

20 March 2019

Innovation, Tourism Development and Environment Committee

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

To the Members of the Innovation, Tourism Development and Environment Committee,

It is with frustration and disappointment that I submit a brief document with regards to the Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Amendment Bill 2019.

I would like to acknowledge that this submission is a late submission and to request that consideration is given to its contents as the extension period was not 'blanket'. The rush on this legislation has made it incredibly difficult (once again) for producers and the agricultural industry to be able to be actively involved in legislation that has such broad spanning and severe implications.

Given the complexity of these implications bullet points are hardly acceptable, however given the time frame of barely 13 days to prepare, they are the only prudent option.

- The Bill gives broad reaching powers to a single Government Minister, particularly with regards to the BMP process and what is or is not allowed to be included in this process. This sends a clear message to outside investors that Queensland agriculture is an unstable political landscape to do business in. The goal posts are already constantly being moved and this will only allow for further uncertainty moving forward.
- Across the 6 reef catchments, a VERY limited amount of real data has been used to formulate speculative models that at this point have not been verified or ground truthed. The legislative future of the Agricultural Sector is being based on flawed modelling and ideology. Neither are conducive to good governance or a long future for industry.
- Reducing whole property Land scores to the lowest common denominator, even if these are historically eroded sites, or only a very small portion of the property is unjustified and does little to recognise and acknowledge any repatriation that may have already been done on the sites. Nowhere in the Bill is any such work able to be identified and rewarded.
- There is no allocation or recognition in the Bill with regards to sediment run off for natural weather events.
- There is also no allocation or recognition or repatriation activities required by local Councils, cities and towns. Agriculture is being used as the scapegoat for all sediment load with regards to water quality issues because it is seen as the 'easy' target. Voters in town mightn't appreciate the need to have a Chemical Accreditation to use Glyphosate on their

gardens so the agricultural industry, who are the smaller voting population, are being forced to 'foot the Bill'.

- This legislation is in direct conflict with the 2018 amendments to the Vegetation and Other Amendments Bill. Given that vegetative thickening causes the barring off of soils directly affected by this Legislation, Landholders, who are no longer able manage these areas, are responsible for the sediment load that has ultimately been created by the Vegetation Management Act and the Qld Government. It would be wonderful if Government could decide what it actually wants to achieve and to then work with grass roots producers who know their country far better than a Satellite image does, how best to remediate these areas and what land types respond best to different management systems.
- The one size fits all Bill and the capacity for Government run departments to dictate farming practice is incredibly disturbing given that both CSIRO and the DAFF research projects are most often the last to pick up practices which are making ground breaking in roads into better and innovative ways forward for our industry. This Bill has the capacity to stifle innovation and remove the right for agriculturalists to work with their environment on an individual basis.
- Satellite imagery is not a reliable way to assess ground cover given the inaccuracies we have experienced on our property alone with regards to the classification sets defined in the Vegetation Management Bill.
- The Burdekin catchment has been given one year to comply with the legislative standards. Given much of the catchment has been and still IS under drought conditions this time frame is unworkable. It takes a minimum of 5 years for a business to recover from drought (speak to any banker) and it makes no economic or environmental sense to force change that will have little impact on the sediment load, particularly when the recovery phase begins. It will be impossible for many to reach these expectations in the time frame outlined.

As previously mentioned the time frame provided to be able to research and document workable ways forward for industry as opposed to this oppressive Bill was very limited. I would recommend that the Committee place great stead in the submissions from Mrs Josie Angus, Mrs Elisha Parker and Messer's Peter and Julia Anderson with regards to workable solutions and alternative options.

Regards,

Shontae Moran

On behalf of

Moran Trading Pty Ltd

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