



QUEENSLAND FARMERS' FEDERATION

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Submission

10 October 2017

Draft Reef 2050 Water Quality Improvement Plan
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: Draft Reef 2050 Water Quality Improvement Plan 2017-2022

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 farmers by representing the common interests of our following member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland (NGIQ)
- Queensland Chicken Growers Association (QCGA)
- Queensland Dairyfarmers' Organisation (QDO)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Bundaberg Regional Irrigators Group (BRIG)
- Flower Association
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Pork Queensland Inc.
- Queensland Chicken Meat Council (QCMC)
- Queensland United Egg Producers (QUEP).

QFF welcomes the opportunity to provide comment on the draft Reef 2050 Water Quality Improvement Plan (WQIP). QFF understands this feedback will be used to inform the finalisation of the plan, as well as development of detailed implementation planning.

The united voice of intensive agriculture



General Comments

QFF supports aligning the WQIP with the Great Barrier Reef 2050 Long Term Sustainability Plan and the expanded scope of the WQIP, which now addresses all land-based sources of water pollution, including from urban, industrial and public lands. Queensland agriculture acknowledges and accepts the role it must play in the reef recovery effort, but QFF highlights that for some time, climate change has been identified as the greatest threat to the long-term health of the Great Barrier Reef (GBR). Climate change is already affecting the Reef and is likely to have far-reaching consequences in the decades to come.

There is widespread agreement among experts that the current level of government investment is insufficient to achieve the ambitious water quality targets that the Australian and Queensland Governments have set. Long-term strategic investment will be required to reach the new end of catchment targets, and investing in agriculture is an investment in regional economies and jobs.

The ability to provide further input on the best approaches for meeting the government's new end of catchment water quality targets will be important. Involving industry and natural resource management (NRM) organisations is key to effective and efficient delivery of land practice change and the resultant water quality improvement.

Previous Reef Plans have been under resourced and set targets that did not have milestones and actions capable of delivering the targets. It is therefore important that this plan sets key performance indicators (KPIs) that are clear and measurable.

Specific Comments

Building on past achievements and current level of funding

Preserving the GBR and building its resilience to mitigate threatening processes is a key national and international concern. Farmers in the GBR catchments have been and continue to reduce their impact on the Reef through improved land management practices. Industry-led Best Management Practice (BMP) programs, or similar farming systems programs, are a structured and successful pathway for realising improved farm management practices.

Over the last eight years, these voluntary programs have supported farmers to gain a better and more complete understanding of their business and adopt improvements. Long term government investment in these programs is essential to continue improving the quality of water entering the GBR.

Water Quality Targets

The 2017 Scientific Consensus Statement underpins the new water quality targets that have been set for the 35 catchments. In the WQIP, these targets are stated as anthropogenic end-of-catchment loads for Fine Sediment, Dissolved Inorganic Nitrogen, Particulate Nitrogen and Particulate Phosphorus. QFF support the development of the catchment load targets as they are based on a significant body of science, research and expertise.

However, it must be acknowledged and accepted that without appropriate levels of strategic investment, the targets will not be met. The current misalignment will set agricultural industries and water quality programs up to fail.

The current level of funding invested to protect the GBR is grossly inadequate to meet the targets. In 2016, an independent Queensland Government report (the 'Alluvium Report') estimated the costs of achieving the water quality targets by 2025 at \$8.2 billion.

QFF, in partnership with the Queensland Tourism Industry Council and WWF also commissioned an independent report (the 'Jacobs Report') to determine the appropriate level of government investment if the Reef was treated as a productive piece of infrastructure. Based on accepted regulatory economic principles, the Jacobs Report conservatively estimated the GBR asset value at \$21 billion, which should receive at least \$547 million a year for operations and maintenance, or \$830 million a year if a depreciation allowance is included.

In June 2017, a Deloitte Access Economics report calculated the economic, social, icon and brand value of the Great Barrier Reef to be \$56 billion. The Deloitte Report did not make any recommendations about investment priorities or quantum, but it provides a new dimension to the Jacobs work if you accept a 'reef regulated asset' value of \$56 billion. QFF has not revised the Jacobs annual investment calculations based on a \$56 billion value, but it is fair to conclude the annual allowance for operations and maintenance (and depreciation) would be substantially more.

Essentially, governments have two options if they are serious about realising the set targets, either: 1. significantly increase investment (both in quantum and term); or 2. amend the targets to reflect what is possible given the current level of investment.

Actions to progress towards targets

Previous Reef Plans have failed because they were under resourced and did not have clear and measurable milestones and actions to deliver the targets. The new WQIP communicates the overall goals, but lacks detail on measurable actions to be undertaken. To improve the Annual GBR Report Card results, achievable KPI's need to be set.

Minimum Practice Standards

Regulation underpinned by minimum practice standards for water quality outcomes is proposed as part of the mix of tools to deliver on the targets. QFF strongly believes a conflict exists between minimum practices standards focusing on water quality outcomes and best management practices focusing on productivity and stewardship. QFF consider the industry led programs are the best mechanism to improve water quality, while maintaining the productivity and profitability of farmers. Industry BMP or similar programs comprise the industry best management practices that deliver on these criteria. They also deliver beyond the minimum practice standards, which aligns with the intent of the WQIP, and makes any proposed regulatory imposition unnecessary.

Conclusion

QFF support the overall objective of the WQIP and encourage the Queensland Government to continue to work proactively with agriculture industries to achieve the desired water quality outcomes and secure a profitable future for the sector.

QFF reiterates that delivering the level of pollutant reduction outlined in WQIP is an ambitious, challenging and expensive task. Resourcing long-term reef management will require economic sustainability by all levels of government, reef-associated industries and coastal communities.

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 reports and stakeholder commentary that a quantum increase in investment is needed in both practice change and recovery actions.

QFF and its industry members are aware that with the current level government financial support the ambitious targets outlined in the WQIP will not be realised, and the government is simply setting our industries up for failure.



There is a willingness from the agriculture sector to participate in a meaningful process. QFF looks forward to the opportunities for further input into the details around the actions and implementation of the prescribed actions.

QFF provides this submission without prejudice to any additional submission provided by our members or individual farmers.

Yours sincerely

Travis Tobin
Chief Executive Officer