



QUEENSLAND FARMERS' FEDERATION

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Submission

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Reef Regulations Discussion Paper Submission
Office of the Great Barrier Reef
Department of Environment and Heritage Protection
GPO Box 2454
BRISBANE QLD 4001

Via email: officeofthegbr@ehp.qld.gov.au

Dear Sir/Madam

Re: Submission to the *Enhancing regulations to ensure clean water for a healthy Great Barrier Reef and a prosperous Queensland* discussion paper

The Queensland Farmers' Federation (QFF) is the united voice of intensive agriculture in Queensland. It is a federation that represents the interests of 15 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
- Central Downs Irrigators Limited
- Bundaberg Regional Irrigators Group
- Flower Association of Queensland Inc.
- Pioneer Valley Water Board
- Pork Queensland Inc.
- Queensland Chicken Meat Council
- Queensland United Egg Producers
- Australian Organic.

QFF welcomes the opportunity to comment on the *Enhancing regulations to ensure clean water for a healthy Great Barrier Reef and a prosperous Queensland* discussion paper. QFF provides this submission without prejudice to any additional submission provided by our members or individual farmers.

The united voice of intensive agriculture



General comments on the discussion paper:

QFF understands that the policy objectives of the discussion paper are to broaden and enhance the existing reef protection regulations to limit or stop the most polluting practices from land-based activities in the Great Barrier Reef (GBR) catchments.

The discussion paper proposes a broadening of regulation in the reef catchments and has again raised the important question of balancing the perceived success and realities associated with regulatory schemes of this nature.

Governments sometimes view regulation as a relatively easy option. QFF and its member organisations acknowledge and accept that there is a need for effective regulation. QFF supports effective, well-targeted regulation (smart regulation), but it is a blunt instrument that supports minimum standards of compliance at the expense of true practice change, and it does not encourage a culture of innovation and excellence.

Extending regulation to include the banana, horticulture and grains industries while increasing the regulatory standards that already apply to sugarcane and grazing has understandably been met by the agriculture sector with a mixture of resignation and frustration.

In August 2016, the government agreed to implement all 10 recommendations from the Water Science Taskforce Report. However, there is frustration that the underlying principle of industry-led Best Management Practice (BMP) programs seems to have been dismissed.

Farmers who voluntarily engage in industry-led BMP programs own their outcomes and the impacts they are having on their local area and the GBR. It is widely accepted that the best way to achieve real practice change is through leading by example, incentivising people and giving them a sense of ownership towards the change.

Even though the government acknowledges in principle the work already achieved through these programs, it seems to have failed to understand why and how these programs were able to achieve the results they did and how the using them as 'quasi regulation' may impact their effectiveness.

The rationale for regulation seems to be based on a view that practice change is too slow. However, any social change takes time and during the three years 2013-16, more than 2,000 farmers changed their land management practices – this equates to over 1.33 million hectares in the reef catchments. Farmers are also investing heavily. On average, for every \$1 spent by government, farmers have invested \$1.55.

Governments must also accept that their current level of investment does not come close to reflecting the true cost of achieving the water quality targets they have set. Various independent estimates using different methodologies have identified an investment gap of hundreds of millions of dollars per year. If governments are serious about continual improvement in industry's impact on the reef, there must be long term, adequate investment in BMP programs and water quality improvement projects.

QFF reminds the department that perverse outcomes arise from regulation that is not warranted or appropriately targeted, and when it is not well communicated or clearly understood. The collective benefits of regulation must outweigh the collective costs of doing so.

Agriculture is worth over \$5 billion in the reef catchments. It supports more than 40,000 jobs, underpins many catchment communities and has a strong and profitable future alongside the reef. QFF and members remain principally opposed to regulating agricultural practices in the reef catchments.

Specific comments to questions in the discussion paper:

1. *Do you have suggestions for minimum practice standards?*

QFF maintains that voluntary, industry led farm management systems (including, but not limited to BMP programs) are the best way to deliver improved water quality outcomes. These programs help farmers benchmark their businesses against the best industry standards using the best available science. These programs are gaining wider industry adoption as voluntary methods to demonstrate continuous improvement and environmental stewardship.

Firstly, government must recognise that the evolution of industry specific BMP programs has been different. Working with each agricultural industry over the next year to determine the minimum practice standards and understand the time and investment that would be required is critical. Any regulatory decision would need to be underpinned by science and have peer acceptance.

2. *How long should each industry be given to meet the new minimum standards once they have been determined?*

QFF supports the inclusion of proposed timeframes to be set in legislation as to when the regulated standards will come into effect, if consideration to each industry's ability to realistically meet these is considered as this will vary per industry. The government must also commit to resourcing industries to reach a minimum standard.

3. *What data should be collected by producers, industry and government?*

The collection of data is critical to the achieving the outcome the government is striving for but this needs to be agreed with each agriculture industry impacted. QFF maintains that government needs to provide more clarity around the purpose of collecting the data and how it would be used. If clarity around those questions can be obtained, then the agriculture sector can work with government on the most appropriate and achievable options.

4. *How best can records be collected and made available to support producers and industry?*

The answer to this question will depend on which industry and what data. QFF reiterates the detail needs to be worked out with each agricultural industry impacted by any scaling up of the current regulations.

5. *What incentives or assistance might best encourage compliance with minimum practice standards?*

Incentives that enable farmers to upgrade or modernise their farming system are widely well received and have proven to be effective. Ideally, any incentivisation programs will be about outcomes and not about political elections. Investment in large scale projects, such as the Reef Alliance Project (<http://www.qff.org.au/projects/reef-alliance/>), that leverage established capacity and industry networks should continue.

6. *How could good performance by producers be best rewarded?*

The government should focus on promoting good news stories from famers and their investments. QFF suggests that the public (media) discussion is too focussed on bad and sensationalistic news. The success and good work of thousands of farmers often goes unnoticed. This needs to change.

7. How often should catchment pollution load limits be reviewed to determine whether load limits are being exceeded?

QFF suggests pollution load limits be reviewed quarterly as different seasons create different conditions and this needs to be analysed. Policy makers have demonstrated a lack of understanding of agricultural systems, and the definition of intensification and rotation complexities has not been addressed. There is also a lack of detail on and confidence in the catchment pollution load limits framework.

8. What other decisions could catchment load limits help inform?

The discussion paper suggests that catchment pollution loads could also be used to inform government decisions when planning for sustainable, long-term growth of the agricultural sector in Queensland. Further detail on how this would be used is needed.

9. What types of new agricultural activities should be subject to the additional requirements?

There is a general lack of detail in the discussion paper about defining types of new agricultural activities and intensified agricultural activities. QFF supports the notion that only agricultural activities with a high risk of increasing pollutants are captured and this will only be done in consultation with industry.

10. Should new water quality requirements apply only to new agricultural, urban and other intensive activities in those reef catchments that are exceeding or close to exceeding their catchment pollution limit or should they apply across all reef catchments?

QFF maintains that any new water quality requirements apply only to new activities that are exceeding or close to exceeding their catchment pollution limit.

11. Can you foresee any circumstances where an offset would be inappropriate?

No. However, QFF notes that to date there has been a lack of clarity provided around offsets and how they could realistically be achieved.

12. How could financial contributions be determined?

QFF supports a recognised panel with an independent chair to identify suitable projects for strategic pollution reduction.

13. Is the proposed order of preference for where an offset should be located appropriate?

Yes.

Concluding comments:

Like all Australians, farmers want to ensure the GBR is protected and preserved for generations to come. QFF reminds the department that the impact of land-based activities on the GBR is the sum of all industries operating in the reef catchments, and that even smart regulation is a blunt instrument that supports minimum standards of compliance at the expense of true practice change. Any government intervention must ensure it is outcome-focused, and that outcome must address the sum of all activities.

The best way for the sum of all agricultural activities to achieve a positive outcome is by having as many farmers as possible adopting a culture of innovation and excellence.



Regulation has never proven to be the catalyst for creating a culture of innovation and excellence, so it is likely that it will not realise the outcome sought.

Voluntary, industry led farm management systems (such as BMP programs) and other water quality improvement projects have proven to be enablers of such a culture. However, funding for these activities has not been as coordinated or strategic as it should.

QFF and members look forward to working with government and industry to ensure that our sector continues to do its bit to deliver on community expectations.

Yours sincerely

Travis Tobin
Chief Executive Officer