



CANEGROWERS Isis

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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

CANEGROWERS Isis strongly support the protection and preservation of the Great Barrier Reef (GBR) for future generations however we are vehemently opposed to the introduction of these proposed Regulations.

The proposed bill extends regulation into new geographic areas and imposes an unfair and unjust economic burden on cane farming businesses and the broader region without scientific justification. It also undermines the valuable efforts of growers to improve water quality, imposes big brother supervision over everyday farming decisions, threatens our right to privacy and will effectively cap our local sugar industry's ability to expand. This is particularly relevant to the Isis district where the Isis Central Sugar Mill has received state government economic development funds to expand sugar growing areas to secure mill throughput. This is an example where the state government has competing interests across departments. This proposed legislation effectively requires the same sort of environmental impact statement that a mining company does which will hobble industry expansion on land our growers already own and manage without government approval. It will negatively impact economic development and growth in agriculture in this region.

CANEGROWERS Isis also recognises the need to reduce the impact of farming on the nitrogen and chemical loads in waterways that feed into Burnett Mary Catchment. To this end, we have voluntarily implemented many programs locally including:

- Australian Government Reef (Reef Rescue, Reef Trust),
- Queensland Government funded Smartcane Best Management Practice program. In our district we see BMP as 'the way we do business' and do not require regulation. Our BMP program has achieved the following results with limited government funds and significant local industry funds and voluntary activity.
 - Benchmarked: 70% businesses - 11,937 ha;
 - Accredited: 11 businesses 2,737 ha with another 18 growers working towards accreditation; and
 - Recorded 298 individual practice changes with 73 growers (6month period).

The proposed regulatory framework will achieve little to protect the GBR, other than the introduction of an unnecessary level of costly bureaucracy, given that the government's own Water Quality Improvement Plan (2050 WQIP 2017-2022) identifies that even with 100% compliance of the region's 498 grower enterprises with Regulated Minimum Standards, we will only achieve a 16% reduction in Dissolved Inorganic Nitrogen (DIN) despite the government setting an unrealistic target of 70% reduction by 2025 for the Burnett River catchment. **Therefore, this proposed legislation and therefore agriculture and effectively our growers are being set up to fail.**

In our view the key to improved management practices is having a sound scientific basis for decisions.

While we recognise that the information used to inform the proposed legislation is "*the best available scientific data*," that data set is based on 'modelled' outcomes and consensus. The reliance on modelled outcomes, whilst the best available, does not provide sufficient empirical data that is useful to a precision farming enterprise. The model also relies on practice change to determine DIN loads and end of catchment limits which fails to identify what is actually happening on the ground. The government has had significant time and access to funds, yet it has failed to implement an improved data collection and water quality monitoring system in the sub-catchments that comprise the Burnett Mary region. This lack of actual data hampers the government's attempts to regulate an industry which has shown strong resolve to implement changed management practices through the SmartCane BMP program and long term use of Six Easy Steps (6ES). Farmers are well known for changing behaviour when presented with evidence based on fact as opposed to models.

This lack of contemporary data and the reliance of modelling also fails to recognise the significant challenge faced by the sugar cane industry in the Burnett Mary region by the surge (and associated significant land use change) in tree cropping and horticultural activities such as macadamias, avocados and sweet potatoes. In the proposed regulations, this competing land use (often side by side, neighbour to neighbour) has an unstructured phase in period and is at the very early stages of industry and government recognised best management practices. This disparity between horticulture and sugar/grazing effectively discriminates against the sugar cane industry and currently unfairly apportions blame for nitrogen and sediment issues in the southern area of the Great Barrier Reef on both Sugar Cane and Grazing industries alone.

CANEGROWERS *Isis* supports measures which support the integrity of GBR science and in the short term we request that the government delay any proposed implementation of this legislation in the Burnett and Southern Catchments until a thorough independent audit of the science has been conducted.

Extension of Legislation to Burnett and Southern Catchments

No justification has been given to extend legislation to the southern catchments. **The proposed regulation of sugarcane growing in the Burnett-Mary is unjustified based on its low significance for reef water quality outcomes and high economic burden.**

Section 79 of the Bill will result in cane growing in the Burnett-Mary region becoming an ERA and therefore subject to the existing (and any additional) minimum standards for sugarcane.

The inclusion of cane growing in the Burnett-Mary is an unnecessary cost to the public purse and to the growers in the region. The Burnett-Mary region is a low priority for interventions related to reef water, as reflected in the relatively modest reef program investments allocated to the region in the last 10 years.

In recent months (2019) CANEGROWERS in this region have been advised that they are unable and are effectively ineligible to apply for further Reef Trust funds on behalf of growers because available science has indicated we are of low significance for reef water quality outcomes.

Further, the contribution of cane growing to sediment and nutrient export is relatively low, due to:

- (1) its adoption of trash retention and other best practices, and
- (2) its rapidly declining area arising from conversion of cane land to macadamias, avocados and other crops.

In addition, this proposed legislation impacts the Burnett Mary catchment where agriculture is 13% of the Gross Domestic Product compared to the state average of 3%. Regional unemployment is already at 10%, means that regulations in the Burnett Mary Catchments will have a disproportionately high impact on the local economy – an economy which cannot afford this impost.

CANEGROWERS *Isis recommends that cane growing in the Burnett Mary not be defined as an ERA under Section 79.*

Decision Regulatory Impact Statement

The Broadening and Enhancing Reef Protection regulations – Decision Regulatory Impact Statement provided proof as to why the regulations should not be implemented in the Burnett Mary catchments. On page 5 it states that “The latest 2016 Reef Report Card (State of Queensland, 2017) as well as the 2017 Scientific Consensus Statement show that the uptake of improved land management practices is too slow, not widespread enough and the present trajectory of pollutant reduction will not meet the Reef water quality targets (Waterhouse et al 2017b).”

We dispute the assertion that previous efforts to improve water quality has not achieved sufficient change. Change has occurred and farmers have changed their practices. Six Easy Steps was developed and rolled out in the Southern cane growing region in the period 2005 – 2008 and has since achieved significant results and grower practice change (ie N reduction). The issue remains that growers and the broader industry measured practice change during this period however governments did not. We may have achieved the 70% target however this change hasn't been recorded. This achievement was long before its inclusion in any such minimum standards.

In addition, since this time a large percentage of our growers have already undertaken Six Easy Steps workshops and Soil Health Masterclasses. Therefore, we believe that there will only be small incremental improvements to be made in the Southern region moving forward in comparison with the Wet Tropics – another reason not to regulate.

As stated, many growers have adopted Six Easy Steps as a best practice methodology and the basis of their nitrogen application rates, however, the amount of nitrogen applied is based on crop use efficiency and any reduction below this Six Easy Steps rates will have a detrimental effect on production and therefore NUE and severely impact industry profitability at all levels. This is supported by van Grieken et al (2014) who reported that reduction of N rates from 6ES to the N replacement method reduced profitability. To reduce these rates substantially, as would be required to meet the 70% reduction, would make cane growing uneconomic. This would precipitate the demise of the sugar industry as all non-leguminous crops require nitrogen fertiliser for optimum growth. The provisions of the proposed

regulations, allowing for the legislation of ongoing/ further reductions in nitrogen application rates will therefore have a detrimental effect on the long-term viability of the industry.

Our position is further supported by the CSIRO report “Economic Analysis of Sugarcane Farming Systems for Water Quality Improvement in the Burnett Mary Catchment” by Martijn van Grieken, David Pannell and Anna Roberts (Jan 2014), where it was shown that to move small farms from C to B practices was unprofitable. The report also showed that dropping N rates below the (6ES) standard also reduced farm profit. This reaffirms our position that the proposed target of a 70% reduction in DIN is unachievable.

In addition, the Decision Regulatory Impact Statement also fails to take into account the main method of practice change recorded by the Reef Report Card is the reporting of funded projects (very limited number in the Southern region) with changes made outside government funded projects not recorded. For example, through analysis of local practice change (that is both voluntary and industry funded) that has occurred over the last 12-month period the Isis sugar growing district alone has achieved the following – 72 engaged growers who have implemented 298 practice improvements

Minimum Standards

The imposition of state-wide definitions of Minimum Standards is problematic and technically and agronomically flawed. Farming practices for the production of sugar cane need to vary to suit climate, weather, soil type, pests and diseases, topography, irrigation, enterprise mix and a host of other variables. To prescribe Minimum Standards that all growers must follow is unworkable given the variables involved and it doesn't logically follow that the practices used, which are not minimum standard, are inappropriate or detrimental to the Great Barrier Reef, in fact in many cases, the practices have been tested and proved impractical for particular farming systems, or it has been identified as uneconomic to implement on a small scale.

CANEGROWERS Isis recommends that the Minimum Standards should be developed and determined for the Southern region:

1. *before any legislation is enacted; and*
2. *a Community Reference Group established to review the minimum standards on an annual basis*

In conclusion, CANEGROWERS Isis believes the Southern region industry is being penalised unjustly by these proposed Regulations. It would be a sad day for Queensland when an elderly cane grower was convicted for breaching a Regulation based on data and evidence supplied by consensus and modelling as opposed to facts. It also acknowledges that it is in a cane grower's best interest to look after their soil health and reduce costly fertiliser inputs to the bare minimum to optimise profit and protect the Great Barrier Reef.

Yours Sincerely



Angela Williams
Manager

References

Martijn van Grieken, David Pannell and Anna Roberts. January 2014. **Economic Analysis of Sugarcane Farming Systems for Water Quality Improvement in the Burnett Mary Catchment.** A report prepared for the Burnett Mary Regional Group in cooperation with Natural Decisions. CSIRO Water for a Healthy Country.