



QUEENSLAND FARMERS' FEDERATION

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Submission

11 October 2016

Dr Chris Hill
Director Industry and Development
Industry Sector Regulation and Support
Department of Environment and Heritage Protection
Level 8, 400 George Street
BRISBANE QLD 4001

Via email: ISRS.Consultation@ehp.qld.gov.au

Dear Dr Hill

Re: Draft General Beneficial Use Approval (ENBU06949016) for the use of Biosolids

Thank you for your correspondence dated 19 September 2016 advising the Queensland Farmers' Federation (QFF) that the Department had developed a Draft General Beneficial Use Approval (BUA) for the use of Biosolids as a resource under the *Waste Reduction and Recycling Act 2011 (WRR Act)*. QFF notes that the consultation period closes on 12 October 2016 and therefore QFF wishes to record that not all of its members have had opportunity to fully consult with their memberships on the new Draft General BUAs.

QFF is the united voice of intensive agriculture in Queensland. It is a federation that represents the interests of 17 of Queensland's peak rural industry organisations, which in turn collectively represent more than 13,000 primary producers across the state. QFF engages in a broad range of economic, social, environmental and regional issues of strategic importance to the productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland primary producers by representing the common interests of our member organisations:

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

The united voice of intensive agriculture



QFF supports the beneficial application of biosolids where agricultural value can be realised. Biosolids are currently utilised across a range of agricultural industries and QFF believes that their beneficial application will increase where there is proven agronomic and productivity benefits.

Whilst QFF acknowledges that the proposed Draft General BUA closely reflects the existing Arkwood (Gloucester) Pty Ltd [ENBU04614013] Approval, the following conditions within the Draft General BUA are not reflective of current practice and will present operational complexities:

- Clause 31 (b) of the Draft General BUA states that the resource must not be applied to land that is located within a 1 in 100 year flood zone. Agriculture is by far the most extensive land use on floodplains in Queensland and much of the State's most productive agricultural land lies on floodplains¹. The fertility and productivity of the land depends largely on the nutrients and organic matter contained within the topsoil and floods can easily strip away the valuable topsoil layer exposing the compacted subsurface soil¹. The risks posed by the application of biosolids to land subject to 1 in 100 year flood would be addressed in Clause 22 (written procedures relating to the use of the resource) of the Approval.
 - QFF requests the removal of Clause 31 (b) from the Draft General BUA before its finalisation.
- Clause 31 (d) of the Draft General BUA states that the resource must not be applied to land that will be used for poultry or pig grazing. This is in addition and contradictory to the requirements outlined in Table 7 of the same approval where 'animal grazing' is permitted from 30 days after resource application. Table 7 of the Draft Approval is consistent with the current Arkwood (see Table 3) and NuGrow Roma Pty Ltd (ENBU05029013) (see Clause 24) Approvals.
 - QFF requests the removal of Clause 31 (d) from the Draft General BUA before its finalisation.
- Clause 35 states that 'the resource must be spread on land at a uniform rate and incorporated into the soil within six (6) hours of spreading'.
 - QFF does not support the reduction in time for the required incorporation of biosolids into the soil from 36 hours to six (6) hours, however, is supportive of the inclusion of a timeframe for incorporating biosolids into land.

The current NuGrow Approval does not specify a time for incorporation of biosolids into land. Whereas, the current Arkwood (Gloucester) Pty Ltd [ENBU04614013] Approval, states 'The resource is spread at a uniform rate across the application area and incorporated into the soil as soon as practicable after spreading but in all circumstances within 36 hours of spreading' (see Clause 19).

- QFF supports the substitution of Clause 19 from the current Arkwood (Gloucester) Pty Ltd [ENBU04614013] Approval in place of Clause 35 in the Draft General BUA.

These legislative changes under Chapter 8 of the *Waste Reduction and Recycling Act 2011 (WRR Act)* will come into effect on 8 November 2016 and will result in the replacement of the existing BUA framework with the new 'End of Waste' (EOW) framework. QFF notes that the Draft documents supplied to QFF still refer to the former BUA framework and, there is also a difference in the policy intent between a Beneficial Use Approval and an End of Waste Code which may require further consultation with stakeholders.

Finally, the letter from the Department (dated 19 September 2016) providing advice on the consultation for the Draft General BUA for Biosolids stated that "a number of local governments have expressed

¹ Department of Science, Information Technology and Innovation. (2015) Soil Conservation Guidelines for Queensland. Chapter 10: Land Management on Floodplains.

concerns regarding the economic constraints associated with regulated waste transport in relation to offsite reuse and disposal of Biosolids. A general approval to use Biosolids as a resource for application to agricultural land as a soil conditioner or fertiliser would minimise costs for local governments and their rate payers, providing that the waste is used as a resource for the purpose of the beneficial use as approved”.

- QFF does not support the policy position adopted by the Department in its letter and the rationale which has clearly led to the Department’s decision to replace the existing Specific BUAs for biosolids with a General BUA.

QFF notes that there is inconsistency between the Specific BUAs for biosolids and welcomes the streamlining of conditions into a General BUA. However, the application of biosolids to agricultural land must only occur when the biosolids meet the ‘resource’ specifications and, in addition, are fit-for-purpose and safe for the agricultural application they are being used for. The application of biosolids to land primarily as a method for local governments to reduce costs for their rate payers is environmentally reckless and may adversely impact soil nutrient levels, soil health and soil biology, resulting in long-term damage to agricultural lands and food health concerns.

Currently, biosolids are typically supplied by the larger generators from ‘modern’ facilities. QFF is concerned about the acceptance and use of biosolids generated from smaller, regionally operated sewage treatment plants which, for equity, will include private facilities (such as caravan parks and those co-located on industrial facilities); particularly where they may be impacted by fluctuations in population and/or industrial activities, resulting in variabilities to operational conditions and inconsistent waste streams.

QFF also recognises that the costs associated with appropriate and statistically significant sampling to classify the biosolids correctly may not occur in organisations where costs (associated with the generation of biosolids) are a primary concern.

QFF does not support the ‘dumping’ of biosolids to agricultural land under any circumstances.

If you require further clarification or have questions about this submission, please contact Dr Georgina Davis on (07) 3837 4727 or email georgina@qff.org.au.

Yours sincerely

Travis Tobin
Chief Executive Officer