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Inquiry Secretary  
Queensland Parliamentary Service  
Parliament House  
BRISBANE QLD 4000

SDNRAIDC@parliament.qld.gov.au

Dear Committee,

**Re: *Vegetation Management and Other Legislation Amendment Bill 2018***

Thank you for the opportunity to make a submission on the *Vegetation Management and Other Legislation Amendment Bill 2018*.

CANEGROWERS is the peak representative body for Queensland sugarcane growers and represents around 72% of growers. Membership ensures that growers' needs are represented at the highest possible levels of industry and government decision-making.

CANEGROWERS makes this submission having also contributed to and in support of the submission by the Queensland Farmers' Federation (QFF).

CANEGROWERS is disappointed at the lack of government-industry consultation in the development of the proposed amendments. It is essential that laws to manage native vegetation on Queensland farms strike a balance between environmental sustainability and agricultural production as farming underpins current and future jobs and economic security in regional areas. Therefore, consultation with key industry stakeholders to analyse the potential effects of the amendments should be an essential step prior to the introduction of new legislation.

Sensible and sustainable vegetation management policy is required so that farmers can manage their properties and businesses effectively. For this reason, CANEGROWERS supports the existing framework as being a solid foundation for the industry and opposes changes which inhibit the ability of farmers to grow their businesses or manage regrowth vegetation. We maintain that the existing policy forms a solid foundation for cane growing and agricultural production and any amendments should build upon the existing framework.

CANEGROWERS advises the committee that farmers, given the appropriate framework such as self-assessable codes in combination with best management practice guidelines, have proven they are best placed to make responsible decisions about the sustainable management of natural resources.

CANEGROWERS has two specific concerns with the proposed bill that relate to the following areas:



## **1. The removal of the High Value Agriculture (HVA) and Irrigated High Value Agriculture (IHVA) development approval provisions (see clause 16).**

CANEGROWERS maintains that HVA and IHVA are legitimate reasons for precise and considered management of vegetation and must be retained. The removal of this purpose is fundamentally against the interests of our members wanting to use HVA and IHVA provisions to sustainably grow or better manage their existing business.

### *Use of high value agricultural land in the sugarcane industry*

From 2 December 2013 to 5 February 2018 (4 years 3 months), there were 19 sugarcane development approvals under these provisions – 8 HVA and 11 IHVA.<sup>1</sup> Nearly all of these 19 approvals have been for small areas of clearing for specific purposes and the subsequent management actions will accommodate shifts in the agricultural footprint to combat climate change, realise better environmental outcomes, and increase farm flexibility and profitability. To put this in perspective, only 1,490.97 hectares (0.0037 % of the area currently under sugarcane production) were approved to be cleared under the provisions over the past 4 years 3 months.

The economic return and job creation derived from clearing HVA or IHVA land is incredibly high compared to the amount of land cleared. For example, the wholesale value of sugarcane is over \$5,000.00 per hectare and in some districts can be as high as two or three times this value. Many rural and regional communities rely on the considerable returns for these high-value industries for their economic wellbeing. The sugarcane industry provides a relatively high direct and indirect employment through the growing and milling activities on the relatively small footprint we maintain – something that is much needed in regional Queensland.

### *Broader implications*

The retention of HVA and IHVA management provisions are vital for both growers and millers. Most sugar mills are losing sugarcane area to other land uses and crops. Expanding production into new areas helps to maintain supply to keep the mill viable, it is not just a growth strategy. Evidence of this is the fact that most sugar milling companies have for some time been offering financial incentives to existing or new growers to bring additional land into cane production. At the very minimum, a viable supply area for a mill should be identified and made exempt from vegetation management restrictions to ensure economic security for the sugarcane communities in regional Queensland.

In addition, the Queensland Government promotes the need for increased agricultural production to feed the growing world population and has identified sugarcane as a critical feedstock for new biofutures industries, including renewable energy, and the jobs and economic activity they can create. However, the proposed amendments will jeopardise the industry's ability to expand and evolve to achieve those goals.

### *Ability to adjust the provisions*

If it is considered the current framework is too loosely prescribed, the response should not be to remove the provisions – it should be to adjust them. CANEGROWERS supports a robust framework for managing our vegetation in Queensland but the framework should be

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<sup>1</sup> Department of Natural Resources, Mines and Energy



workable. This could easily be done by strengthening the HVA and IHVA application requirements to prevent any perverse outcomes. Other options may include the use of industry Best Management Practice (BMP) programs or the use of reasonable environmental offsets. If the government can't realise these changes, then it needs to consider a new pathway for small scale, sustainable clearing that realises the large economic importance to rural and regional communities.

**2. *Category R*. 50 metre buffers and the definition of watercourses, wetlands and drainage features and its potential impact to cane production (see clauses 133 and 38).**

CANEGROWERS supports a vegetation management framework that has the scope to protect vegetation and the health of the Great Barrier Reef and business viability. Proof of this statement is supported by the fact that the health and maintenance of waterways, wetlands and riparian areas is identified in the Natural Systems module of Smartcane BMP, the sugarcane industry best practice program.

The problem with the proposed amendment is that it fails to recognise the diversity of ecosystems comprising a multitude of soil and vegetation types that exist across the catchments. Legislation must clearly define the different riparian zones. Buffer zones must be based on the size and significance of the relevant watercourse. A broad-brush approach to riparian zones will not achieve the desired outcomes.

CANEGROWERS advises that tailored guidelines, such as those imbedded in Smartcane BMP is the best approach to effectively manage our watercourses, wetlands and drainage features.

In addition, the arbitrary application of a 50-metre buffer zone does not take into consideration the definition of a waterway or opportunities for carbon trading and ecosystem services.

Further to these specific points CANEGROWERS, as a member of the Queensland Farmers' Federation (QFF), will be supporting the QFF position and its recommendations.

CANEGROWERS, along with industry colleagues, insists on an open and constructive consultation process on this *Vegetation Management Bill*. It is unfortunate that in relation to the Bill put before the committee, no such engagement has been offered by the Government and, as such, CANEGROWERS cannot in any way support the premise of the proposed legislation.

Thank you for your efforts in working with the committee to review the Bill and should the committee require further information, CANEGROWERS would be happy to assist.

Yours sincerely,

A handwritten signature in black ink, appearing to read "D. Galligan", is written over a light grey rectangular background.

Dan Galligan  
CHIEF EXECUTIVE OFFICER