



# 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

27 January 2021

Soils Policy Team  
Department of Agriculture, Water and the Environment  
GPO Box 858  
CANBERRA ACT 2601

Via email: [national.soils@environment.gov.au](mailto:national.soils@environment.gov.au)

To Whom it May Concern

### Re: Draft National Soil Strategy (2021)

The Queensland Farmers' Federation (QFF) is the united voice of intensive and irrigated agriculture in Queensland. It is a federation that represents the interests of 21 peak national and state agriculture industry organisations and 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)
- Queensland United Egg Producers (QUEP)
- Turf Queensland
- Queensland Chicken Meat Council (QCMC)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Fairbairn Irrigation Network Ltd
- Mallowa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd
- Eton Irrigation Scheme Ltd
- Pork Queensland Inc
- Tropical Carbon Farming Innovation Hub
- Lockyer Water Users Forum (LWUF)

QFF welcomes the opportunity to provide comment on the Draft National Soil Strategy. We provide this submission without prejudice to any additional submission from our members or individual farmers,

*The united voice of intensive and irrigated agriculture*



noting the limited consultation timeframe over the Christmas and holiday period which has resulted in many QFF members unable to provide review.

QFF understands that the (Draft) National Soil Strategy aims to provide a national vision and shared goals and objectives for managing soil across all landscapes, from cities to the regions, and from our farms to our natural environments. The goals and objectives in the Draft Strategy are aimed at restoring and protecting soil nationally, to drive on-ground action, research, education, monitoring and governance.

Critically, the National Soil Strategy articulates the shared vision between the state, territory and Australian governments of Australia. All levels of government, industry, research institutions, and land managers have a role to play in caring for this invaluable resource, soil.

The health and productivity of our soils is a critical consideration for all of Queensland’s farmers. We know that our soils are being negatively impacted by climate change, particularly the increasingly harsh cycles of drought and flood and widespread fires. Nearly 70 percent of Queensland is still drought declared<sup>1</sup>.

Soils are our lifeblood; they assist us to ensure food and nutrient security for our communities through to providing opportunities to build resilience to a changing climate and carbon storage.

**Background**

While QFF supports a national and consistent approach to the management of soils, it is noted that Queensland has many unique characteristics that have not been considered in the current draft strategy.

Firstly, Queensland has the largest land-use area allocated for agricultural production in Australia, around 88 percent of Queensland’s land area is agricultural (Table 1). Thus, Queensland’s farmers are the largest land-use managers and soil managers in Australia. Much of the agricultural land is allocated to grazing, with a relatively small land allocation for cropping. This means that many of the stresses and opportunities for soils and their management may be different to other states.

Much of the grazing land area is lease hold, making the Queensland Government the most significant single landowner. And, the climatic zones (tropical and sub-tropical) and climate factors are unique. The quantity of soil science and applied soil management practice in tropical and sub-tropical zones is nascent as evidenced by the limited volume of literature available and limited soil management programs to date.

**Table 1 – State Summary of Agricultural Activities 2018-2019 (ABS. 71210DO001 Agricultural Commodities 2018-2019<sup>2</sup>)**

	Land Area Use for Ag (Ha) <sup>1</sup> 2018-19	Number of Businesses <sup>1</sup> 2018- 19
QLD	<b>126,491,893</b> - Crops 3,181,001 - Grazing 123,034,249	19,017

<sup>1</sup> See <https://www.longpaddock.qld.gov.au/drought/drought-declarations/>

<sup>2</sup> See <https://www.abs.gov.au/statistics/industry/agriculture/agricultural-commodities-australia/latest-release>

NSW	<b>49,311,108</b> - Crops 8,721,662 - Grazing 40,366,560	26,471
VIC	<b>10,837,393</b> - Crops 4,604,642 - Grazing 6,162,930	21,433
WA	<b>76,630,796</b> - Crops 9,600,503 - Grazing 66,866,028	8,409
TAS	<b>1,291,756</b> - Crops 99,680 - Grazing 1,065,073	2,444
NT	<b>54,818,480</b> - Crops 17,414 - Grazing 54,798,872	379
ACT	<b>21,906</b> - Crops 409 - Grazing 21,497	43
SA	<b>43,973,588</b> - Crops 4,694,461 - Grazing 39,241,945	9,652

Whilst QFF welcomes the widening scope of the Draft Strategy to include soils and their value beyond agriculture, the risk is that the scope becomes too broad and difficult to articulate.

#### ***Land Use Planning***

QFF strongly supports the principle that strategic soil resources should be clearly identified and mapped, valued in planning frameworks and policy and, where necessary, protected (Objective 2c). Soils are part of our green infrastructure, are a significant factor in the Australian economy and, as such, the protection of soils must be incorporated into land-use planning frameworks.

The protection of soils through the land-use planning framework is not currently done effectively in Queensland, with soils often considered as a minor component in regional plans and planning schemes. Due to the incremental nature of policy development and issue resolution within government, the Queensland policy framework for the protection of agricultural land for productive purposes currently consists of three separate approaches to this issue, only one considers the quality of the soils whilst there is no clearly articulated framework for their protection. Soils must be an explicit part of the land-use decision making process.

#### ***Soil Contamination***

The Draft Strategy only references soil contamination twice, both in very generic contexts. Soil contamination is a major and growing concern for Queensland's agricultural sector and an area that

requires further research, education and extension. Provision to effectively identify and manage soil contamination must be considered in the Strategy and the Action Plan.

### ***Synergies to other Programs***

It is appreciated that the Commonwealth Government does not want to specify actions within the Strategy document, with concerns about specifying details which may not be widely applicable or to introduce expectations around funding.

There are therefore a lot of expectations around the development of the Action Plan and if it will provide sufficient stimulus to get traction with the relevant stakeholders. The success of the Strategy will ultimately depend on 'improvements on the ground' and this will require funding of extension and other practical tools and programs by trusted advisors.

QFF also notes that there are numerous Government-led programs and strategies which consider soils, including, but not limited to the Agricultural Stewardship Package which is currently being developed; the Regional Land Partnerships Program (see Outcome 5), Future Drought Fund, Emissions Reduction Fund methodology for soil and, at Queensland-level, the Drought and Climate Adaptation Program amongst others. There are also a range of industry-led programs which include soils, not least the Best Management Practice systems across agriculture.

Any initiatives in the Action Plan must compliment and support existing schemes and take care not to dilute resourcing, duplicate initiatives and re-invent programs.

QFF notes that the stated Progress Measures under some of the Goals are unclear, they must be concise with precise and appropriate wording for the target audiences. In their current format, some Progress Measures may not be accurately communicated and will be open to interpretation, or worse, apathy.

If you have any queries regarding this submission, please do not hesitate to contact me.

Yours sincerely

Dr Georgina Davis  
Chief Executive Officer