



QUEENSLAND  
FARMERS'  
FEDERATION



**SUBMISSION TO AUSTRALIAN GOVERNMENT  
PRODUCTIVITY COMMISSION  
REGULATION OF AUSTRALIAN  
AGRICULTURE**

February 2016

*The united voice of intensive agriculture*



## Introduction

The Queensland Farmers' Federation (QFF) is the united voice of our state's intensive agriculture industries. We are a federation that represents the interests of 17 of Queensland's peak rural industry organisations, which in turn collectively represent more than 13,000 primary producers across Queensland. Our member organisations are:

- CANEGROWERS,
- Cotton Australia,
- Growcom,
- Nursery & Garden Industry Queensland,
- Queensland Chicken Growers Association,
- Queensland Dairyfarmers' Organisation,
- Burdekin River Irrigation Area Committee,
- Bundaberg Regional Irrigators Group,
- Central Downs Irrigators Limited,
- Fitzroy Basin Food & Fibre,
- Flower Association of Queensland Inc,
- Pioneer Valley Water Board,
- Pork Queensland Inc,
- Queensland Chicken Meat Council,
- Queensland United Egg Producers,
- Australian Organic; and
- Queensland Aquaculture Industries Federation,

Our agricultural sector is critical to the success of the Queensland economy making up around 5.1% of the State's GDP, or \$14.5 billion. Agriculture in Queensland has bright future and is well placed to take advantage of the expanding population in key Asian markets.

QFF engages in a broad range of economic, social, environmental and regional issues of strategic importance to the growth, profitability and sustainability of the agricultural sector. Our aim is to achieve strong and sustainable agricultural and horticultural industries that can capitalise on future opportunities.

## Background

QFF thanks the Commission for the opportunity to contribute to this review. This submission is an overarching document that identifies a range of issues that have been raised by our members with respect to the Regulation of Agriculture. The QFF urges the Commission to liaise closely with our members about their industries and the specific regulatory burdens and restrictions that they encounter.

QFF members regularly assert that they are faced with a significant array of complex and often overlapping regulation that adds costs to their business in understanding, managing and complying with these regulations. Doubt that the regulations are warranted, appropriately targeted, and that the benefits will outweigh the costs of compliance also add an unnecessary burden to farm businesses.

The QFF recognises the need for effective regulation to provide protections for farm business owners, their workers, and the communities in which they operate. Such regulation needs to set the minimum level of performance required to meet community standards and expectations, and underpin the production of safe, high quality, sustainable products that allow farmers to access both domestic and international markets. We remain concerned however that the current excessive amount of regulation acts as a hindrance to productivity and stifles innovation.

QFF notes that in recent years both government and industry have undertaken inquiries and research into the regulatory burden facing Australian farmers. The QFF provided a submission to the *Productivity Commission Review of the Regulatory Burden on Primary Industries* ([here](#)) in June 2007, the

National Farmers' Federation (NFF) released its *Issues Paper – Red Tape in Australian Agriculture* ([here](#)) in 2013, the report commissioned by the NFF *Cost of Bureaucratic Red Tape in Agriculture* ([here](#)) in 2007, the 2013 *Review of Selected Regulatory Burdens on Agriculture and Forestry Businesses* ([here](#)), and the Retailer and Supplier Roundtable Ltd report *Paddock to Plate: Regulatory Hurdles* ([here](#)) released in 2014 all identify the overall cost of regulation for a farm business.

While reiterating our view that some regulation is warranted, the current amount of regulation appears to be excessive and duplicative and is a potential hindrance to productivity and productivity growth in agriculture and horticulture. The government must strategically assess all areas where regulation is burdening businesses and take steps to free up farmers and increase their returns at the farm gate.

### **Key areas of concern**

A number of our members will submit directly and many have met and spoken with the Commission during this inquiry. QFF does not seek to duplicate their work but simply to highlight areas of common concern across the sector.

The following issues have been raised in a number of submissions and each industry will have specific comment on the issues that impact on their growers' farm businesses:

- Water security, availability and Irrigation water charges
- Energy regulation and the cost of electricity to consumers
- Food safety compliance and quality assurance
- Biosecurity and quarantine matters
- Workplace health and safety regulations
- Skilled labour and general labour availability and efficiency
- Chemical use and management
- Planning and land use in peri-urban areas and land use conflicts
- Transport regulations and charges
- Natural resource management
- Environmental management and protection
- Regulations relating to land and water management in Great Barrier Reef catchments
- Animal welfare and regulations relating to animal production systems

### **Conclusion**

The QFF recommends the Commission reviews the body of work that has been undertaken over many years, identify pragmatic and practical recommendations from these diverse sources, and focus on producing a list of sensible, practical reforms that will make a difference to farmers. QFF urges the Commission continue to engage with industry throughout the process to ensure changes are to the benefit of industry and government. Importantly, the QFF would welcome a recommendation that a whole-of-government approach be taken in respect of future policy development following this regulatory review.