



17 August 2012

Mr Ian Rickuss MP
Member for Lockyer
Chair, Agriculture, Resources and Environment Committee
Sent via email: arec@parliament.qld.gov.au

Dear Mr Rickuss

Thank you for the opportunity to comment on removing unnecessary regulatory burdens on QLD's sugarcane farmers. For many years, environmental protection legislation has grown to the point where it is a dagger in the heart of economic development in regional Queensland. Removing some of these burdens is an opportunity to 'get Queensland back on track'.

CANEGROWERS has been encouraged by commitments from both Minister Cripps and Minister Powell and the latest Newman government six month plan, to work with this organisation to develop a Best Management Practice (BMP) program that can be used to replace the current reef regulations. The design of the BMP will be to develop a strategic direction and ensure that farmers are able to use their land to maximise their profitability and their productivity, while also being important environmental stewards.

As a horticultural farmer from the Lockyer Valley, you would be aware of the environmental constraints placed upon the agricultural sector, such as the Vegetation Management Act. In addition, sugarcane farmers have also had their fertiliser and chemical inputs restricted and have seen large areas of their farms declared protected riparian zones under the guise of "reef protection". These regulations have not resulted in better outcomes for the environment or the reef. The only success these environmental policies have had was to demoralise farmers and stall agricultural expansion along the Queensland coastline. The sugarcane and cattle industries have even been declared as Environmentally Relevant Activities (ERAs) by the previous government, placing these two agricultural industries in the same environmental risk category as aluminium smelters and coal mines. Cane growers have been audited by the "reef police" and have been chastised for minor infringements of record keeping "standards". Fortunately, these audits have now stopped.

The Productivity Commission recently noted that regulation can be necessary to achieve a range of social, environmental and economic objectives. The Commission also noted that, to achieve agreed goals and yield the greatest net benefit to the community, regulation must be well designed, and effectively and efficiently implemented and enforced.

By transforming the state's environmental protection strategy away from the demonising of growers and demanding regulatory compliance to incentives for best practice, Queensland's agricultural industries will once again thrive - without a negative impact on the environment. CANEGROWERS understands and supports the need for regulations where circumstances necessitate action, however if they are not well designed, made overly complicated and not effectively implemented, they will cause frustration, pushback and not have their desired effect. As I am sure you can appreciate, farmers are natural stewards of the environment and it is in a farmers' least interest to degrade his primary asset – his waterways and his soil.

The committee notes in Paper No. 1 that Queensland's agriculture and resource industries, as in other states and territories, are subject to a plethora of formal and quasi regulatory requirements. CANEGROWERS agrees, and provides as an example to the committee, the recent plethora of regulations and technical notes introduced ostensibly to protect the Great Barrier Reef were imposed on predominately one section of the community in the coastal catchments adjacent to the GBR was excessive, complex and needlessly bureaucratic.

Under the Reef Regulations, cane growers in the catchments of Wet Tropics, Mackay Whitsundays and Burdekin were required to comply with the numerous regulations and technical notes. The following is an overview; detail can be found on the government's Reefwise Farming website:

1. Environmental Risk Management Plans – for growers in the Wet Tropics growing above 70 hectares of commercial sugarcane.
2. Soil testing to determine organic carbon rates in the soil
3. Nutrient calculators to determine the optimum amount of fertiliser to apply to the crop so as to not overfertilise and risk nutrient run-off
4. Record keeping for nutrient
5. A series of technical notes dealing with organic carbon abnormalities in soil testing
6. Technical notes on calculating nutrient inputs from legumes, millmud and irrigation water when determining optimum amount of fertiliser
7. Nutrient Environmental Risk Management Plans should growers need to apply more than the calculated optimum amount of fertiliser
8. Compliance with conditions around fertiliser trials in the Burdekin to determine optimum amount of fertiliser
9. Chemical accreditation to apply four PSII herbicides namely diuron, atrazine, ametryn and hexazinone
10. Record keeping for chemicals including the registration number of the chemical and nozzle number used when applying herbicide
11. Mandatory 20 m setbacks from watercourses when using these PSII herbicides
12. Five metre Environmental Vegetated Treatment Areas when using PSII herbicides
13. Chemical Environmental Risk Management Plans
14. Integrated weed management plans
15. Nutrient management plans
16. Reporting for ERMP's
17. Grower reviews / audits for compliance with the above regulations.

CANEGROWERS believe the regulations are overly complicated and difficult to understand by growers needing to comply. Furthermore, the regulations are discriminatory, targeting only canegrowers and graziers in the GBR catchments and between cane growing regions and size of enterprise, with cane growers in the Wet tropics above 70 hectares required to complete ERMP's.

The State Planning Policy: Protecting Wetlands of High Ecological Significance in Great Barrier Reef Catchments took effect on 25 November 2011 as part of a protection package for the Great Barrier Reef catchments also places onerous regulation on growers, even for conducting their ordinary farming practices.

The cane industry has and continues to advocate best management practices to support productivity, profitability and environmental stewardship. The Australian sugarcane industry has developed a number of industry products, training programs and best management practices that have assisted growers improve and maintain productivity, profitability and stewardship over the last 30 years. As an outcome from recent policy discussions, these elements will be brought together into a successful consolidated industry-driven Cane BMP program.

CANEGROWERS will lead the development and implementation of the Cane BMP program and assist sugarcane growers achieve BMP recognition through industry leadership and government support and the outcomes will be far more effective than regulations in delivering the Queensland Government objectives under Reef Plan. Once the Cane BMP has been developed, CANEGROWERS expects the Regulations under the Great Barrier Reef Protection Amendment Act 2009 to be removed.

The Queensland sugarcane industry is ready to expand and can be a big driver to achieving the government's target of doubling agricultural production by 2040. However, with regulations forbidding farmers to use their farm in the way that can deliver the best outcome for their profits, their productivity and the environment, the Queensland sugarcane industry will not be able to reach its potential.

CANEGROWERS supports the current efforts undertaken by the Queensland government to reduce the regulatory reporting impacts on agriculture and for using the sugarcane BMP as the mechanism to further promote economic development while balancing environmental protections.

Yours sincerely



Steve Greenwood
CHIEF EXECUTIVE OFFICER