



QUEENSLAND
FARMERS'
FEDERATION

Review of Rural and Regional Adjustment 1994

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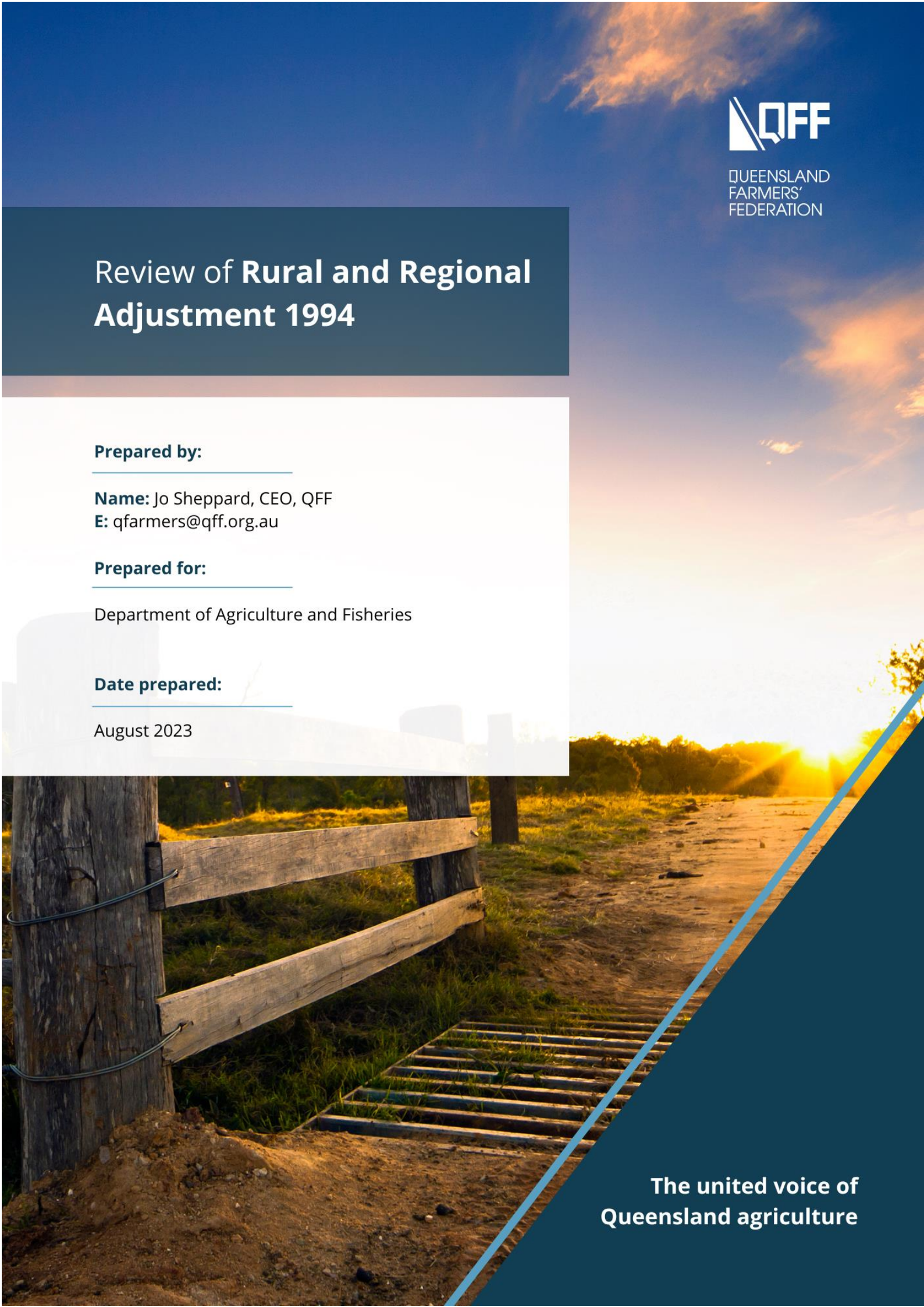
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A photograph of a rural landscape at sunset. In the foreground, a wooden fence made of weathered posts and rails runs across the frame. To the right, a dirt road or path leads into the distance. The background shows a line of trees and a bright sun low on the horizon, casting a warm, golden glow over the scene. The sky is a mix of blue and orange. A diagonal blue line cuts across the bottom right corner of the image.

The united voice of
Queensland agriculture

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This submission is provided to:

Department of Agriculture and Fisheries
Principal Policy Officer
Legislation and Regulation

Submitted via email legislationandregulation@daf.qld.gov.au

Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Queensland Chicken Meat Council
- Pork Queensland
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Queensland Oyster Growers Association
- Lockyer Water Users Forum

About the Queensland Farmers' Federation



The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

We are a member-based organisation representing the interests of peak agriculture industry organisations (both state and national). Through our members, QFF represents more than 13,000 primary producers across the cotton, cane, horticulture, dairy, nursery and garden, poultry, pork, and intensive animal industries.

We unite the sector to engage in a broad range of economic, social, environmental, and regional issues through advocacy, policy development, and project activity. We work with the government of the day on behalf of industry, farmers, and the community to provide powerful representation and contribution to the policy direction, sustainability, and future growth of Queensland's agriculture sector.

Our Council of member representatives and policy committees set the strategic priorities for policy development and advocacy, while our Executive Board ensures our corporate governance.

QFF draws on the expertise and industry knowledge of our members, and through our commitment to collaboration and considered policy development, we lead Queensland's agriculture sector towards a strong future, ensuring our members are ahead of the game and have a voice at the table on the issues that matter to their members.

Submission

QFF welcomes the opportunity to provide comment on the Review of the Rural and Regional Adjustment Act 1994.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

To address the department's questions, QFF has drafted the responses below.

1. If you have sought assistance through QRIDA, please provide a brief outline of your experience. What has worked well? Is there anything that could be improved?

QFF and its member industry groups have worked effectively with QRIDA and its former iterations for many years in several programs. This includes disaster recovery, drought assistance, one-off smaller grant funding schemes such as the current horticulture netting scheme, and also providing industry feedback on the Farm Debt Services program. As a package, the QRIDA offering to the rural and regional communities is vital.

QFF consider delivery of programs is often constrained by regulation processes but also poor communication with participants and industry. The veil of government regulatory processes is often without transparency, and indeed, within the scope of this Review, there is inconsistency in what items are considered "in scope" versus those items "out of scope". This review is seeking feedback

on “the experiences of people applying for assistance”, yet out of scope are “past or current schemes administered by QRIDA”.

2. Should the Act more clearly enable QRIDA to ask an applicant for more information, or for an applicant to provide more information before a final decision is made on an application for assistance?

Currently there is an onerous amount of information sought from applicants in the disaster recovery schemes and drought assistance. The current requirements to meet the Primary Producer (PP) and Primary Production Enterprise definition are excessively arduous and out of proportion for smaller grant schemes. If a business is applying for a large sum grant or loan, the amount of information required is understandable and should be comparable of those used by commercial financial lenders. However, for small assistance, the information required to determine PP eligibility is excessive, burdensome and inconsistent across QRIDA programs or Australian Government programs. QFF member feedback has highlighted how there have been instances where a new grower has forgone the opportunity of a lower interest rate loan through QRIDA as the process and information requirement through a commercial bank was less onerous with a shorter approval time.

3. Are the provisions providing for the review of decisions made by QRIDA under an approved scheme operating as intended?

The process to review decisions is one of the most heated topics and a key concern to the operations of QRIDA. Here communication is key and appears to be a weakness of the process. QFF understands that there have been examples where the language used by assessors in this process has been inappropriate and includes information that is confidential to a project outside the remit of the assessor to make comment. In other situations, the decision from QRIDA to review or seek further information has not been made clear to an applicant, and the recipient interprets the email as having been declined due to the language used in correspondence. There is a communication gap and a lack of collaboration between the communications team of QRIDA and its assessors regarding overall application process and application outcome.

While QFF sees the value of QRIDA, there have been significant inefficiencies and a lack of consistency built into programs to date. As a result, there is the potential for misinterpretation of scheme guidelines. The current Drought Program is one example; the program’s intention is to improve drought preparedness for primary producers, an admirable goal which QFF has always supported; however, delivery of the program has been less than satisfactory. In this example, QFF would advocate for a shift to a principles-based approach on drought reform, rather than determining the eligibility of applications based on predetermined criteria and comments made by assessors on an individual business plan provided by an applicant. For example, does the intended project achieve the drought preparedness outcome for the businesses and the location in which the project will occur? If yes, then funding is approved. Further comment may be outside the scope of this Review, but QFF welcomes any future opportunity for consultation.

4. Are there other circumstances in which QRIDA should be recovering assistance?

Under the Act, QRIDA’s power to recover assistance should remain without change. If any changes to the Act were to be put forward for amendment in the future, QFF recommends strong engagement and consultation with industry.

5. Is the current provision requiring an approved assistance scheme to be prescribed by Regulation operating well?

The requirement for an approved assistance scheme to be prescribed by regulation is unnecessarily arduous for smaller expenditure schemes, where the Department of Agriculture and Fisheries requires programs to be formally delivered under the QRIDA framework. Due to these issues, QFF is of the view that this framework is not operating well. QFF is currently experiencing delivery challenges with a disaster recovery program where there have been unnecessary delays to delivery due to the regulatory process. The current Industry Recovery and Resilience Officer program is one example where a small financial grant or rebate scheme for flood technical advice is delayed due to the need for the regulatory process. There is also the requirement for QRIDA to make it reasonably profitable to operate schemes, with smaller schemes not offering to recoup on costs. As a result of this, the administrative costs and initial outlay of money can often be prohibitive to programs being offered.

6. Should QRIDA be able to administer financial assistance on behalf of the Queensland Government outside of an “approved scheme”?

There is a case for QRIDA to be able to administer financial assistance outside of an approved scheme to enable flexibility in, for example, a declared state of emergency or crisis situation. This would widen the scope for capacity to deliver schemes offered by the State of Queensland beyond the Department of Agriculture and Fisheries during crisis situations. However, if these allowances were to be put into place, QRIDA would need first to improve standards of delivery, consistency and transparency in its current programs. Accepting a broader scope outside of an approved scheme may prove challenging at QRIDA’s current operating status.

7. Are there other things about the operation of the Act that you would like to raise?

The Act or any future amendments to the Act should always consider and consult with industry bodies whilst reflecting back on the objective of any funding and the flow on impacts it has for producers.

Yours sincerely

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