



15 March 2019

Committee Secretary
Innovation, Tourism Development and
Environmental Committee
Parliament House
Brisbane QLD 4000
Via email: itdec@parliament.qld.gov.au

Dear Secretary,

Submission

**RE: Inquiry into the Environmental Protection (Great Barrier Reef Protection Measures) and Other
Legislation Amendment Bill 2019**

Growcom is the peak representative body for Queensland horticulture and strives for the long term growth and profitability of horticultural farms and the industry. Our core membership consists of Queensland's fruit, vegetable and nut producers and individuals, groups and industries who have a stake or interest in the future of Queensland horticulture.

Growcom is an independent, commercially focused not-for-profit organisation that provides a range of relevant services to help members, clients and partners achieve greater success in the Queensland horticulture industry. Growcom is widely considered the "voice" of horticulture on issues common to all commodities and works to engender support for the horticulture industry in the community. Growcom embraces and promotes innovative, responsible farming and business practices. We are a progressive organisation with a strong track record and 95 year history.

Horticulture within the Great Barrier Reef catchment is worth more than \$800 million at the farm gate per annum, encompassing around 1200 farms growing 120 different crops. The region is responsible for the majority of Australia's bananas, tropical and sub-tropical fruits, mandarins, macadamias, avocados, sweet potatoes, fresh tomatoes and early winter vegetables.

Growcom welcomes the opportunity to provide comment to the Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Amendment Bill 2019 (inquiry). We provide this submission without prejudice to any additional submission from our members or individual farmers.

Growcom notes that the proposed Bill aligns to the Great Barrier Reef (GBR) Water Science Taskforce report recommendation, 2016, that regulations be used as part of a mix of tools to reduce nutrient and sediment pollution from reef catchments.

Whilst Growcom accepts there is a need for a well designed and well implemented regulation to ensure it has a positive impact on our industry, when a Bill such as the Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Amendment Bill 2019 is not warranted or appropriately targeted, or not well communicated or clearly understood, perverse outcomes arise. For this reason Growcom remains opposed to the proposed legislation and would prefer to see the state's investment used to assist growers with the financial burden of implementing on-farm practice change.

Growcom has extensive experience in the delivery of various programs to assist growers implement management practice changes. Through these we typically see voluntary change occur over a 5-10 year period. This is influenced by

- the need to invest in equipment which would typically have a 15 year life expectancy
- seasonal financial outcomes
 - production failure, market price fluctuations
 - impacted by natural disaster

Over the course of the past 10 years horticulture growers have invested \$3 for every incentive dollar invested by Australian Government Reef Trust. These initiatives provide multiple outcomes

- accelerated practice change
- reduced nutrients, pesticides and sediment leaving farms
- increased employment opportunities for those servicing the horticulture sector
- increased opportunities for skilled labour on and off farm
- investment into regional towns & communities
- improved productivity

Generally if community wants to accelerate adoption the best way to achieve this is via further investment. Growcom does not see regulation as a tool to address this issue of uptake.

For the past 10 years, Growcom has been working with growers in Reef catchments to improve on-farm practices and address the environmental impacts of agricultural run-off from farmland entering the Great Barrier Reef lagoon through our voluntary best management practice program, Hort360. It has been our experience that growers have embraced practice change and made appropriate on-farm improvements to limit their impact on the Reef.

Hort360 has allowed the horticulture industry to be guided by best practice to make decisions that work for farms and businesses without the need for government regulation. Continuation of voluntary programs, such as Hort360, will provide pathways to industry recognised certification programs and broader benefits to the sustainability of horticulture production systems than just meeting a regulation offset.

Given the diversity of our industry we see fit that these regulations, if introduced, should apply to all horticulture commodities to remove any potential disparity between crops and cropping systems. This would require an extensive research undertaking to inform an agreeable regulation position. Without adequate modelling per crop and associated research there will continue to be a disconnect between BMP standards and Reef regulation.

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We believe the addition of new cropping development rules will stifle the growth and diversification of the horticulture industry. Without the ability to rotate land and open new areas, we will most likely lose several crop commodities thus reducing market availability.

Growcom looks forward to further consultation with the Queensland Government regarding the proposed implementation of Reef regulations.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'David Thomson', with a large circular flourish at the start and a checkmark-like stroke at the end.

David Thomson
CEO Growcom