



WWF submission to Queensland Parliamentary Committee for
Agriculture, Resource and Environment Committee
**Reducing Regulatory burdens for Queensland's
agriculture and resource industries.**

WWF supports more efficient regulatory processes, if it can be shown that environment and policy outcomes will still be achieved. However, regulation is not inherently burdensome to industry and economic development and provides important safeguards for the environment and for the workforce. For example clear legislative requirements for urban, agricultural and industrial development can promote certainty, ensure land uses are compatible, and enhance optimum use of water and transport infrastructure, whilst avoiding environmental externalities.

WWF-Australia's major objective in Queensland is the protection of the Great Barrier Reef. Two of the key risk to the Reef come from the agriculture (polluted run-off) and resource sectors (coastal development). There has been ongoing debate about the most effective means to reduce the impact of these two sectors, including the appropriate mix of both regulatory and non-regulatory measures.

This submission will focus on how the right mix of incentives, regulation and alternative compliance can improve regulatory efficiency and improve economic and environmental outcomes. We hope this will assist the management of the agriculture and resource sectors in Great Barrier Reef catchments as well as more broadly.

Agriculture

One of the Government's key initiatives to reduce regulatory burden on agriculture is the development of best management practice programs (BMP) for the sugar and beef sectors.

The objective is to use BMP to facilitate the uptake of on-farm practices which improve business profitability whilst reducing impacts on the environment such as pollution running off into the Reef.

BMPs are to be used as an alternative to regulating standards for fertilizer and pesticide use through Environmental Risk Management Plans. The BMP could be used as alternative compliance not just for ERMPs but for other legislative requirements such as: land and water management plans, wetland and vegetation protection and others.

The key feature is that the BMPs will be 'alternative compliance'. If a business does not take the opportunity to develop a BMP then there is a need for legislative provisions to still apply.

Whilst most agricultural businesses will take the opportunity to meet standards with less compliance costs, a small percentage may not. The regulated minimum standards are necessary to ensure there is a level playing field, and gains made by BMP compliant producers are not eroded by those who opt out.

For example many businesses may reduce pollution coming off their properties but other properties may still have high levels of polluted run-off and will erode the overall performance of a region. This would have negative impacts on the Reef but also reflect negatively on the industry, and frustrate government programs.

The maintenance of a minimum regulated standards also provides an added incentive to under BMP, and thus overall the industry has more productive practices implemented.

Resource sector

The current Strategic Assessment of the Great Barrier Reef can potentially lead to efficiencies in regulation as well as improved environmental outcomes.

WWF's position on development is that the Strategic Assessment must lead to meaningful reforms to how development is planned and managed to better protect the Reef, including: clear no-go zones to protect high conservation areas; industrial development constrained to select hubs and world's best management standards required in hubs to demonstrate acceptable impacts; as well as stringent requirements to manage shipping risks from increased traffic.

Clear regulation in this instance can provide certainty and improve economic outcomes, whilst protecting the Reef and the tourism and fishing industries that depend on it.

The Government has announced four key elements for the Strategic Assessment: a ports strategy; refining the Coastal Plan; developing statutory regional plans; and reviewing environmental offsets.

The Government's port strategy will provide a mechanism to identify where port development should occur, and consequently which areas should be protected. The Coastal Plan and statutory regional plans also should be used to identify development areas and protected areas.

These elements along with addressing how best to co-ordinate with Commonwealth assessment requirements have the potential to set out a clear regulatory framework which can assist economic and environmental outcomes.

The Strategic Assessment should not merely be a plan for future development, but a plan for the future of the Reef. Improved regulatory arrangements for new development is only a part of the challenge to protect the Great Barrier Reef which faces a range of threats.

The Strategic Assessment should inform a Reef Resilience Investment Plan which prioritises the actions that need to be taken to protect the Reef and enhance its resilience.

The Government's review of environmental offsets is "to ensure funds derived from the Great Barrier Reef region are used to tackle the most significant issues facing the Reef" (Premiers media statement of 5/6/12) and can support a Reef Resilience Investment Plan.

This review has the potential to significantly reduce the regulatory burden on the resource sector whilst increasing environmental outcomes. Currently, each development is assessed and provided with a set of stand-alone and uncoordinated offsets which they then have to fulfil after approval but often before key works have begun.

A Reef Resilience Investment Plan would provide a framework and priority list of actions to invest in to achieve targets for Reef health. This would provide a lot more certainty for developers and avoid the transactions cost of development specific offset arrangements.

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