

QUEENSLAND CHICKEN GROWERS ASSOCIATION



PO Box 12009, George Street, BRISBANE, QLD, 4003
Level 6, Primary Producers House, 183 North Quay, BRISBANE
Phone: (07) 3837 4747 Fax: (07) 3236 4100

ABN 86 881 788 599
Email: brad@gff.org.au

17th August 2012

Agriculture, Resources and Environment Committee
Ph: 3406 7908
Fax: 3406 7070
Email: arec@parliament.qld.gov.au

Dear Committee Members,

Thank you for the opportunity to make a submission to the Agriculture, Resources, and Environment Committee of the Queensland Parliament on methods to reduce regulatory burdens for the agriculture and resources industries.

The Queensland Chicken Growers Association (QCGA) is the peak body representing Queensland's meat chicken farmers. QCGA works on behalf of our members to secure a sustainable future within our social, economic, and political environment. Our industry is a significant contributor to the Queensland economy, with a gross value of production of more than \$370 million, and growing at the rate of approximately 4% per year.

We clearly want to state our support for the intention to reduce regulatory burden and in general agree with the methods proposed in the Issues Paper published 13 July 2012. We agree with the stated aims of a commitment to whole-of-government policy and the consideration of means other than regulation to achieve those aims. We also accept the need for regulation to achieve various social, environmental, and economic objectives and understand the need to balance net benefit for the community.

However, we would like to see the balance of environmental protection not overstated against the creation and growth of economic development in our industry. In our industry, we believe that there is scope for continued and even greater self-regulation in certain areas, for example, biosecurity, food safety regulations and environmental impacts in general. The current regulatory requirements on the poultry industry by all three levels of government variously overlap and create cost and administrative burdens, inconsistencies, disincentives and operating stress.

The QCGA was heavily involved in the development of the *Queensland Guidelines for Meat Chicken Farms*, and fully supported their publication on the website. Specifically designed to give Guidelines to inform both applicants who were applying for approval to extend existing farms or build new farms and councils in their decision-making. However, they have gone no further to informing a consistent policy position for all our stakeholders. We would welcome an even stronger position so that the Guidelines form the basis for informing local planning schemes.

QUEENSLAND CHICKEN GROWERS ASSOCIATION



PO Box 12009, George Street, BRISBANE, QLD, 4003
Level 6, Primary Producers House, 183 North Quay, BRISBANE
Phone: (07) 3837 4747 Fax: (07) 3236 4100

ABN 86 881 788 599
Email: brad@gff.org.au

Without their implementation, there is continued uncertainty in our industry as meat chicken farms are subject to differing planning and approval schemes across different boundaries. The value of our industry as a contributor to the Queensland economy and in particular its importance to the economy of South-East Queensland is being eroded by the inconsistencies in planning decisions, and red tape across jurisdictions.

When trying to achieve a balance between the development of the meat chicken industry and the concerns of the community. In our experience, a majority of concerns from the community are unfounded when investigated and utilising available scientific data. Therefore, whilst not discounting the definitions of environmental harm and environmental nuisance contained in the *Environmental Protection Act 1994* we make the point that the impact of our industry is often overstated by magnifying potential and not actual concerns. These issues are currently constraining our ability to grow as an industry, and are an example of the imbalance between environmental protection and economic development.

With local government currently the administering authority for Environmentally Relevant activities for poultry, this devolvement can be problematic for consistency. The formulas developed on behalf of the Queensland Government by PAE Holmes to determine separation distances between meat chicken farms and sensitive receptors, and the need for site-specific data in addition to modelling data are welcome specifics to inform the ongoing development of our industry.

These methodologies are consistent with the *Environmental Policy, Air Quality* odour guidelines and we note that they refer to impacts at sensitive receptors not at boundaries. Local government often interprets this as no offsite impacts. The education of government staff involved in planning decisions in the use and application of these formulae and the complex reports that must inform *the site* and sizing of new poultry facilities will ensure consistency and reduce regulatory stress.

We support the recommendation that the Department of Agriculture Fisheries and Forestry become a concurrence agency to assess the environmental component of the applications for both the expansion of existing farms and the development of new farms. This is a vitally important step in ensuring consistency in the treatment of Development Applications. The current impediments to both expansion and new farm development both in terms of cost and time is affecting potential exit strategies for those enterprises currently under pressure thorough urban encroachment and perceived conflict of use with peri-urban neighbours. Many farms are located in areas where under current local government planning schemes they cannot expand nor can they relocate because of the difficulties associated with developing a Greenfield site.

The SEQ Regional Plan has also put another layer of complexity in terms of relocation of farms. Normally the growers wishing to relocate would fund this from the proceeds of the sale of their property, which would have been rezoned for development that is more intensive. This option is now not available in many areas due to the restriction on subdivisions, in particular with regard to rural residential development.

QUEENSLAND CHICKEN GROWERS ASSOCIATION



PO Box 12009, George Street, BRISBANE, QLD, 4003
Level 6, Primary Producers House, 183 North Quay, BRISBANE
Phone: (07) 3837 4747 Fax: (07) 3236 4100

ABN 86 881 788 599
Email: brad@gff.org.au

The Vegetation Management Act also creates problems for both growers seeking to relocate and for development. Even if a grower can redevelop a site in terms of lot sizes to fund the relocation, the current interpretation and application of the Act and Regulations can significantly affect the viability of the project. Ideally, the construction of new farms should be in well-treed areas. The application of the VMA often makes this problematic.

Whilst the draft Guidelines generally adhere to the Best Management Practices currently employed within the industry, when local government are carrying out environmental compliance activities, as the tier of government currently charged with this regulatory responsibility as well, any guidelines in place for new developments cannot be enforced retrospectively. In particular, this caution is with regard to approvals given which may have lesser separation distances or odour requirements to new developments.

For action recommended to improve the performance of an existing facility, if the Guidelines were to be adopted, they would only be a reference, as the original conditions of approval must take precedence to safeguard a farmer's right to farm. This is an example of where self-regulation has been successful and gives the farmer certainty in his future either to continue farming or to sell his business as a viable concern.

We wish to remain involved in the process of fine-tuning regional plans, in particular the South East Queensland Regional Plan 2009-2031 and to ensure that local planning schemes allow for the establishment of chicken farms within the Regional Landscape and Rural Production Area. It is necessary to hold to the concept of rural production within a rural zone, however due to cautionary measures for biosecurity reasons; it is not conducive for meat chicken farms to be closely situated in rural precincts. This concept was dealt with in the Draft Guidelines.

The industry will continue to be at the forefront of informed evidence to assist future planning for minimal impacts and research into amenity impacts of emissions. We will continue to work closely with state and local governments to ensure the industry is able to address the challenges of the future. We look forward to working together to achieve acceptable solutions in order to maximize the opportunities to grow this industry to its potential in this state.

We thank you for considering this submission and would welcome the opportunity to provide further contribution if requested.

Yours sincerely,



Jodie Redcliffe
President