

**SUBMISSION TO DEPARTMENT OF ENVIRONMENT
AND RESOURCE MANAGEMENT – DRAFT
BIODIVERSITY STRATEGY FOR QUEENSLAND**

14 APRIL 2011

Background

Queensland Farmers' Federation (QFF) is the peak body representing and uniting 16 of Queensland's rural industry organisations who work on behalf of primary producers across the state. QFF's mission is to secure a sustainable future for Queensland primary producers within a favourable social, economic and political environment by representing the common interests of its member organisations'. QFF's core business centres on resource security; water resources; environment and natural resources; industry development; economics; quarantine and trade.

Our goal is to secure a sustainable and profitable future for our members, as a core growth sector of the economy.

Our members include:

- Australian Prawn Farmers' Association,
- CANEGROWERS,
- Cotton Australia,
- Growcom,
- Nursery and Garden Industry Queensland,
- Queensland Chicken Growers Association,
- Queensland Dairyfarmer's Organisation,
- Queensland Chicken Meat Council,
- Flower Association of Queensland Inc.,
- Pork Queensland Inc.,
- Biological Farmers of Australia
- Fitzroy Food and Fibre Association,
- Pioneer Valley Water Co-operative Limited,
- Central Downs Irrigators Limited,
- Burdekin River Irrigators Association, and
- Queensland Aquaculture Industries Federation

The Queensland Farmers' Federation represents the interests of over 14,000 primary producers in Queensland's intensive agriculture sector. Agriculture is one of the two largest industries in regional Queensland, contributing over \$13 billion to the Queensland economy and employing over 60,000 people state wide. Over 70% of agricultural produce from Australia is exported, with Australia producing enough food to supply 60million of people across the globe.

The QFF and our members have been strategically engaged in the discussion on an appropriate policy for biodiversity management in Qld for many years. It is obvious that a goal for achieving greater resilience and biodiversity in the environment is important for any industry. This is particularly the case for farmers who rely on the environment to build a viable and productive business.

QFF provides this submission in response to the Department of Environment and Resource Management (DERM) *draft Biodiversity Strategy for Queensland*.

QFF acknowledges and agrees with the broad principles for biodiversity management that are outlined in the draft Strategy. QFF recognizes the importance of management at a landscape level in the agricultural zones (small coastal farms) and believes this should be an imperative of any proposed biodiversity plan. It has been noted that the fruit growing area of Stanthorpe is not included in the agricultural zone (page 6) and this requires revision.

QFF believes that a stronger emphasis needs to be placed on implementation of the strategy. To deliver this we need to see more decision making opportunities in the policy implementation. A standalone an extremely structured document that includes primary objectives, supporting objectives and principles is not adequate. While QFF is in broad support of the outcomes proposed in strategy, we are concerned that an investment plan does not sit under any of the priority actions.

QFF will focus its submission on general comments on agriculture and biodiversity that we would recommend incorporation of into the strategy.

1. Implementation of the Strategy into Existing Industry and Government Mechanisms

For many years the QFF has advocated for the recognition of a property scale Farm Management System (FMS) approach to property management. The voluntary FMS approach allows a farmer to take a look at their own farming operation implement an appropriate risk management framework and work to deliver farming practices that mitigate risks to the natural environment while maintaining farm viability. A profitable farming business is one that can proactively invest in not only environmental stewardship but also environmental rehabilitation. Industry organisations and government both have a role in supporting a farmer to implement a FMS. This has been recognised through the QFF FMS Framework, QFF's policy position on farm level planning, and the QFF- Queensland Government Memorandum of Understanding on progressing Farm Management Systems which was established in March 2005.

Implementation of an industry FMS is a detailed process, involving cultural change that requires intensive industry support.

With the loss of habitat values a key issue the biodiversity strategy needs to further explore and emphasise the importance of the integration of biodiversity into natural resource management projects. QFF regards the development of this strategy as an opportunity for the state government to implement biodiversity principles that can be delivered in parallel with other farm management practices and planning activities. This linkage is not explicit in the strategy.

Development of such a process could assist in the reduction of the loss of habitat values in intensive agricultural areas, particularly in areas considered to be more fertile, coastal and highly populated areas as well as promoting sustainable farming practices. The strategy needs to recognise and allow for multiple recognition frameworks for delivering biodiversity outcomes. While in many of our most productive and intensive farming systems there may not be huge outcomes that can be achieved in overall biodiversity restoration, a lot can be done in improving the current baseline. Any effort should find an equally appropriate recognition pathway if we are to change the cultural norms when it comes to recognising the value of good biodiversity.

2. Strong Focus on Incentives

Incentives can be seen as a vital tool in encouraging farmers to implement biodiversity initiatives and hence there is a clear need for the strategy to focus on this concept. QFF has seen the success of various incentive programs rolled out to assist farmers in their acceptance of increasing biodiversity values in Queensland. Such initiatives include the Nature Refuge and Nature Assist program run by the former Queensland Environmental Protection Agency. The Reef Rescue case study described in the strategy is noted and is wholeheartedly supported by QFF.

QFF is also keen to see the development of an “ecosystem services” environmental payments program. The strategy has shown the importance that biodiversity plays in maintaining ecosystem services in the community, a service that many farmers contribute greatly too. The federal government on numerous instances have deliberated the use of ecosystem services or environmental stewardship payments. QFF believes that this a perfect opportunity for the new strategy to focus on a similar platform to that of the Nature Refuge programs and also to further enhance other market based instruments. There needs to be a cooperative approach that allows farmers and other landholders that can manage their land to make good production decision that also retain biodiversity values and do not allow conflicts between profit and environmental conservation.

Some of the potential incentives that build both biodiversity values and on-farm profits are:

- Incorporation of incentives for carbon reduction measures that are part of the FMS; but above business as usual or current best-management activities;
- Shorter time frame covenant agreements that allow farmers to protect or improve biodiversity values without locking them into perpetual agreements that will not let them continue to make income on that portion of their land;
- Streamlining the legislative planning and processes (i.e development approvals and clearing permits) across multi layers of government to enable the landholder to be able to carry out farm management without unnecessary red tape , and
- Incorporate incentives that can better utilise industry, network and neighbourhood partnerships for wildlife corridors, catchment plans and regional biodiversity outcomes. This could include a comprehensive well managed off sets program that recognises the connectivity and landscape values that can be represented on-farms or multiple farms working together.

3. The Need for Biodiversity Indicators

As previous papers have indicated there is distinct lack of biodiversity indicators across Australia. This issue makes it difficult for not only the strategy to be assessed, but for the assessment of the effectiveness of other NRM initiatives.

QFF would also like to highlight that industry FMS systems currently incorporate much of the proposed adaptive management cycle detail (page 52) that is the focus of the draft biodiversity strategy. The industry FMS's have been developed to ensure that best management practices, which include but are not limited to environmental, water

management and reef protection measures deliver many of the same outcomes as proposed by the draft biodiversity strategy.

QFF recommends a stronger link between government, research and development groups and industry organisations to establish what gaps currently exist in biodiversity assessment. QFF would also advocate a strong funding source to develop any tools that were identified in this process.

4. Comments on Ecosystem Services:

The ecosystem services debate has not advanced very far in Australia and the enormous complexity of issues raised in the strategy reflect why. What is needed, and what could be the focus of the strategy, is developing the early steps needed for implementation of ecosystem services.

These could be:

- Audit of existing resource condition, collation of all existing known environmental audit material into a single national information resources, with priority then focused at plugging the gaps. This would be best done collaboratively at the national level.
- Identification of industry practices to define which ones deliver a biodiversity outcome. This would require further investment in such programs.
- Identification of potential 'buyers' for ecosystem services. Using both the carbon trading and existing water examples and possibly the Green Offsets program in Queensland.
- Building on existing initiatives. Trying to invent a brand new wheel that the public (and hence the Government) is not yet prepared to pay for makes little sense. Further research on its elements does add value. Adding to existing initiatives makes more sense such as building biodiversity offset as a possible add-on to carbon trading e.g. work in FNQ NRM or the CFI, building on water quality initiatives and consumer pricing to provide incentives e.g. SEQ Healthy Waterways.
- Broader recognition of good practices in the marketplace. There is no premium for 'good practices' for food producers. Maybe we need to build it, starting with an appropriate recognition system for Best Practice (as opposed to good practice) which could build on the new 'Australian Grown' labelling scheme, and promotion of that in the marketplace.

5. Government Regulation

QFF recommends that in moving forward the Australian and State Government's should forget regulation and support systems that recognise and encourage proactive management of significant biodiversity areas and indeed reward subsequent improvement in regional biodiversity.

QFF supports the overall concept of the proposed governance structure outlined in the strategy. QFF advocates that there is a need for industry to be involved in the process and recommends that QFF is included as a key stakeholder in the Ministers' Council on

Biodiversity. Government needs to balance the needs of farmers by having representatives in the biodiversity expert reference panel to ensure that the research data and scientific links used in the biodiversity framework is appropriate to the farm sector.

The State Government should invest in bringing an industry perspective as well as the catchment wide perspective approaches together to deliver an industry and environmental outcome that encourages an improvement in biodiversity by supporting voluntary approaches that deliver enduring change and overall improvement in landscape health. This cannot be done without also recognising that these are productive and economically important landscapes as well. This economic value is in the end what will support long term improvements in biodiversity.

Conclusion

QFF and its members recognise that Queensland has great natural assets that we all have the responsibility to look after. That is why it is imperative that this strategy links into the national strategy and other regional initiatives to ensure clear and realistic outcomes can be achieved in delivering greater biodiversity throughout the state and nation as a whole.