



**Agriculture, Resources and Environment
Committee
Inquiry into the
Nature Conservation (Protected Plants) and Other
Legislation Amendment Bill 2013**

JULY 2013

Queensland Farmers' Federation (QFF) is the peak body representing and uniting 16 of Queensland's rural industry organisations who work on behalf of primary producers across the state. QFF's mission is to secure a sustainable future for Queensland primary producers within a favourable social, economic and political environment by representing the common interests of its member organisations'. QFF's core business centres on resource security; water resources; environment and natural resources; industry development; economics; quarantine and trade.

Our goal is to secure a sustainable and profitable future for our members, as a core growth sector of the economy. Our members include:

- CANEGROWERS,
- Cotton Australia,
- Growcom,
- Nursery and Garden Industry Queensland,
- Queensland Aquaculture Industries Federation,
- Queensland Chicken Growers Association,
- Queensland Dairyfarmers' Organisation,
- Queensland Chicken Meat Council,
- Queensland United Egg Producers,
- Flower Association of Queensland Inc.,
- Pork Queensland Inc.,
- Australian Organic
- Fitzroy Food and Fibre Association,
- Pioneer Valley Water Co-operative Limited,
- Central Downs Irrigators Limited, and
- Burdekin River Irrigators Area Committee

Thank-you for the opportunity to make a submission on the *Nature Conservation (Protected Plants) and Other Legislation Amendment Bill 2013*.

QFF represents a significant group of agricultural industries that are subjected to regulation under the *Nature Conservation Act 1992 (NCA)*. The comments of the Federation in no way prejudice the opportunity our members may take to provide their own specific contribution to the committee's inquiry.

In March 2013 QFF made a submission on the *Review of the Protected Plants Legislative Framework—Consultation Regulatory Impact Statement (Consultation RIS)*.

Further, QFF is supportive of the intention of the *Nature Conservation (Protected Plants) and Other Legislation Amendment Bill 2013* and notes the Decision Regulatory Impact Statement (DRIS) recommends a revised version of option 2 be implemented.

General Comments in response to Bill

QFF has consistently called for governments to address the burden of red-tape through regulatory reform. QFF supports the goal of the Bill; to reduce business and government costs, improve environmental outcomes by adopting a risk based approach to regulation where low risk or usual activities will be either self-assessable or exempt from permitting or licensing requirements. In particular, the exemption of low-risk activities from permit and licence requirements in respect to vegetation clearing is very welcome.

In developing this response QFF's comments have been kept broad, with the view that specific agricultural commodities that deal directly with the system and legislation are best placed to deal with the detail of the amendments.

Specific comments relating to the Decision Regulatory Impact Statement

Integration with related Acts:

QFF is disappointed to see that there is no change in option 2 to include integration with the *Sustainable Planning Act 2009 (SPA)* and *Vegetation Management Act 1999 (VMA)* as this is not supported across government at this time. QFF notes the integration with other assessment processes is essential. The opportunity to integrate the NCA with the VMA is now as the VMA is currently under review which presents the opportunity to align the compliance requirements of the Acts, and to present a single compliance framework for vegetation management which will enhance regulatory consistency across the state.

Communication and Extension of Compliance Requirements:

Communication and extension of compliance requirements has been less than adequate and must be improved, particularly in relation to the interactions between this framework and other legislation relevant to plant protection. QFF notes that the implementation of option 2 will address these concerns.

Option 3:

QFF supports the notion that option 2 supports regulatory simplification in the short to medium term, and will not prevent government implementing option 3 as part of future reforms when government and industry are in an improved regulatory position. QFF encourages the Queensland Government to further investigate strategies identified in Option 3 such as co-regulation and a self-assessable code in more detail for vegetation clearing, and combine with the harvesting and trade components of Option 2. This will enable industry to build on existing industry frameworks to reduce compliance costs for both industry and Government whilst maintaining robust environmental outcomes which also provide adequate coverage for the nursery and garden industry.

Conclusion

QFF appreciates the opportunity to comment on the Bill that is the first stage of amendment's that are required to facilitate implementation of the Protected Plants Legislative Framework. QFF is committed to working with the Queensland Government in the implementation of the new framework and legislation. If you require further information, please contact QFF Sustainable Agriculture Policy Officer *Adam Knapp* on (07) 3837 4747.

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