



Herbert River District Cane Growers
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RE: Reef Water Quality Senate Inquiry

As a membership-based organisation, Canegrowers Herbert River represents 90% of cane farmers in the district which represents a large proportion of the Wet Tropics region. This includes facilitating the Smart Cane Best Management Practice (BMP) program in the district and also acting as Bargaining Agent for the Cane Supply Agreements (CSA) required to supply cane to the local Wilmar Sugar Factories.

Canegrowers Herbert River recognises the need to reduce the impact of farming on the nitrogen, phosphorus and chemical loads in waterways that feed into GBR lagoon. Cane growers in this district are proud of their achievements and are committed to helping maintain the health of their local environments including the GBR lagoon. Canegrowers Herbert River maintains an interest in the Reef Regulations to ensure its members are trusted and treated fairly and the information utilised to formulate these regulations is substantiated, correct and relevant.

Canegrowers are disappointed the Queensland Government have introduced a Bill that undermines cane grower's trustworthiness and capacity to record and maintain farm input records by empowering officers of the Department of Environmental Science to compel fertiliser sellers and agronomists to provide data on individual farmers. Furthermore, this allows the Queensland Government to obtain block yield data from mills to persecute growers. This particular information acquired would be very unreliable and inaccurate as the data mills capture is rough at best and only used for harvesting equity.

There is also a high probability that transaction costs incurred by each part of the supply chain to supply this data will most likely be passed onto growers.

It is also unclear how these powers will be used in a way that is consistent with the objectives of the Information Privacy Act 2009, which provide for:

- (a) the fair collection and handling in the public sector environment of personal information; and
- (b) a right of access to, and amendment of, personal information in the government's possession or under the government's control.

It is alarming the Queensland Government continually proclaims it has 'consulted with industry representative bodies and individual landholders to develop minimum practice standards to improve the condition of land managed under agriculture.' We acknowledge that meetings between the Queensland government and Canegrowers have taken place, although the Queensland Government has not listened or taken into consideration the viewpoints or advice that Canegrowers Herbert River or its members have provided previously as it has only fallen on deaf ears. The Queensland Government continues to be very selective when providing information and justification for the increased Reef regulations.

The recent Reef Report Card is an example of where all available information has not been included and the farm practice changes recorded to produce the results for the water quality modelling were limited to only one source, the Paddock to Reef program. It neglected to report the enormous amount of work and money that cane growers have contributed over the years from other programs including Smartcane BMP where a number of growers accredited (by third party audit) continues to grow, Reef Rescue, Reef Trust, and the Queensland Reef Water Quality Program.

There are also practices the Queensland Government are regulating in this bill which are quite pointless, including green trash blanket. If the Queensland Government had listened to the Canegrowers Organisations when it so called consulted

with us it would have not worried about including it in the regulations. The green trash blanket practice has been fully adopted for at least the last 30 years or so. This is a very unnecessary measure.

In the Wet Tropics, the highest priority region for reef water quality, 44% of the cane area (67,044.5 hectares) is managed by accredited Smartcane BMP growers and 86% (131,842.7 hectares) have been benchmarked. The definition of benchmarked growers includes growers registering for the BMP program and benchmarking their farming practices against the BMP standards. Therefore, we can positively announce that 86% of cane area in the Wet Tropics region is involved in Smartcane BMP.

Since 2014, Smartcane BMP has been working with cane farmers across Queensland to record and verify their practice improvements. This has helped set the record straight and secure growers' reputation as stewards of the land. We've focused on the three core modules of BMP so growers can become accredited and be independently recognised for their management of soil health and nutrients, irrigation and drainage, and weeds, pests and diseases. Becoming accredited in these modules remains the gold standard for Smartcane BMP. And we'll continue to focus on supporting growers to assess their practices and collect and collate farm records and other required evidence to achieve accreditation.

This neglect to include all farm practice changes is even more evident in the Queensland Government's statement in regard to the Sugar industry not adopting the practice changes quick enough. As you can see this statement is false as the Queensland Government has not allowed for the evidence provided in the previous paragraphs.

Some examples of practice changes which have been adopted from growers participation in the above programs include underground placement of fertiliser with a stool splitter, purchase and utilisation of fertiliser boxes, soil tests, laser levelling of paddocks for better drainage, GPS guided zonal tillage, the use of enhanced efficient fertiliser (EEF) products which are nitrogen products only. This list is not exhaustive of all farm practice changes. Also, the implementation of Nutrient Management Plans (NMP) have been very useful in assisting growers, however the Queensland Government is also wanting to regulate this and has stated it will contribute \$1000 to assist growers in paying for the service to obtain a NMP. This contribution is quite minimal amount as NMP true costs to growers are anywhere from \$6000 to \$9000.

To implement these changes and ensure their effectiveness, cane growers in the Wet Tropics region have invested in co-contributions of approximately 30 million dollars. The key to a successful program is allowing growers to have buy in to a program rather than dictating the terms and the ability for growers to innovate without over regulation.

As previously mentioned Canegrowers Herbert River do recognise the need to reduce the impact of farming on the nitrogen, phosphorus and chemical loads in waterways that feed into GBR lagoon, but over regulating the industry is not the answer and we have provided ample evidence over the last 4 years to demonstrate cane growers are changing and implementing practices to accommodate best management practices.

Thank you for the opportunity to submit this consultation paper and please be advised that Canegrowers Herbert River District also supports the submission lodged by QCGO.

Sincerely yours,

Frank Scardamaglia
Manager
Canegrowers Herbert River