



QUEENSLAND FARMERS' FEDERATION

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Submission

26 June 2017

Reef Regulations Consultation 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 *Regulatory proposals for enhancing Great Barrier Reef protection measures across agricultural activities* consultation paper

The Queensland Farmers' Federation (QFF) is the united voice of intensive agriculture in Queensland. It is a federation that represents the interests of peak state and national agriculture 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.

QFF welcomes the opportunity to comment on the *Regulatory proposals for enhancing Great Barrier Reef protection measures across agricultural activities* consultation paper (the consultation 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

In August 2016, the Queensland Government agreed to implement all 10 recommendations from the Water Science Taskforce Report (2016). Recommendation 5 proposes the implementation of staged regulations to reduce water pollution throughout the Reef Regions.

In April 2016, QFF submitted comments to the government in response to the 'Enhancing regulations to ensure clean water for a healthy Great Barrier Reef and a prosperous Queensland discussion paper'. Some of the concerns and suggestions raised in that submission have been addressed in the consultation paper; however, a number remain outstanding. Many of the unaddressed comments are still relevant and will be reiterated in the context of the consultation paper.

QFF and its members remain principally opposed to the regulation of agricultural activities as described in the consultation paper. Regulation is a high cost, blunt instrument that supports minimum standards of compliance at the expense of true practice change, and it does little to encourage a culture of innovation and excellence.

The consultation paper highlights activities that, if implemented, will likely stifle growth within several agricultural industries. If industries are to adapt and grow to changing markets and demands, innovation and intensification need to be encouraged and supported, not suppressed.

There is considerable rhetoric that describes the uptake of voluntary best management practices (BMP) as being 'too slow' and that other activities, such as regulation, needs to be implemented. However, it is not clear what the expected trajectory of uptake is, nor what it is being compared against to know that it is too slow. Continuing to comment that uptake is too slow without robust reasons, targets or comparisons is not helpful, nor is it potentially true.

In the event the government is committed to employing regulatory measures for agricultural activities, industry needs to remain at the table and our concerns and suggestions need to be considered and addressed. In relation to the consultation paper, QFF and its members:

Commercial agricultural operators

- Support option 1 under the heading 'What activities need to meet the minimum standards'. However, the government needs to acknowledge that there may be non-commercial operators in certain catchments that are also having an impact. In these instances, it is important to have appropriate mechanisms in place that identifies high polluting catchments and their source, and a method that can be implemented to reduce impacts from all users, not just commercial operators.

Minimum standards

- Are satisfied with the identified with the proposed government and industry pathways to meet minimum regulatory standards.
- Support the proposed timeframes (to be set in legislation) outlining when the regulated standards will come into effect. The government must also commit to resourcing industries to reach a minimum standard.
- Support the notion that agricultural operators accredited through recognised industry programs won't be the focus of government compliance activities. However, linking BMP programs to regulation may reduce their attractiveness to farmers and consequently the effectiveness of these programs.
- Support the removal of the requirement to have an Environmental Risk Management Plan (ERMP) from the Act. Current ERMP provisions are ineffective, difficult and costly to implement.

New agriculture activities

- Are concerned with the definition of new agriculture activities. Any new water quality requirements should only apply to new activities in catchments that are exceeding or close to exceeding their pollution limit. Any regulation for new agricultural activities will need to explicitly detail:
 - what 'new' means and what activities may be considered a new agricultural environmentally relevant activity (ERA)
 - the process for self-assessment, notification, approval and compliance.
- Support that a material increase in the amount of fertiliser applied to the land excludes: the commencement of crop rotation or crop sequencing or changes in the extent or type of crop rotation or crop sequencing.
- Support the exclusion of crop rotation activities. However, irrigation applied to the land should also be excluded.
- Do not support the definition of proposed activities as it does not encourage the intensification of agriculture. This is where most industries will need to move in the future to ensure limited/scarce resources are being used as efficiently as possible.
- Do not support the stipulation that farming on land that has been out of production for five years (regardless of the size of the activity) is considered a new Agricultural ERA. The reasoning behind the five-year parameter needs to be backed by robust evidence as this stipulation has the potential to limit diversification and farm viability.
- Do not support the rounding down of minimum land from 39 hectares (ha) to 30ha. QFF accepts the thresholds were based on historically available information on average farm size, but in most industries farm size is increasing as economies of scale are realised. It would therefore be more appropriate to 'round' 39ha to 40ha.
- Support new agricultural activities following a self-assessment process but require clarity around the timing of notification of new agricultural activities the paper does not provide this detail.
- Without more detail on the offsets framework and how this might work in practice, are unsure whether to support option 1 or option 2 in relation to the question: Which catchments should be targeted for water quality offsets.

Offsets

- Do not support water quality offsets as they are described due to insufficient information within the consultation paper. Further information as to how offsets can realistically be achieved is requested.
- Request that the government employs an effective, transparent and robust process to develop a practical and logical water quality offset framework.

Concluding comments

QFF and its members do not support the regulation of agricultural activities as described in the consultation paper. Agricultural regulation has never proven to be the catalyst for creating a culture of innovation and excellence. 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. Implementation of the activities outlined in the consultation paper has the potential to significantly stifle the sector's growth by limiting intensification and innovation.

QFF and members look forward to working with government and industry to ensure our sector continues to do its bit to deliver on community expectations and protect and maintain the intrinsic values of the GBR catchment and lagoon.



If you require further clarification or have questions about this submission, please contact Adam Knapp on (07) 3837 4720 or email adam@qff.org.au.

Yours sincerely

Travis Tobin
Chief Executive Officer