



**Submission to the Innovation, Tourism Development and Environment
Committee**

on the

***Environmental Protection (Great Barrier Reef Protection Measures) and
Other Legislation Amendment Bill 2019***

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Submitted and directed to:

A/Committee Secretary
Innovation, Tourism Development and Environment Committee
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The Australian Barramundi Farmers Association (AFFA) is the peak representative organisation for the Australian farmed barramundi industry. National production of farmed barramundi in 2017-18 was 7,000 tonnes, valued at more than \$70 million, with strategies in place to increase overall Australian production to 10,000t within two years and 20,000t by 2025.

Queensland production currently sits close to 3,000 tonnes per annum with an anticipated increase in production of less than 650 tonnes over the next two years. In short, the Queensland barramundi industry stagnates, while nationally the industry is on track to double production by 2025. The single biggest inhibitor to environmentally sustainable growth in Queensland is regulatory burden.

The ABFA does not support a one size fits all requirement that all new or expanded development will be required to demonstrate that there will be nil additional nutrient or sediment load as a result of the activity.

Our members operating in the reef catchments must already meet the strictest environmental standards and are committed stewards of the environment. Member farms undergo annual, voluntary third-party audits for ecoefficiency and the ABFA supports regulation that manages the real risks to the reef - however aquaculture is not the source of the problem.

Diffuse discharge of nutrients, soil, herbicides and pesticides from cropping, horticulture and grazing are proven serious threats to the reef, but aquaculture is recognised as not being a significant contributor to nutrient or sediment loads. Nutrient and sediment discharge from aquaculture ponds differs considerably from agricultural nutrient and sediment discharge, and certainly differs from other point source ERA activities such as sewage treatment plants, meat works, and mines.

CSIRO research has demonstrated that most nutrients from aquaculture are assimilated in the receiving environment, far away from the reef, and have had no adverse impacts. Introducing a zero-discharge regime on aquaculture will further stymie the growth of the industry in Queensland but will do nothing to save the reef.

We propose that nutrient and sediment loads be based on the residual nutrients after environmental assimilation in the receiving environment has been reviewed. In addition, discharge from barramundi farms can be demonstrably better quality than intake water. Therefore, the net load in intake water should be deducted from the net load released in the receiving environment. To do otherwise is to penalise our members for environmental services. Regulation must acknowledge this.

The ABFA is willing to co-invest in further research to model assimilative capacity of receiving waters, if there is a willingness from Government to respond with evidence-based policy and regulations.

We understand that for those releases that cannot be avoided by the design and operation of the activity, there will be an option to environmentally offset these releases (draft policy), however at this stage the guidelines for offsets are not confirmed and remain an uncertainty for our members in terms of allowable offsets, and cost and feasibility of implementation.

We also wish to take this opportunity to emphasise to the Committee that pesticide risks to the reef from land-based agriculture are recognised as a major concern, highlighting that the 2017 'Scientific Consensus Statement - land use impacts on Great Barrier Reef water quality and ecosystem condition' doesn't mention Aquaculture once, but pesticide is mentioned 19 times. Unfortunately, pesticide risk is currently outside the scope of the regulatory package.

In closing, the ABFA does not support a one size fits all requirement that all new prescribed and resource ERAs will be required to demonstrate that there will be no additional nutrient or sediment load as a result of the activity. We propose that nutrient and sediment loads be based on the residual nutrients measured after assimilation has been reviewed, and we seek recognition that barramundi farming is a responsible industry

that can play a significant role in the economy if its uniqueness is recognised in evidence-based legislation and policy.

It is extremely concerning that the Bill will put further constraint on development of a sector that has no impact on the Reef. The Queensland barramundi farming sector effectively stands still, while nationally the industry is on track to double production by 2025.

We believe that the points raised in our submission are consistent with the objectives of the Bill, and the proposed regulatory framework.