

Comment on Productivity Commissions Draft Report “Regulation of Australian Agriculture”

South Coast Natural Resource Management would like to comment on the Productivity Commissions Draft Report “Regulation of Australian Agriculture”. South Coast Natural Resource Management Inc. is an incorporated, community owned organisation formed in 1994. It is the peak regional natural resource management (NRM) group in the South Coast NRM Region of Western Australia working with the community to improve our environment by preserving and protecting unique plants and animals; managing agricultural land and waterways sustainably and economically; and sharing knowledge and skills in natural resource management. The South Coast NRM region encompasses an area from Walpole in the west, east to Esperance and north to Tambellup, Mount Madden and Salmons Gums and out to the three nautical mile State marine boundary.

Landuse Regulation

Draft Recommendation 2.2

Industry and Government should both be investing in better land holder knowledge and skills regarding land use and land capability and should not be recommending increased clearing to increase potential production. Effort in other areas of the farming operation should be the focus that helps maximise financial and environmental return on existing production (such as market development and value adding). Reduction of inputs/overheads should be a priority as well as incentives (e.g. whole farm nutrient mapping can reduce the application of fertilisers to where they are required saving tens of thousands in production costs effectively increasing your return).

Remnant or riparian vegetation provide essential environmental and agricultural services and contributes to overall farm longevity and sustainability. These include –

- Biodiversity values – protects and enhances the gene pool and maintains effective healthy ecosystems
- Habitat for native flora and fauna
- Soil stability
- Management of water tables and salinity
- Insect management
- Shelter for stock and crops
- Economic returns (tourism, firewood, fencing materials, bush foods, seed collection etc.)
- Cultural values
- Farm aesthetics and property value

Solutions for a productive and healthy environment

Focus should also be on preventing waste of production at all stages from grower to end user (in the kitchen), focus should be on market development and value adding the raw product, improving infrastructure, education in good quality and freshness rather than appearance.

- Argument that uncleared lands is costing the farmer needs to be based on opportunity cost, following assessment of fit for purpose agriculture.
- Investment in improving or encouraging different land use on marginal lands (alternative crops, perennial grass species or vegetation).
- Incentives should be available for farmers to protect and enhance natural assets on farm.
- Recommendation to encourage the development of best management practices regarding food production is supported. Incentives to adopt sustainable agricultural principles (on-ground, support advice) is strongly supported.
- Farm businesses should be treated like any other industry, standards regarding off site impacts or on natural assets should be the same as any other industry
- Government and industry investment in educating urban/peri-urban land managers in biosecurity and increase awareness of current acceptable farm practices (when they harvest, spray, increased vehicle movements etc.).
- Support the right for landholders to veto resource companies accessing lands if not invited/wanted.

3 Environmental Regulations

Draft Recommendation 3.1

- Agree that proposals can be risk based. Should not dissolve the responsibility of the farm manager. Issues such as biosecurity, water management and biodiversity management on farm should be a priority given current best management practices and farm longevity/sustainability. Any assessments should be done by a third party and not self-assessed.
- Departments should have better communications with a focus on positive outcomes and reduce political decisions over good science
- Agree that any assessments on clearing proposals be conducted at landscape scale and on individual properties. However this should not affect individual farmer responsibility or decisions being made based on the natural assets or vegetation corridors their property may contain. Any application to modify habitat, flora or fauna need to consider vegetation corridors, refugia and buffers. A landscape or bioregional approach can also allow for the heterogeneity between regions to be better taken into account in both regulatory and investment decisions, which is essential as landscape needs and appropriate management practices vary from region to region.
- Agree that any proposals consider economic, social and environmental factors (Triple bottom line). Natural Resource Management and Landcare is just as much about managing people as it is managing the natural environment. Farmers have the largest effect on environmental resource condition and their voluntary participation is essential in getting positive

Solutions for a productive and healthy environment

- environmental outcomes. However the protection of EPBC species is very important and should continue to have strong legislation and oversight. It is dangerous with attributing an economic value to EPBC species as it can lead to decisions made on this basis alone negatively affecting its long term viability. Any species on the EPBC list are there for a reason and require specific management to remain viable.
- Environmental offsets are an important management tool and should be assessed on a case by case basis... Scattered paddock trees may compromise precision agriculture machinery use, but are known to be valuable habitat for EPBC species nesting sites.

Draft Recommendation 3.2

- Supportive of government buying environmental outcomes and services, consider tax or other incentives for conserving natural assets on farms.
- Supportive of market based approaches to native vegetation and conservation.
- Supportive of building landholder trust in environmental regulators.

Draft Recommendations 3.3

- Supportive of using landholders and NRM organisations to deliver on sustainable agricultural works, extension and support to the agricultural industry.

General Comments on report

- Respondents in the report are only from the agricultural sector (recognised in the text) which perhaps should be counter balanced by views of conservation bodies. Also various industries support and work in the agricultural sector who seemed to be under-represented.
- Effect on natural assets on farm can have both private and public benefits. Maintaining a healthy remnant or riparian zone, managing surface or subsoil water and considering use of marginal lands all contribute to a more sustainable farming enterprise. It is also important to recognise that any export off farm (saline water, soils moved through erosion or declared pest species or other pollutants) across boundaries remains the responsibility of farmer to correct. The report statement regarding maintaining vegetation on farm is more a public benefit is incorrect, healthy vegetation and perennial grass species can manage off site impacts and maintain the health of the property (considering loss of land to salinity and other soil health issues).
- Supportive of improving communication between government agencies, improve responsiveness to enquiries by landholder (e.g. permits to clear or to do an on farm project that will enhance and support biodiversity). However this should not be at the cost of any environmental outcomes as threats and issues vary between areas and states and past investment has been poorly informed regarding local priorities (decisions being made that were poorly informed).
- There is strong evidence that trees on farms add value to farmland. Visual amenity, environmental services and longer term farm viability all enhanced with maintaining vegetation.

Solutions for a productive and healthy environment

- P16 and others – duplicative roles and regulation – agree to trying to achieve a simplified decision making process which avoids duplication.
- P22 – regulators need to improve communication and appear more flexible towards some environmental losses/harm as understanding of individual cases can be helpful – i.e. apply some common sense, to achieve better understanding and cooperation.
- P30 Agree - Better use could be made of market-based approaches to native vegetation and biodiversity conservation. This could include governments buying environmental services (such as native vegetation retention and management) from landholders
- P103 Agree - a large body of scientific research shows that regulation of native vegetation clearing actually benefits agriculture (WWF Australia, sub. 85, p. 1). This has not been comprehensively covered by this report.
- P106 Financial burden on landholders – while there is undoubtedly a cost to landholders, conservation of red tailed black cockatoo should be a cost worth bearing when the species is critically endangered, and Australia is a signatory to treaties and laws aimed at preventing species loss.
- P110 Agree – if the steps that landholders must follow to obtain approval to undertake a particular action are too burdensome, the landholder may decide to proceed without approval.
- P111 Agree – much vegetation mapping (South Coast WA) is either outdated, non-existent or inadequate – similar to Upper Hunter Valley example (p111).
- P116-117 Agree – time and cost burden to landholders by EPBC Act referral process – needs to be simplified.
- P132 Agree – recognition for landholders for costs involved of positive environmental management.

7 Biosecurity

- **Information Request 7.1 – illegal access on property**
- From an NRM perspective, increased access to properties can increase the likelihood of spreading biosecurity threats. Diseases such as *Phytophthora cinnamomi* (dieback) and weed species are significant farm and native vegetation threats. Investment by Government and industry into awareness can reduce the number of on-farm incursions. Activities that can support this include education, signage, infrastructure modification and or track diversion or closure. South Coast NRM and project partners have developed a State Management and Investment Framework to support improved dieback management, (GAIA Resources 2014).
- 7.6 ballast water – *changing the way ballast water is managed*. It is important to see this issue is receiving attention.
- P288 Agree - nationally coordinated polices under the IGAB would be beneficial.

For further information or if you would like to discuss any comment made in this response, please contact: David Broadhurst (Land Program Leader)

Solutions for a productive and healthy environment

