



QUEENSLAND FARMERS' FEDERATION

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Submission

26 May 2017

Ms Gillian Tait
Senior Policy Advisor
Department of Environment and Heritage Protection

Via email: gillian.tait@ehp.qld.gov.au

Dear Ms Tait

Re: Draft Guideline - Waste Feedstocks under the Liquid Fuel Supply Regulation 2016

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 Irrigators
- Central Downs Irrigators Ltd
- Bundaberg Regional Irrigators Group
- Flower Association
- Pioneer Valley Water Cooperative Ltd
- Pork Queensland Inc.
- Queensland Chicken Meat Council
- Queensland United Egg Producers
- Australian Organic.

Thank you for the opportunity to provide feedback on the above working document. QFF provides the following comments without prejudice to any additional submission provided by our members or individual farmers:

The united voice of intensive agriculture



- Figure 1 – Reference to the BUA or EoWC/EoWA is incorrect. If a resource has a BUA or EoWC then it is not a waste. Figure 1 incorrectly identifies these resources as a waste. Suggest omitting this box/reference.
- The feedstock classification section and Table 2 – provide little clarification or assistance. Some of the determinations appear inconsistent for example, the classification of trash from sugar cane harvesting, straw and cotton gin residues. QFF suggests that these agricultural products be omitted from classification.
- This document must be continuously maintained in line with the pending RIS which reviews the ERAs and regulated waste framework. QFF will be advocating for the reclassification of agricultural resources during this review.
- Please be advised that there is a planned deployment for a biological control to eradicate prickly acacia. Agricultural feedstocks will potentially rise and diminish seasonally and will be subject to biosecurity protocols. As such, rationalising some/all/a few of them (even for the purpose of providing examples) may lead to confusion. It is therefore essential that this document and similar are developed with input from the agricultural sector and the relevant Department of Agriculture and Fisheries personnel.

We look forward to working with the Department to advance the objectives of, and opportunities arising from the Biofutures Roadmap.

Yours sincerely

Dr Georgina Davis
Senior Policy Advisor, Resources