

TO:

Acting Committee Secretary
Innovation, Tourism Development and Environment Committee
Parliament House, George Street, Brisbane Qld 4000

SUBMISSION

ENVIRONMENTAL PROTECTION (GREAT BARRIER REEF PROTECTION MEASURES) AND OTHER LEGISLATION AMENDMENT BILL 2019

INTRODUCTION:

Rural producers join all Queenslanders in applauding the sentiment underpinning this Bill. Certainly, our reef is a valuable asset in terms of tourism and bio-diversity. The Bill acknowledges that higher water temperatures are the major threat to reef sustainability but recognises poor water quality as a significant contributing factor.

It is also understood that continuing World Heritage Listing of the reef may be contingent upon introduction of measures designed to improve the resilience of the reef. However, there is a view that the listing in itself, is of little tangible benefit to the ongoing life of the reef.

I believe however, that the Bill is flawed in the way that it attempts to ensure that water quality meets the criteria identified in the Reef 2050 Water Quality Improvement Program.

It's my understanding that the targets identified include a 60% reduction in anthropogenic inorganic nitrogen loads and a 25% reduction in end of catchment anthropogenic sediment loads.

I OUTLINE MY CONCERNS AS FOLLOWS:

1. The enforcement provisions in the Bill are unnecessarily harsh. The provision for penalties of \$217,000 for a wilful breach and \$78,000 for other infringements characterises farmers as environmental vandals and virtual criminals on their own land. I understand that the principle involved here, is that the environmental impacts of a commercial activity should be contained on site and not be allowed to impact negatively, the environment or livelihoods of other people.

However, introducing such harsh penalties will foster resentment and mistrust between landholders and government. I am sure that given more time, an incentive-based approach will provide as good or better environmental outcomes than this unduly punitive model. For example, some financial institutions are beginning to quantify the natural capital in a farming business, and are considering ways to reward good management through reduced finance costs. Similarly, a public based environmental stewardship certification could provide producers with a marketing tool and consequent financial benefit.

Our producers are generally responsible people who are attempting to harness the natural resources at their disposal to produce food and generate income sustainably. They will respond more favourably to incentives than heavy handed regulation.

2. Another concern relates to the requirement to reduce anthropogenic sediment loads. Surely there are considerable difficulties involved in determining the amount of sediment that is due to human activity. Erosion can be exacerbated by poor management but there can be no doubt that it is also a naturally occurring process regardless of human intervention. How then, is it possible to determine whether targets based on anthropogenic sediment loads are met? I'm concerned that producers will be unfairly demonised by an inaccurate apportioning of sediment between their activities and natural processes.
3. I am aware that the proposed Bill will apply to the 6 Barrier Reef catchments. These catchments are geographically large and very diverse in terms of soils and weather patterns. Some areas are more prone to erosion due to soil type but the frequency of intense rainfall events that precipitate erosion, varies markedly. Generally, coastal areas receive these events more frequently than inland areas and yet the Bill proposes to impose the same level of regulation across all of the catchment area. This point also applies to leaching of nitrogen fertilizer.

Aside from the rainfall variation, the sheer distance from the reef to inland parts of the catchment must reduce its contribution to sediment loads and inorganic nitrogen levels. Many of the water courses contain weirs and dams which must significantly trap sediment. The likelihood of this infrastructure being encountered increases, in general terms, as we move further inland.

This one size fits all approach across the reef catchments is a significant anomaly that requires further investigation prior to introduction of the legislation.

CONCLUSION:

Based on the points that I have raised above, I have formed a view that introduction of the Bill, as proposed, is premature. There are significant issues which require further investigation. The extremely short timeframe for submissions on the Bill is also problematic and warrants extension.

Thank you for taking the time to consider my submission in regard to this proposed piece of legislation which has the potential to severely impede agricultural investment in the designated area.



Paul Francis

