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

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15th March 2019

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Submission

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

The media release from for Environment and the Great Barrier Reef, Minister for Science and Minister for the Arts, The Honourable Leeanne Enoch, states that the new Environmental laws will give the Great Barrier Reef “the best chance of survival.”

The RIS sets out the objective of government action.

“Protecting the Great Barrier Reef is one of the Queensland Government’s six priorities under its plan, Our Future State: Advancing Queensland’s Priorities (State of Queensland, 2018). Progress towards this priority will be measured against the following targets for water quality at the end of Great Barrier Reef catchments:

By 2025, contribute to a:

- 60% reduction in anthropogenic end-of-catchment dissolved inorganic nitrogen loads
- 25% reduction in anthropogenic end-of-catchment sediment loads.”

The fact that what the government is aiming for in “the best chance of survival” means that agriculture is one giant, uncompensated risk management plan ultimately costing hundreds of billions of dollars.

The recent North Queensland floods highlight what PRA has said all along, that in a significant rainfall event there will be sediment regardless of preparation made.

Under these regulations it would appear that those people who suffered those catastrophic floods will be held responsible for the non-reduction in sediment and dissolved inorganic Nitrogen (DIN) which includes Nitrogen dissolved from soils.

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It is impossible to achieve reductions in the face of natural events such as these floods.

In other words, agriculture has been set up for failure.

That these regulations have been introduced before the North Queensland flood clean-up has been completed shows the clear lack of regard for Queensland's primary industries. Those producers who are currently the example of what can go wrong are being denied an opportunity to submit on this legislation with new evidence of consequences.

It is a common opinion that all of the people involved in that tragic rain event would be in breach of these regulations.

This government is in a bubble or it would have revisited this legislation as unworkable and unable to be complied with under all conditions.

That the legislation aims to reduce sediment by 60% in all catchments, river system by river system by up to 60% by 2025, shows that it is impossible to comply with as it depends entirely on rainfall in each catchment and the pattern of such rainfall.

How can this be accounted for in this legislation? The truth is that it cannot and it does not.

Using attendance or non-attendance at a course, any course, as an excuse for introducing legislation is deeply flawed and unfair methodology, particularly when it is sponsored by the now discredited WWF.¹

Modelling is also prominent in the methodology of this legislation with most of us being uninformed about the original underlying assumptions. PRA has constantly asked that these assumptions be released in an accessible and easily understood format. Those calls have been ignored but I suppose that when there is no empirical measure for the modelling to be based on, those assumptions are likely to be wildly inaccurate.

The government only has itself to blame for the fact that there is no accessible body that was once trusted by landowners to do research, development and particularly extension.

The government's own decimation of the DPI, where a trusted one stop shop for advice was replaced with a hotch-potch collection of advice of varying quality, sometimes funded and sometimes needing to be paid for.

A paper by AIMS, Water Quality Mediates Resilience on the Great Barrier Reef (MacNeil et al), attempts to quantify what factors will influence coral recovery and by how much. Conclusions are, based on assumptions and modelling, that the greatest manageable factor in recovery from coral bleaching which is predicted to be more frequent out to 2050 is water quality.

This is in spite of some relief from bleaching from increased sediment and turbidity being acknowledged. After all their assumptions, the conclusion is that there needs to be a 67% decrease in sediment and dissolved nutrients.

¹ <https://www.buzzfeednews.com/article/tomwarren/wwf-world-wide-fund-nature-parks-torture-death>



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However even then, that may not be enough to ensure recovery.

In other words, the agricultural community is indeed a giant risk management project, an enormous petri dish, costing uncompensated billions of dollars and with no guarantee that it is either necessary or will be successful.

This is the sort of experiment that one only attempts with other people's money and they have. It is all being done with agriculture's money with legislation which is a greedy grab for the time and money of those who feed and clothe us.

Only the [REDACTED] Greens could on the one hand endorse a scheme which denies fire mitigation which agriculture needs for its safety and promotes climate change action as the fire mitigation strategy,² and on the other hand accepts that climate change will cause more bleaching events and the possible mitigation actions and costs are to be again borne by agriculture.³

Once again, the legislation is impeccably timed, with most of the state in drought or flood, to cause maximum inconvenience and minimum resistance.

Regards

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² https://theconversation.com/to-reduce-fire-risk-and-meet-climate-targets-over-300-scientists-call-for-stronger-land-clearing-laws-113172?fbclid=IwAR3KmjiLJbeaZUYNnSCR_eneOjwx-MDxWy5f2lCS8XckjPxZX8ubXMBxcis

³ <https://www.marineconservation.org.au/study-shows-great-barrier-reef-needs-queensland-governments-proposed-farm-pollution-rules/>

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