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Submission

30 September 2022

Ms Courtney Bryant
Assistant Secretary, Drought Policy Branch
Farm Resilience Division
Department of Agriculture, Fisheries and Forestry
GPO Box 858
CANBERRA ACT 2601

Via Email: droughtpolicy@agriculture.gov.au

Dear Ms Bryant

Re: Review of the Australian Government Drought Response, Resilience and Preparedness Plan

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)
- EastAUSmilk (formerly QDO)
- Australian Cane Farmers Association (ACFA)
- Turf Queensland
- Queensland United Egg Producers (QUEP)
- Queensland Chicken Meat Council (QCMC)
- Pork Queensland Inc
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Fairbairn Irrigation Network Ltd
- Mallawa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd
- Eton Irrigation Scheme Ltd
- Lockyer Water Users Forum (LWUF)
- Queensland Oyster Growers Association (QOGA)

QFF welcomes the opportunity to provide comment on the Australian Government's Drought Response, Resilience and Preparedness Plan. We provide this submission without prejudice to any additional submissions from our members or individual farmers.

QFF Drought Policy

Queensland Farmers' Federation (QFF) and its members recognise that drought and climate variation is an integral part of farming in Queensland, and farming businesses need to be able to plan for and manage these variations as part of their risk management. GHD research has shown that naturally occurring events such as droughts, storms and floods exacerbated by climate change, could result in a loss of $312 billion to Australia's GDP between 2022 and 2050, which is almost a third of Australia's GDP in 2020. [1]

At a policy level, QFF supports the approach of government to assist farm businesses to become more drought prepared, with a capacity to be self-reliant and resilient. QFF encourages a move away from "transactional" assistance during dry seasonal conditions that can be considered part of the normal climate cycle.

QFF advocates for an approach to drought resilience on a catchment-by-catchment basis or where irrigated commodities rely on a water allocation and licenses to ensure farm viability and sustainability. For example, a single year of zero access in a particular catchment, may not be considered outside the normal range for that catchment, and in some catchments (based on historical records) two years of zero access may not be considered abnormal. However, in other catchments the same variance might be extremely abnormal and therefore could trigger assistance. Determining the different severity levels of drought and aligning those levels to water availability and use for irrigation requires more integrated water management.

Integrated land management begins with the understanding of interconnected ecosystem relationships in catchment areas and incorporating differences between landscapes, climate, combined with on-farm efficient water management practices. The overall sustainability of water used in agriculture is reliant on using water under different climatic conditions, which requires the combination of healthy land management to maintain healthy soils, and utilising water to maximise efficiency, affordability and reliability, through various water saving management practices. Water saving management practices can be undertaken by water sharing through trading, efficient irrigation systems, various on farm storages, change of cropping systems and planning with mitigation practices to reduce biotic and abiotic stressors, which reduce water efficiency.

Detailed climate change modelling is needed to help farms become drought-resistant throughout each catchment area. Climate change modelling that assesses the estimated future evaporation rates, water availability for irrigation, potential estimated variation to water allocations and suggested alternative crop viability should be a requirement as part of the Australian Government Drought Plan.

QFF recognises that some droughts fall outside of what can be considered normal cycles, and as the climate changes this will exacerbate drought conditions as they become more frequent, more severe, and last longer. Changing water distribution, where temperatures are warming, and precipitation patterns decrease, will increase the likelihood of drought.

Considering that long drought events may be more regular and more intense, transactional assistance

[1] Aquanomics: The economics of water risk and future resiliency - GHD

should be more in line with on-farm business planning, and assistance that alleviates water and energy costs, which will help with the sustainability of our primary production enterprises.

To address your series of questions, we provide the following response.

Question 1: How would you use the Australian Government Drought Plan?

QFF and its members use the Australian Government Drought Plan to inform industry policy and any new drought initiatives. It is a useful tool in ensuring consistency across policy when advocating on related issues.

Question 2: What are the key things you want to see in the Plan?

QFF's drought policy highlights the need for a catchment-by-catchment approach to drought preparedness, resilience and response. QFF requests the Australian Government Drought Plan acknowledge the importance of water allocation for irrigated crops with an ongoing review of allocations. Climate change modelling is vital when assessing drought policy and the impacts at each catchment level, including water allocations. Evidence-based scientific data, that investigates impacts of droughts on the agricultural sector needs to be a priority when formulating the Drought Plan.

During drought conditions, after impact of natural disasters or as a result of biosecurity incursions, farmers seek government aid. QFF wants to see a Plan that includes management of extreme drought conditions, which includes a response from all levels of government.

Currently the Plan outlines the future actions and commitments of the Australian government, it would be beneficial to ensure there are clear monitoring, evaluation and learning mechanisms that allow these to be benchmarked and evaluated for effectiveness. Transparent evaluation of the actions and commitments of as part of the plan will ensure that stakeholders have trust in the plan and the public funds being invested.

Prolonged drought has a significant impact on agricultural businesses and the communities in which they operate, as a result there is currently significant and welcome investment into planning and preparedness for drought. It is important that planning is coordinated to ensure the stakeholder time as well as private and taxpayer funded investment achieves its most efficient return on investment. The Plan must operate as the overarching guiding document for all other drought preparedness plans done at a state and regional level to ensure that the outcomes of those grassroots documents are consistent with the overarching strategic objectives of the Commonwealths planning and investment for resilience and drought preparedness.

Question 3: How can the Plan best be made easy for a range of audiences to understand?

Our focus is on methods by which the Plan is communicated to primary producers. We recommend the communications plan include engagement with peak industry bodies within the agriculture sector, provision of resources and materials that can be used by the industry bodies to communicate with their members and other producers within their industry. Suggested resources and materials to provide to industry bodies could include:

- Print copies of the Plan and online PDF version
- Social media tiles
- Education resources, e.g., flyers, information leaflets
- Links to website

- Online notifications/alerts of site updates relevant to the Plan, drought policy or changes to drought activities
- FAQ section on the website

Question 4: How should the Plan recognise key players' contributions to helping farmers and communities prepare for, manage through, and recover from drought?

Defining participants within the drought policy area may be achieved by listing basic information about their role and level of participation, for example, a consultant to the Department, List of Submission providers, Adviser to the process, policy officer, etc.

It is important that transparency is maintained by the Australian Government, to ensure community know the level and type of contribution made by the various stakeholders. An active and transparent consultation process that will ensure the Plan has buy-in at multiple levels and achieves it's set objectives.

Question 5: Are you comfortable with the Plan including high-level descriptions of key support streams and weblinks for those seeking further information, rather than detailed descriptions of individual programs?

QFF requests the Plan budget has a comprehensive communications program that includes website management, ongoing stakeholder engagement, and print versions of resources. Timeliness and accuracy of online information is critical and should be considered an essential output of an Australian Drought Plan.

Question 6: Are there other practical ways the government can ensure the Plan stays relevant over time and across the drought cycle?

QFF encourages ongoing engagement activities with peak industry bodies over time and across the drought cycle, to ensure information is delivered and farmer discussion and comment is received by the drought policy team.

Question 7: How would you like the Plan to clearly explain the government's drought policy? What policy details do you want to see in the Plan?

QFF agrees with the government's policy that drought is an inevitable and recurring feature of the Australian landscape, and farmers and communities need to manage drought risk just as they do other risks to their businesses or communities.

Preparation and risk mitigation activities are crucial in managing the effects of drought on farm. Risk mitigation is vital, however many farmers are already implementing climate change adaptation strategies, such as increasing on-farm dam storage. As such, this policy requires details that allow for the increase in adaptation measures such as an increase in water storage options, and water market trading that help to alleviate the stressors of drought.

Question 8: How would you like to see the Plan give greater transparency about how and when the government will respond across the drought cycle?

QFF acknowledges that the best preparation will not necessarily prevent suffering for farmers during extreme, on-going drought or low water supply situations. We ask for a formalised and prepared

response for 'in-drought' relief be provided by the Australian Government, to ensure we avoid the rush and ad hoc response that might come with an unexpected emergency declaration.

Question 9: What practical metrics would you like to see the government report on to demonstrate drought policy is achieving its aims, and achieving outcomes for farmers and regional communities?

QFF believes monitoring, evaluation and lessons learned from the policy needs to be approached in a long-term, ongoing way perhaps, even generational. Farmers tend to have a staged approach to their business management, for example, they plan production cycles which may be seasonal, annual, bi-annual or longer, and indeed they adopt long-term, generational-thinking when planning business growth and transition.

The true outcome of many of the current programs operated through the Future Drought Fund will only be realised when farmers and communities next experience drought conditions and low water supply. Therefore, QFF would ask the drought policy to adopt an evaluation beyond any seasonal conditions or political election cycle. It is important to ensure a drought policy that advocates for preparedness and shared responsibility can be monitored and evaluated through the life cycle of drought, including in-drought declarations.

The multiple programs operating in the Future Drought Fund is comprehensive and an admirable, yet daunting, task. However, at this early phase, there appears to be a need for greater cross-collaboration between programs, to avoid drought being driven by a silo response. This can be achieved by increased communication between program managers, delivery partners and pollination of innovative concepts across projects. All programs should reference back to the Australian Drought Plan and national strategy in documents and reports, to ensure a consistent, unified approach to national drought policy.

Question 10: Do you agree with the feedback provided to date? If not, why? If there anything missing?

Many farmers are already participating in industry best management practices, establishing innovative approaches to farm production, and contributing to their local communities. They accept the concept of shared responsibility across their production and business cycles and comply with government agency activities. This approach needs to be acknowledged by the Plan.

As mentioned in Question 9, there appears to be a need for greater cross-collaboration between programs delivered under the Future Drought Fund. While we deliver drought mitigation as a local, catchment-by-catchment level, acknowledgement of the Australian Drought Plan should be included in each program for all delivery partners.

In summary, QFF advocates for an approach to drought resilience on a catchment-by-catchment basis or where irrigated commodities rely on a water allocation and licenses. to ensure farm viability and sustainability. Adopting a local approach within a national plan is critical to the long-term success of farming communities as they prepare for and experience drought conditions.

Yours sincerely

Ms Jo Sheppard
Chief Executive Officer