Dear EAREC

Please accept the following material as a submission to the EAREC Strategic Cropping Land committee.

The analysis of the most prolific farms in the local area is supported by the mapping and data included in the document.

In summary:

- Subjecting the volcanic soils of the South Burnett soils to the same SCL criteria as the outer suburbs of Innisfail is problematic.
- Slope set at 5% for the highly productive volcanic soils will only protect 37% of the cropping land outside Kingarov. 37% as a success rate is a failure.
- Partitioning the red volcanic soils of the South Burnett into a 9th SCL zone would allow the slope to be re-set to 8%. This would give a protection rate of 95%. This would be considered commendable and in line with the intention of the legislation.
- The shortcomings of slope set at 5% was predicted and acknowledged by DERM on page 42 of the technical assessment document on the DERM website.
- Any subsequent assertion by DERM that red volcanic soils between 5% and 8% slope are not the "best of the best" cannot be sustained. Ample evidence is available to the contrary.
- DERM has not explained why this amendment to the SCL suggested by KCCG cannot be enacted. It has no unindented consequences to other regions or to the intent of the SCL legislation.
- It can only be considered a welcome refinement to the SCL objectives.

The maps and data that accompany this submission are largely self-explanatory, but should they need explanation, please call me on the mobile number provided.

Thank you

John Dalton

Secretary KCCG

A Submission to Strategic Cropping Land Committee

From: Kingaroy Concerned Citizens Group

This letter is to advise you of a problem associated with the Strategic Cropping Land (SCL) legislation currently before the Parliament. The aim of this legislation is to protect Queensland's best cropping land from development by mining and energy projects, and also from various other projects that alienate the land.

Most importantly, this letter also suggests a solution to the problem which would ensure that the legislation does a more refined job of protecting the soils defined as 'the best of the best'.

Summary

• Valuable red soil areas in the South Burnett are not protected due to slope. This has been acknowledged by DERM in its technical assessment of SCL.

- The solution is to add a 9th SCL criteria to protect red cropping soils in the South Burnett of up to 8% slope.
- These soils are currently growing peanuts, maize, soybeans, wheat, barley, navy beans, popcorn and sorghum in many cases for more than 100 years and will not be protected unless 8% slope in the South Burnett is recognised as SCL.

Background

The SCL task force's first report on their work trialling the criteria for soils in different areas, recognised and noted that some areas of the red volcanic soil types would miss out on protection because the obviously highly productive land was above the 5% maximum slope. (refer to page 42 of the Technical Assessment Report on DERM website)

This report also says it would be administratively complex to extend the allowable slope to 8%. It also suggested that because the red soils of the South Burnett have been grouped into the same SCL zone as the entire coast of Queensland, extending the slope to 8% might have a favourable result for the South Burnett volcanic cropping areas but would unintentionally protect less productive soils in the non-volcanic coastal strip.

Kingaroy Concerned Citizens Group organised the technical assessment team to visit the area and the result of this was that although 5% would protect many of the broad acre red soils, a significant portion of the undulating area around Kingaroy, Memerambi and Wooroolin would not be protected. Members of the technical assessment team suggested that soils above 5% were not considered "the best of the best" due to the extra slope, although they did not dispute the productivity of the soils above 5%.

Other Aspects

KCCG has recently studied the impact of DERMs intention to stick with the maximum 5% slope criteria with the result being that only isolated pockets of highly productive land will be protected. A greater proportion of equally productive land between these protected areas will be available to damaging projects such as bauxite mining and Underground Coal Gasification. Exploration for bauxite has recently been completed in these highly productive paddocks.

Technical Assessment Team claims that soils above 5% are not the "best of the best" cannot be sustained.

Three affected farmers who have a combined total of 171 years of experience on these farms maintain that:

- Production on paddocks with slope of 5% to 8% have equal yield as those below the 5% threshold.
- Production on paddocks with slope of 5% to 8% have at times a **higher** yield than those below 5% as they are on scrub soils, and the elevation gives them a longer cropping season and less frost. Most dry land farming (Eastern Darling Downs) might yield maize at 1 tonne/ acre in an average year. The paddocks in this study consistently yield 1.5 tonnes. This can be verified by the three farmers who assisted with this study.
- The only discernable difference in farm management (and input costs) in the 5% to 8% cropping zone is the periodic maintenance of additional plough over contour banks, which amounts to only a couple of additional hours of tractor work in any one year cropping cycle.

All cropping areas have their particular geographical characteristics.

The Granite Belt needs higher input cost for hail netting, some areas choose to irrigate, and areas such as the Lockyer Valley and Condamine catchment loose production due flooding, but this does not preclude them from SCL.

By comparison, works on contour banks are minor. The South Burnett's red undulating volcanic soils have no need for netting or irrigation, and certainly no flooding. On a 100 ha farm with \$75 000 worth of yearly production, \$200 worth of tractor work to reverse plough a contour bank on 8% slope is a micro cost.

Recommendation

The South Burnett should be partitioned off from the Coastal Zone and the maximum slope lifted to 8%. This would be in the same manner as the Granite Belt has been partitioned from other SCL zones due to its unique features.

This is a simple strategy that recognises the unique character of this geographical zone, it gives the protection that the SCL aspires to, and eliminates the problems of 8% slope being used in areas where increases in additional slope are not required.

DERM has not responded to our suggestion, but KCCG suggests that it adds no more complexity than sectioning the Granite Belt from the Eastern Darling Downs zone. It is a 9th SCL zone and is easily defined by the current mapping of the elevated red soils of the South Burnett.

Concluding Remarks

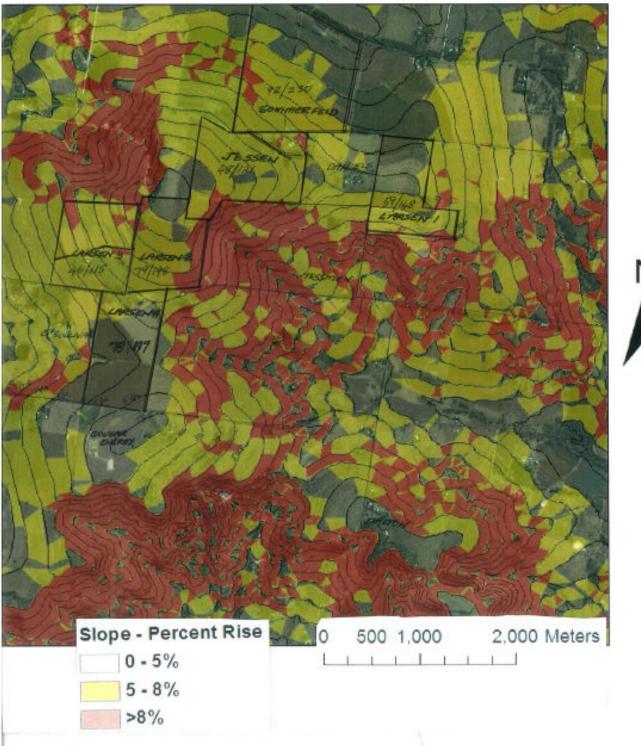
Kingaroy Concerned Citizens Group is hopeful that Queensland Members of Parliament will be diligent in their desire to refine legislation that needs refinement. The points raised in this letter highlight the shortcomings of the SCL criteria and more importantly, suggest a pragmatic response to the problem. The consequences of not getting this correct are a loss of protection for 65% of local food producing land. It could also allow permanent alienation of the land due to bauxite mining or UCG operations.

We are looking forward to all Members of Parliament supporting a sensible amendment to the legislation, and speaking in the house with resolve that reflects a threat to our food source.

Yours faithfully

John Dalton Secretary of the Kingaroy Concerned Citizens Group 0422 987 290

Coolabunia Elevation





STRATEGIC CROPPING EVALUATION

(3 FARM AGGREGATE ANALYSIS OF 5% SLOPE Vs 8% SLOPE)

Farm 1: Larsen			5% SCL		8% SCL	
Paddock	ha	acre	amount protected	area protected (acres)	amount protected	area protected (acres)
1	59	148	0.5	74	0.95	140.6
2	79	198	0.1	19.8	0.9	178.2
3	46	115	0.05	5.75	0.95	109.25
4	78	197	0.9	177.3	1	197
TOTALS	262	658		276.85		625.05
			area not protected	381.15	area not protected	32.95
			% Protected	42.07446809	% Protected	94.99240122

Farm 2: Jessen			5% SCL		8% SCL	
Paddock	ha	acre	amount protected	area protected (acres)	amount protected	area protected (acres)
1	48	121	0.1	12.1	0.9	108.9
TOTALS	48	121		12.1		108.9
			area not protected	108.9	area not protected	12.1
			%		%	
			Protected	10	Protected	90

Farm 3: Sommerfeld			5% SCL		8% SCL	
Paddock	ha	acre	amount protected	area protected (acres)	amount protected	area protected (acres)
1	92	230	0.4	92	0.95	218.5
TOTALS	92	230		92		218.5
			area not protected	138	area not protected	11.5
			% Protected	40	% Protected	95

3 FARM AGGREGATE SUMMARY			5%	SCL	83	% SCL
	ha	acre	amount protected	area protected (acres)	amount protected	area protected (acres)

3 Farm combined aggregates	402	1005		380.95		952.45
TOTALS	402	1005		380.95		952.45
			area not		area not	
			protected	624.05	protected	52.55
			%		%	
			Protected	37.90547264	Protected	94.77114428
			% Not		% Not	
			Protected	62.09452736	Protected	5.228855721

SCORECARD							
SCL 2011 RESULTS 5% SCL 8% SCL							
(Using QSA thresholds)	37%	D	95%	А			
35-50% D Low Ach. 50-75% C Sound 75-90% B High Ach 90-100% A Very High Ach		Failure (Low Achievement)		Commendation (Very High Achievement)			