



QUEENSLAND FARMERS' FEDERATION

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

SUBMISSION

22 December 2021

Drought Policy Branch
Drought and Farm Resilience Division
Department of Agriculture, Water and the Environment
GPO Box 858
CANBERRA ACT 2601

Via email: droughtpolicy@awe.gov.au

Dear Sir/Madam

Re: Shared Responsibilities Discussion Paper

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 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
- Queensland Oyster Growers Association
- Lockyer Water Users Forum (LWUF).

The united voice of intensive and irrigated agriculture



QFF welcomes the opportunity to provide comment on Shared Responsibilities in Drought Response, Recovery and Preparedness: discussion paper. We provide this comment without prejudice to any additional commentary from our members or individual farmers.

As requested, the following is in response to the questions in the discussion paper, specifically commenting on the depiction of the roles and responsibilities of those involved in drought response, recovery and preparedness and proposed pillars to guide an integrated and strategic response to drought.

The Queensland agriculture sector is very familiar with the concept of “shared responsibility” and the requirement on farm businesses to manage risk, be that drought, adverse weather conditions or a biosecurity incursion. QFF agrees in principle with the concepts outlined in this Discussion Paper, but notes a possible risk to practical adoption of the roles, responsibilities, objectives and intended outcomes as intended.

QFF members have experience in the application of shared responsibilities for plant and animal biosecurity management. Similarly, there is a high-level representation of shared responsibilities with government agencies, but experience sometimes yields unintended consequences. There is the possibility that government and non-government actors shift their roles and responsibilities; or farmers are encumbered with additional input costs and “red tape” to meet their obligations. Consequently, QFF is cautious about the practical delivery of the Shared Responsibilities in Drought framework.

Question 1: *Is the depiction of the roles and responsibilities of parties involved in drought, clear and representative of your role in preparing for, recovering from and responding to drought?*

QFF agrees in principle with the role and responsibilities of farm “to prepare for, manage through and recover from drought by taking active steps through risk management and taking on opportunities, within their control.”

QFF realise there are some elements of drought mitigation that farmers cannot control, especially in extreme or ongoing drought conditions. QFF endorses farm businesses taking active steps to manage drought risk with available resources and to prepare for the drought life cycle, however in extreme drought conditions or where there is impost on a farm business outside of their control, working together with government and non-government agencies in a holistic and integrated approach to mitigating risk and business interruption may be required.

Question 2: *Are the proposed key pillars to guide a shared and holistic approach across the various parties, clear and representative of your views?*

QFF agrees in principle to the proposed Shared Responsibilities Pillars. QFF agrees there must be clarity and transparency from government and non-government agencies. We agree with the adoption of a continued and evolving approach, this must be fit for purpose with a local imperative to the drought cycle.

For example, we need a clear definition of drought, especially determining the different severity levels of drought and aligning those levels to water availability and use for irrigation. This requires more integrated water management to allow the departure from the traditional transactional support measures. As part of this continued and evolving approach to drought mitigation, there is a need to develop a catchment-by-catchment basis to enable specific and measurable metrics per catchment, per location.

Question 3: *Does the structure and content of the High-Level Representation of Shared Responsibilities provide the information and framework necessary to deliver meaningful actions across the drought cycle and relevant parties? Are there any gaps or opportunities that need to be considered?*

The information and framework appear appropriate. QFF has a concern as to the practical application of the High-Level Representation of Shared Responsibilities, noting past and current experience of farming commodity groups with the same concept applied to plant and animal biosecurity. QFF does not support a framework that in its application increases farm input costs or adds layers of bureaucracy to farm drought mitigation practices.

Question 4: *Would agreement to the High-Level Representation of Shared Responsibilities provide greater clarity and encourage collaboration between government and non-government actors?*

QFF agrees that in principle agreement to the High-Level Representation of Shared Responsibilities will provide greater clarity and lead to collaborative opportunities between government and the private sector. However, there needs to be recognition of the role of government as a legislative authority, which can impose restrictions or other conditions on farm businesses.

If you require further information, please contact Ms Kerry Battersby at kerry@qff.org.au.

Yours sincerely

Dr Georgina Davis
Chief Executive Officer