



QUEENSLAND FARMERS' FEDERATION

Primary Producers House, Level 3, 183 North Quay, Brisbane QLD 4000
PO Box 12009 George Street, Brisbane QLD 4003
qfarmers@aff.org.au | 07 3837 4720
ABN 44 055 764 488

Submission

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Committee Secretariat
Standing Committee on Agriculture and Water Resources
Parliament House
CANBERRA ACT 2600
Via email: agriculture.reps@aph.gov.au

Dear Secretariat

Re: Inquiry into the impact on the agricultural sector of vegetation and land management policies, regulations and restrictions

The Queensland Farmers' Federation (QFF) is the united voice of intensive, semi-intensive and irrigated 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 farmers 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 member organisations:

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

QFF welcomes the opportunity to provide comment to the 'inquiry into the impact on the agricultural sector of vegetation and land management policies, regulations and restrictions' (inquiry). We provide this submission without prejudice to any additional submission from our members or individual farmers.

The united voice of intensive agriculture



Background

In Queensland vegetation and land management is a vexed, hyper-partisan issue. Since 1999 and through successive governments, state vegetation management policies have been driven by politics, resulting in ‘pendulum swing policies’ that over the long term, have not benefitted agriculture, regional communities or the environment. It has also created unacceptable levels of business uncertainty and reduced investment opportunities, and has severely eroded the trust and confidence farmers have in government and its departments around this issue. QFF has long held the view that an inclusive, objective and transparent consultation process that is based on science and evidence must be undertaken to realise a sensible and sustainable vegetation management framework for our state.

The brevity of this submission is not an indication of the importance of the issue, but as a state-controlled matter, most of the issues our sector currently faces around vegetation and land management must be solved at a state level. As such, this submission does not seek to respond to all the questions of the inquiry but singles out one ToR to highlight how governments must move past political agendas if they want to realise workable vegetation and land management policies that deliver for industries, communities and the environment.

The economic impact of vegetation and land management policies, regulations and restrictions

Following the passage of the *Vegetation Management and Other Legislation Amendment Act 2018 (Qld)* on 3 May 2018, the ability to obtain clearing permits for high value agriculture (HVA) and irrigated high value agriculture (IHVA) was removed. Ironically, the HVA and IHVA provisions were the most regulated part of the *Vegetation Management Act 1999*. Clearing could only occur if it was approved through a detailed government-assessed application process where many parameters had to be satisfied. Government also had the ability to adjust the approval parameters if it decided to increase or decrease the requirements a farm business had to meet before being granted clearing permission. Essentially, due to a highly politicised process, the HVA and IHVA clearing provisions were lost without enough scientific justification, consideration of the environmental implications for farm businesses and consideration of the economic impacts.

Lack of scientific justification to stop small, responsible clearing

Over the 4.5 years these clearing provisions were in place, there were 67 agricultural development approvals – 35 HVA and 32 IHVA¹. Together, these approvals will only result in 114,512 hectares being cleared for high value agriculture. To put that figure in context, that is only about 0.08 per cent of the area currently used for agriculture, and only 0.066 per cent of the land area of the state.

Considering IHVA only, 5,608 hectares – about 0.0039 per cent of the area currently used for agriculture, and only 0.003 per cent of the land area of the state – were approved to be cleared. Across irrigated agriculture, more than 76 per cent of these approvals were for 30 hectares or less.

Clearly, clearing for irrigated high value agriculture under these provisions was not being abused and it provided much needed flexibility for farm businesses struggling to maintain their international competitiveness. No scientific evidence to quantify what stopping this small amount of clearing would achieve, particularly in comparison to other similar sized clearing activities, was ever provided.

Lack of consideration of full environmental impacts

In dealing with urban encroachment, infrastructure developments, rapid growth of large-scale solar facilities, mining and landscape alterations from climate change, small-scale clearing is essential as it enables farmers to employ best management practices. Simply codifying the land where agriculture can occur while not accounting for the loss of high value agricultural land² leads to poorer land management

¹ Department of Natural Resources, Mines and Energy

² Queensland Land Use Mapping Program (QLUMP) demonstrates that since 1999, 113,690 hectares of ALC Class A and B land has been lost. In 11 of the 13 zones, the data is at least 2 years old. QFF estimates the actual loss of ALC Class A and B land is closer to 130,000 hectares.

decisions by farmers, as they are unlikely to retire and rehabilitate less suitable land if they cannot bring new land into production. This is compounded by the fact that many irrigated businesses will require farm redesign in (or prior to) 2020 when transitional and obsolete electricity tariffs are abolished. Current farm design is based on these eight agricultural tariffs, which will be replaced with demand based tariffs from 1 July 2020. Tariff trial work and modelling has shown that the new tariffs that farm businesses will be forced on to will substantially increase their already unsustainable electricity costs, in some cases by as much as 300 per cent.

Environmental considerations in the vegetation debate have largely had a single focus – how much land is being cleared. They have not considered that the high value agricultural footprint is shifting and shrinking, even though this is known, and vegetation regrowth is not accurately measured and acknowledged so a complete picture of the real net change in vegetation across Queensland does not inform decision making. The debate will remain myopic until the Queensland Government improves the level of information and statistics around land clearing, regrowth, and change in land use away from agricultural production.

No consideration of economic impacts – agricultural production

The economic return and job creation derived from IHVA clearing for irrigated agriculture is very high compared to the amount of land cleared. For example, if the 5,608 hectares that has been approved for IHVA clearing was used in the following industries, the regional economic stimulation and job creation would be:

Sugarcane	\$28 million in additional gross state product 1,203 direct jobs
Mango	\$89 million in additional retail value 617 direct jobs
Banana	\$269 million additional gross value of production 2,243 direct jobs
Macadamia	\$73 million in additional wholesale value 196 on-farm jobs
Cotton	\$39 million in additional value 65 on-farm jobs

This sort economic analysis did not form part of the policy development and was not responded to by the government. Many rural and regional communities rely on the considerable returns of these high-value industries for their economic wellbeing. They provide relatively high direct and indirect employment for their small footprint – something that is much needed in regional Queensland.

No consideration of economic impacts – land values

The legislative changes also extended the protection of high value regrowth vegetation to align with high conservation values by increasing the land types on which high value regrowth is regulated and amending the definition of high value regrowth to be vegetation that has not been cleared for 15 years. The economic impact if this decision was not modelled, even though it was acknowledged in the government’s explanatory notes it may adversely affect landholders’ rights retrospectively in this regard.

No consideration of economic impacts – public assets

Through various government owned corporations (GOC) and statutory authorities, the Queensland Government owns and controls almost all the electricity and water assets across the state. Other government policy decisions have led to the cost of electricity and water becoming unaffordable for agriculture. In response, farmers are leaving the electricity grid and using less water, reducing the long-term profitability and viability of these public assets (often referred to as ‘death spirals’). Changes to the



vegetation laws have effectively put a stop to any organic growth in irrigated agriculture, particularly in the Reef catchments, and QFF is aware that some GOC boards are already analysing how this will impact the future profitability and growth of these organisations.

No Regulatory Impact Statement (RIS)

Despite all the evidence above, the Queensland Government did not conduct a RIS. It did not make the Preliminary Impact Assessment publicly available and nor the Office of Best Practice Regulation's decision that a RIS was not required. The trigger or requirement to conduct a RIS is whether the proposed regulatory change is likely to result in significant adverse impacts – it was clear that these legislative changes were going to.

To be effective, vegetation and land management policies must be risk-based and consistently consider and balance economic, social and environmental factors. Regulations and restrictions must be underpinned by strong, testable and repeatable scientific knowledge, and adequate consultation with key stakeholders. Governments that fail to do this create mistrust and doubt in the landholders these types of policies directly affect, and they will not accept the regulations as having legitimacy.

Yours sincerely

Travis Tobin
Chief Executive Officer