



QUEENSLAND FARMERS' FEDERATION

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Submission

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Reef Protection Regulations
Office of the Great Barrier Reef
Department of Environment and Science
GPO Box 2454
BRISBANE QLD 4001

Via email: officeoftheGBR@des.qld.gov.au

To Whom it May Concern

Re: Draft standard conditions for new or expanded commercial cropping and horticulture activities

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 standard conditions for new or expanded commercial cropping and horticulture activities. We provide this submission without prejudice to any additional submission from our members or individual farmers.

The united voice of intensive and irrigated agriculture

QFF understands that the (Draft) standard conditions for new or expanded commercial cropping and horticulture activities will apply in Reef catchments on five to 100 hectares from 1 June 2021 under the Reef protection regulations. In line with these standard conditions two draft guides have been developed for landholders to understand the new requirements.

QFF will make only general comments regarding the new requirements.

The draft guides are welcomed as they provide clarity for growers, and others involved in providing advice on setting up new cropping enterprises, including avoiding and mitigating sediment and nutrient loss on agricultural properties.

Background

Like all Australians, farmers want to ensure the Great Barrier Reef (GBR) is protected and preserved for generations to come. QFF reminds the department that the impact of land-based activities on the GBR is the sum of all industries operating in the reef catchments, and that even smart regulation is a blunt instrument that supports minimum standards of compliance at the expense of true practice change. Any government intervention must ensure it is outcome-focussed, and that outcome must address the sum of all activities.

The best way for the sum of all agricultural activities to achieve a positive outcome is by having as many farmers as possible adopting a culture of innovation and excellence.

Regulation has never proven to be the catalyst for creating a culture of innovation and excellence, so it is likely that it will not realise the outcome sought.

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.

BMP Accredited Growers

QFF strongly supports the notion that agricultural operators accredited through recognised industry programs will not be the focus of government compliance activities under these new standards and are exempt.

Application Fee

QFF requests the removal or major reduction in fees as outlined in fees as applications <100 hectares are largely a tick and flick exercise if the agricultural operator is BMP accredited.

Revision of Wording

QFF strongly urges the revision of wording around erosion and avoidance of run off. The best available science tells you that avoidance of run off is unavoidable, likewise the avoidance of run off is just not possible utilising the best available science and industry best practice.

Standard Condition 3

It is noted that prior to 1 November each calendar year a waterway buffer must be implemented and maintained between the defining bank of all downslope waterways and the edge of any adjacent cropping or fallow areas. QFF questions how this date is workable and realistic with differing production cycles across the regulated catchments and the viability of the buffers established prior to a wet season.

QFF suggests that an annual compliance date is implemented to suit on farm business practices, with reference to a time frame (for example July to October) applicable to commodity type.

Concluding comments

QFF and its members remind the government we do not support the regulation of agricultural activities as described in the current regulations. 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 standard conditions for new or expanded commercial cropping and horticulture activities 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

Dr Georgina Davis
Chief Executive Officer