



QUEENSLAND FARMERS' FEDERATION

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Submission

1 July 2021

Committee Secretary
Health and Environment Committee
Parliament House
George Street
BRISBANE QLD 4000

Via email: hec@parliament.qld.gov.au

To Whom It May Concern

Re: Environmental and Other Legislation (Reversal of Great Barrier Reef Protection Measures) Amendment Bill 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 20 peak state and national 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 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)

The united voice of intensive and irrigated agriculture



QFF welcomes the opportunity to provide comment on ***Environmental and Other Legislation (Reversal of Great Barrier Reef Protection Measures) Amendment Bill 2021***. We provide this submission without prejudice to any additional submission from our members or individual farmers.

Background

QFF has been involved in Reef-related activities over many years, from policy development to managing/coordinating the Australian Government's single largest investment in a water quality project – the Reef Alliance Growing a Great Barrier Reef project (the GGBR project). We are also an inaugural member of the 'Reef 2050 Advisory Committee' (RAC), which has regularly met since August 2015 to learn from others about Reef challenges and provide strategic advice on the implementation of Reef 2050 actions, stakeholder priorities, and highlight any emerging cross sectoral issues that need to be addressed.

Through our involvement with RAC and its 'associated' scientific advisory body – the Independent Expert Panel (IEP) – and the fact that we are not a scientific organisation, QFF has no reason to question that land-based run-off continues to impact water quality in the GBR, and that agricultural activities contribute to this. We also do not question that if the highly ambitious water quality targets that governments have set (but inadequately funded to date) are to be achieved, effort to address water quality outcomes must be increased. However, we have consistently and strongly questioned and challenged the way governments, mostly the Queensland Government, is responding to the water quality challenges through regulation.

Summary

QFF understands the main policy objective of the Bill is to repeal a number of amendments made by the *Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Amendment Act 2019*, which was passed on 19 September 2019.

QFF has been staunch in its previous submissions in opposing increased regulation on agricultural industries operating in the Great Barrier Reef (GBR) catchments.

No one questions the value of the GBR, its standing as a natural wonder of the world, or that we must do all we can to preserve it – least of all Queensland's agricultural sector who benefit directly from its locality. While it is accepted that climate change is the greatest threat to the future of the GBR, debates continue around whether the Reef can thrive or indeed survive under current climate projections. Similarly, while it is accepted that poor water quality entering the GBR negatively impacts the Reef's health and resilience, debates continue around where (point source) nutrient and sediment loads come from and how much they impact the GBR. As such, QFF strongly supports more scientific investigation into this area, and has invested in supporting an ARC Linkage project for biogeochemical fingerprint technology for tracing the land-use sources of particulate nitrogen.

QFF supports the Bill's amendments. If passed, this Bill will repeal Reef protection regulations and include sensible amendments to remove the regulatory burden from farmers that does not lead to improved environmental outcomes for the reef. The Queensland Government's main justification for increasing the regulations on agriculture in 2019 Act is that voluntary approaches have failed to facilitate enough take up of improved practices and at the present trajectory, the Reef water quality targets under the Reef 2050 Water Quality Improvement Plan 2017-2022 (WQIP) will not be met. The Bill before the committee provides a way forward for the agricultural industry to continue to implement industry best management practice standards which are also being advanced by international and trade requirements.

Accordingly, QFF submits to the Committee that it recommends to the Parliament that:

1. the Bill be supported and the government focus on implementation of the suggested amendments.

2. the 2019 Act has created confusion and added to the farming sector frustration with Government policies that have added administrative burden and costs without obvious environmental benefit.
3. the government provide a full cost/benefit analysis of over 10 years of regulation in GBR catchments, and the outcomes achieved.
4. the Bill removes the reference to ERMP's as a requirement. It is recognised by both government and industry these are ineffective and divert resources from more meaningful practice.
5. the government increase investment in industry programs to a more realistic level considering the water quality targets it has set.
6. the government work more closely with agricultural industries operating in the Reef catchments to get the stewardship and market incentive mix right for farm businesses to speed up the progress towards the water quality targets under voluntary approaches.
7. the government consider the cumulative impacts of other policy decisions it has made on the profitability and sustainability of farming businesses in Queensland and commit to addressing them.

Conclusion

QFF's members remain principally opposed to the regulation of agricultural activities as described in the current 2019 Act. We consider regulation is a high cost, simplistic instrument that supports minimum standards of compliance, and does not encourage or foster a culture of long-lasting practice change. By contrast, voluntary industry-led farm management systems (such as BMP programs) and other water quality improvement projects have proven to be enablers of such cultural changes.

QFF acknowledges that government consider the take up of improved practices has been too slow but points out that there has been significant underinvestment in voluntary and industry-led programs to date when considered against the cost of achieving the water quality targets that governments have set.

QFF is concerned that the full financial impact of the 2019 Act on agriculture is not clear. Over 95% of Queensland's farm businesses are family owned, and many of them are already struggling with the cumulative impact of various government policy decisions, drought, flood and other climate impacts, as well as COVID-19 disruptions.

Queensland agriculture acknowledges and accepts the role it must play in the Reef recovery effort. Many farmers and industry organisations have worked extremely hard to ensure that they do not negatively impact the Reef or broader environment. QFF and members remain committed to our sector continuing to deliver on community expectations and protect and maintain the intrinsic values of the GBR.

Please do not hesitate to contact Mr Adam Knapp at adam.qff.org.au if you have any queries on the submission.

Yours sincerely

Dr Georgina Davis
Chief Executive Officer