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Committee Secretary  
Health and Environment Committee  
Parliament House  
George Street  
Brisbane QLD 4000  
By email: [hec@parliament.qld.gov.au](mailto:hec@parliament.qld.gov.au)

Dear Committee Secretary,

**Environmental and Other Legislation (Reversal of Great Barrier Reef Protection Measures) Amendment Bill 2021**

Thank you for the opportunity to provide input to the Health and Environment Committee, Environmental and Other Legislation (Reversal of Great Barrier Reef Protection Measures) Amendment Bill 2021.

Queensland Cane Growers Organisation Ltd (CANEGROWERS) is a not-for-profit public company with the sole purpose of promoting and protecting the interests of sugarcane growers since inception in 1925.

Representing over 70per cent of Queensland's sugarcane growers, CANEGROWERS is the peak body for the sugarcane industry. With 13 district offices in Queensland, our strong regional presence ensures that services and advocacy are provided in local communities as well as at the highest levels of industry and government decision-making.

CANEGROWERS supports efforts to understand and, where necessary, better manage the interactions between farming, water quality in the catchment, and the health of ecosystems within the reef lagoon. Growers have consistently demonstrated a strong commitment to improving practices for both productivity and sustainability benefits, including very strong participation in the Reef Rescue and Reef Trust programs.

However, ever-increasing regulatory intervention in sugarcane farming practices have not benefited either growers or water quality. In fact, it has reduced motivation of growers' to participate in voluntary programs and discouraged on-farm innovation. We therefore support any move to discuss a reduction regulation, and we encourage the Queensland Parliament to pursue a collaborative, voluntary and evidence-based approach to improving the resilience of the Great Barrier Reef.

Our detailed submission is provided in the following pages. CANEGROWERS looks forward to further opportunities to discuss these issues.

## Water Quality

- CANEGROWERS supports efforts to understand and, where necessary, better manage the interactions between farming, water quality in the catchment, and the health of ecosystems within the reef lagoon. Growers have consistently demonstrated a strong commitment to improving practices for both productivity and sustainability benefits.
- Hundreds of growers have been involved in water quality projects under both the Reef Rescue and Reef Trust Programs
- Over 80% of the cane area in Queensland is managed by growers participating in the Smartcane BMP program, with 35% of the cane area now managed by third-party accredited growers.

## Regulations 2009-2021

- CANEGROWERS opposes regulation of farm practices as successful farming cannot be based on rigid rules imposed by Governments. Regulation does not achieve improved farm practice and has the unintended consequences of creating mistrust and suppressing innovation. Voluntary programs are the only effective means of working with growers for real progress that takes account of the extreme variability in our farming systems.
- The 2009 regulations took the industry's SIX EASY STEPS program for nutrient management and used it to place a cap on application rates of nitrogen and phosphorus. Since then, the program's reputation with growers has declined and industry has been cautious in further innovations as these could be similarly misused in regulation.
- The 2009 regulations also required growers to develop Environment Risk Management Plans (ERMPs). These ERMPs were an exercise in paperwork that were held in poor regard by both growers and government staff. The requirement for ERMPs was eventually suspended.
- The 2019 regulations have:
  - further intensified the regulation of nutrient management,
  - introduced regulation of sediment management (despite sediment loss from cane farms not being a priority issue for reef water quality), and
  - required growers to obtain a permit before converting any land (> 5ha) to cropping (e.g., if converting pasture land to crop land).
- The additional 2019 requirements for nutrient management add unnecessary complexity, cost and frustration for growers with no benefit for either the crop or water quality. The additional requirements actually risk growers being encouraged to make unjustifiable departures from the SIX EASY STEPS recommendations, with potential for negative impacts on both crop production and water quality.
- In addition to complexity, the 2019 regulations force each grower to engage an 'appropriate' person to help develop and then sign-off on the grower's paperwork. This adds significant cost and delivers a slap in the face to growers who have been successfully using the SIX EASY STEPS program for many years, but are now required by law to be supervised by some external 'expert'.
- The 2019 regulations have therefore confused, alarmed, and angered growers. More complexity, more costs, more condescension.
- It is now clear that the case for regulation of cane farms (e.g., see the Regulatory Impact Statement of 2019) is flawed, as evidenced by:
  - Its intent to achieve certain farm practices, derived from the Reef Water Quality Improvement Plan, that cannot be achieved without growers sacrificing profits and district mills risking closure due to inadequate cane supply.
  - Its use of flawed measures and assumptions of the practices happening on farms, combined with unreliable estimates of the effect of different practices on water quality.

- Its dependence on porous economic analysis based on erroneous assumptions.

### **Reversal of 2019 Great Barrier Reef Protection Measures**

- We support the intent of the Bill under discussion. CANEGROWERS supports any measures that reduce the regulatory burden on growers.
- The additional regulations from the 2019 Act have created confusion and added to growers' frustration and anger with Government policies. Further, these regulations will have no positive impact on reef water quality.
- Our one concern with the proposed Bill is the implication of a reinstatement of ERMPs as a requirement for cane growers. Both industry and government found these plans to be a waste of time. This requirement should be deleted from the Bill.

Regards



Dan Galligan  
**Chief Executive Officer**