

15th March 2019

Innovation, Tourism Development and Environment Committee
Parliament House
George Street
BRISBANE Q 4000

By email: ITDEC@parliament.qld.gov.au

Re: Submission response to the Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Amendment Bill 2019

Dear Committee Secretary

I support the protection and preservation of the Great Barrier Reef for future generations however I am opposed to the introduction of these proposed Regulations. The proposed bill extends regulation into the Southern canegrowing region and imposes an unfair and unjust economic burden on cane farming businesses. This is also without any acknowledgement of any of the hard work already undertaken in this region with minimal financial assistance from governments.

I am a proud third generation Sugar Cane Farmer from the Isis District and currently farm approximately 300 hectares of sugar cane just south of Childers. Currently I am Chairman of Isis Canegrowers, a position I have held for almost 3 years. I have been elected a Board member for this organisation almost 21 years. I have had a long association with the local Landcare group, serving many years as their Chairman and have also had the honour of serving as a Landcare representative Director for twelve months on the Burnett Mary Regional Group for Natural Resource Management. I have always had a strong interest in farming using environmentally friendly methods, something that was passed down to me by my father and grandfather.

My Grandfather, father and uncles made a conscious decision in the early 1970's that farming practices had to change. They were not aware back then of potential impacts to the Great Barrier Reef but were more aware that they could not afford to watch their valuable soil and therefore indirectly nutrients, leave the farm. They implemented a significant change to their farm layout by redesigning farm layout with a contour system that had an immediate effect of significantly reducing sediment/soil leaving the farm. They then undertook a process of building a number of farm dams, not only for the benefit of irrigation, but to also capture any sediment that did run off before leaving the farm. They were also supporters and participants of the Isis Land use scheme, which was a government sponsored process of removing sugar cane growing on the steep hills around Childers and other parts of the district in an attempt to eliminate the heavy erosion of these hills. Whilst this proved extremely successful in eliminating erosion, some growers claim it came at a cost as the land that made available for cane transfer was often less fertile and productive, however it was easy to farm being flatter land. Unfortunately, some of these steep hills are now being reused by tree crops, again increasing the risk of erosion.

One of the first changes I encouraged my father to adopt when I first came onto the farm was to trial green cane harvesting. Leaving full trash residue on the ground - initial benefits being moisture retention and weed control, with the ultimate benefit being a total elimination of soil erosion from

ratoon crops. Initially my father was reluctant to take this path due to the increased cost of harvesting, but after agreeing to trial a number of blocks over a two-year period, He made the decision to convert the whole farm to this method as the benefits far outweighed the costs.

In recent years I have implemented GPS systems on our farm, allowing me to implement a minimal till zonal farming system, undertaken in the low risk period for heavy rainfall. It follows a summer period where the previous ratoons are sprayed out and the green cane trash blanket retained. This effectively eliminates any chance of erosion on our fallow land through summer, where the probability of intense rainfall is often higher. As part of this process I also purchased a variable rate controller for fertiliser application. I can vary the rate of fertiliser on the go, according to the Six Easy Steps recommendations for each block. In addition, I also have a variable rate controller attached to my spray tractor to ensure the recommended herbicides are being accurately applied to every block.

In my role as Chairman of Canegrowers Isis I have actively promoted the benefits, from a farm management perspective, for our members to become BMP accredited. In my district we see BMP as part of 'the way we do business'. I am an accredited grower and currently working on my detailed Nutrient Management Plan which is part of an integrated individualised productivity plan. All of this with the aim of improving my farm's productivity, profitability, and long-term viability whilst minimising my environmental impact.

As a third-generation farmer following in the footsteps of previous generations in operating my farm according to Best Management Practices, I am extremely concerned about proposed reef regulations for my region (Burnett/Mary). These regulations in effect define me as guilty of damaging the Great Barrier Reef, putting the onus on me to prove my innocence. This is also an invasion of privacy without permission or consent and with no idea where my private information may end up. It concerns me that *compliance officers* will have more powers than police in obtaining this information. Putting people who may have no formal law enforcement training into such positions is unethical. In effect I will potentially be placed in a position worse than the standard legal position where the accused is always regarded as innocent until proven guilty.

Before regulations are introduced more monitoring needs to be undertaken to identify where potential sediment and nutrient runoff is coming from, as the majority of farm runoff in the Isis district does not enter either the Burnett or Mary river system, but discharges via either the Elliot or Burrum systems. At no time have growers in our district been informed directly of actual monitored results of nutrient discharges.

The majority of growers I speak to have told me that if it can scientifically be proven to them that their farming practises are causing harm to the GBR they would be happy to voluntarily change their farming practices. Farmers are no different to other members of the broader community and enjoy the beauty and wonder of the GBR. Unfortunately, governments of all persuasions have been guilty of publicly attacking farmers rather than sitting down with us and having meaningful discussions with us over our farming practices. My experience has shown me that working with farmers delivers far better results than working against them or putting their backs to the wall. Maybe it would be more appropriate for the government to incentivise reef scientists and extension staff to work with farmers in developing financially viable farming practices that minimises impacts to the GBR.

It also needs to be highlighted that when you fly over the southern cane growing region it shows there are many on farm water storages, tailwater dams and recycling pits designed to capture the

initial runoff from farms, all of which contributes to minimising the impacts of sediments and nutrients ending up in the wider catchments. I believe the best method of improving water quality leaving our farms is to have co-investment between government and farmers in developing on-farm nutrient retention and sediment traps.

It is my firm belief that reef regulations for our region should not be introduced without any formal independent consultation process in regard to developing minimum standards. To enact regulations before an appropriate community consultation process to develop manageable minimum standards is unacceptable to establishing an open and transparent process.

Another concern is the minimal investment in reef projects by all forms of governments in reef projects in the south when compared to the level of investment in the northern regulated regions. Thus, with no scientific reason for extending regulations to the south we are potentially being put at a financial disadvantage through a significant lack of operational resources to implement unjustified changed farming practices.

In conclusion, I have major concerns that the proposed change to reef regulations are an attack on my civil liberties and they fail to recognise the hard work I, and the majority of farmers in my district, have done to improve our viability and reduce our environmental footprint. I encourage governments and reef scientist to take a pro-active approach of working with farmers to achieve a win-win approach for farmers and the GBR.

Rather than taking this big stick approach, which often results in a negative response with farmers set up to fail and/or only delivering the regulated minimum requirements. We need to respectfully encourage farmers to continue to be innovative in the way they farm and change practices for optimum environmental health and sustainability.

Yours sincerely



Mark Mammino

MDM Farms Pty Ltd

