver, whilst taking into account new threats that may emerge over time and ensuring management of these threats is balanced and integrated with existing initiatives and management. The next couple of years are critical in demonstrating effort and targeted outcomes, so an appropriate framework will be imperative in influencing the future of the Great Barrier Reef lagoon.</p> |

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| | | | <p>The Reef 2050 Plan needs to stream line current governance for all things GBR within a structured “line of sight” hierarchy framework– Current arrangements see three (3) Australian government departments (one is an authority) and five (5) State government departments supporting direct operations in the GBR. It is evident to the QFF that the GBR program is not a coalition (team) of partners but rather a team of individual organisations each with a role and function as determined by their own values, needs and requirements. Opportunity exists to refine, strengthen and align purpose, values and operations via redefined management structures, which integrate actions from local community scale to GBR scale. For example GBR wide land practice, land condition and water quality improvement targets based on a sound understanding of what the water quality improvement targets should be for each sub-region in the GBR aggregating to give a GBR wide picture and set of targets and delivery priorities.</p> |
| <p>Bring it all together in a few areas will provide an important demonstration of impact</p> | <p>Major projects</p> | <p>Recommendation 10 – Two major demonstrator projects</p> | <p>QFF is supportive of the concept of implementation of two major demonstrator projects. A concern is the time lag in outcomes from these projects being extended. There is a commitment to invest significantly in other recommendations from the taskforce recommendations and these projects need to be integrated to ensure a greater return on investment.</p> |

Conclusion

The Great Barrier Reef is a complex ecosystem influenced by interactions between catchment runoff and large-scale natural events. Marine water quality is influenced by currents, winds and waves as well as rainfall pattern and river loads. Over time, new technology and science will help us further understand the main network of factors contributing to reef health which may extend beyond current highlighted factors such as over-fishing, agricultural land use, coastal development and port dredging.

Agriculture has a committed seat at the table to strengthen existing initiatives and implement new plans as well to protect the reef. Farmers across the State have already stood up to be counted on this issue. The QFF believes time will prove agriculture's commitment to the job at hand, but for the overall health of the reef we need all stakeholders to continue this crucially important work.

The QFF appreciates the opportunity to comment on the Interim Report. The QFF is committed to working with the Queensland Government in the implementation of the recommendations from the water science taskforce report and subsequent initiatives which improve the quality of water entering the Great Barrier Reef. If you require further information, please contact QFF Environment and NRM Policy Advisor *Adam Knapp* on (07) 3837 4747.

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