

Rambutan and Tropical Exotic Growers Association Inc.
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A grower based lobby group to foster the development of rambutan and other tropical fruit and tropical products in north Queensland through, the dissemination and adoption of latest research, regular grower meeting across the region and through linkages with other similar organisations and funding bodies.

Preliminary Submission to the Productivity Commission
re: *Impacts of Native Vegetation and Biodiversity Regulations*

Dear Sirs,

Rambutan and Tropical Exotic Growers Association Inc (RTEGA) is the grower based industry organisation who represents the interests of tropical fruit growers on the coastal production regions from Cooktown to Tully. RTEGA has linkages to Queensland Fruit and Vegetable Growers QFVG) and as our crops are also grown in the Northern Territory, links to the Northern Territory Horticultural Association (NTHA).

RTEGA was only informed of your inquiry several days ago and would like to direct our comments to the *Environmental Protection and Biodiversity Conservation (EPBC) Act, 1999* and the implications to our industry of the listing of the Spectacled Flying-fox (*Pteropus conspicillatus*) as a Vulnerable species under the EPBC Act.

Minister David Kemp listed the Spectacled Flying-fox (SFF) as a vulnerable species under the EPBC Act in May 2002. This Commonwealth listing was supported by evidence, at that stage, from an annual Population census survey that bat numbers were less than 80,000 in November 2000.

However the latest population counts have estimated that bat numbers have more than doubled to 187,180 in November 2001 and 194,903) at December 2002 (Sullivan 2003).

As SFF are highly mobile and the system of counting is less than scientific. RTEGA feels that it is unacceptable to base decisions that have horrendous impacts on the tropical fruit industry on such assumptions.

The Commonwealth stated that they believed electric grids were a major threat to flying foxes but they believed they do not have any jurisdiction over control methods. At the same time, growers' access to the use of electric grids under Damage Mitigation Permits issued by the Queensland Parks & Wildlife Service was withdrawn completely by Queensland Environment Minister. Dean Wells, for reasons of humaneness following requests from the RSPCA and environmental lobby groups.

As SFF are listed as vulnerable under the *EPBC Act 1999*, a grower with a Queensland Government permit to take SFF, should also refer this proposed action to Minister Kemp who will determine whether it would have a significant impact. If so, it becomes a controlled action, which needs his approval.

Massive changes were required by tropical fruit growers over a short period to protect their crops as the harvest season was less than 6 months away.

The only protection option left with growers was “limited shooting under damage mitigation permits” issued by Queensland National Parks and Wildlife Service. Permit numbers were restricted to 15 SFF per month for up to 3) months ie: 45 dead bats over a three-month period.

Industry had no phase-in period to adjust to the new requirements from Environment Australia (EA) and growers had simply to adjust as best they could to this decision. The electric grid system establishment costs were less than \$1,000 per hectare compared with permanent netting costs of more than \$20,000 per hectare.

The negative impacts of this decision have even extended to some growers having no crops to harvest as they were completely destroyed by SFF. Grower confidence in our industry is at an all time low.

This is extremely disappointing considering that export and domestic markets are growing with approximately 50 tonnes of rambutan exported from Cairns to Japan in the last season.

Horticulture is a long-term industry with many trees like mangosteen taking up to 10 years to commence fruiting. To this end, it is devastating for developing industries in Australia's regional areas, which create jobs and generate export income for Australia to have their 'operational rules' or their 'goalposts of sustainable management' being continually moved or removed to the detriment of their industry.

Summary

Therefore, the impacts on the tropical fruit industry of this biodiversity conservation legislation (specifically, the listing of the SFF) can be summarised as:

- The cost of adequately protecting crops from wildlife damage increased by 2000% in a matter of months (from around \$1,000/ha to \$20,000/ha),
- Those growers who cannot afford these costs face strict limits on their shooting permits and therefore experience serious losses of fruit.
- The administrative requirements growers must meet through the approval processes under both Queensland and Commonwealth legislation add additional management burdens and costs,
- The highly complex approval process has caused enormous confusion within the grower community and adds significantly to the business risk of managing a tropical orchard,
- The requirement to immediately change management systems has had a major impact on the investment capacity of the tropical fruit industry,
- The tropical fruit industry is bearing the full cost on behalf of the whole Australian and international community that supposedly benefit from the preservation of flying fox species,
- The cost of the tropical fruit industry shrinking rather than growing, as a result of these rapid legislative changes, based on unscientific assumptions, should be investigated and quantified by the Productivity Commission.

How can this be addressed?

As the use of a transition period apparently is not politically expedient for the declaration of a vulnerable species, then the availability of massive funding must be accessible for the affected stakeholders. As improved environmental, conservation and biodiversity values are important across the whole Australian community, industry organisations like RTEGA or individuals cannot be expected to carry the burden or blame for these problems and for funding the solutions.

An environmental levy must be established so that the whole Australian community can share in the delivery of improved environmental, conservation and biodiversity actions throughout our country. The Natural Heritage Trust (NHT) has a policy to fund community based environmental projects but will not fund projects, which have a component of capital items or research or which assist individual business enterprises.

Australia has a Medicare levy, and for a period of more than a year, an air travel ticket levy for displaced Ansett employees. So why not support Australian farmers to implement these improvements. Groups like RTEGA have no one to pass on the adoption costs of these new laws and community expectations.

There was one small project funded by EA (see final report) to assist with a demonstration of new netting systems for tropical Australia. Funding for this project was extremely difficult to achieve through EA after being rejected by the NHT in November 2002. NHT could be the vehicle for funding grower's requirements but the criteria would need to be changed under legislation.

There needs to be some form of national database established to link organisations and government departments. If RTEGA had known about this Productivity Commission inquiry a month ago, then it would have been better prepared for this meeting. This should also include the availability of funding to support organisations like RTEGA (who have no paid employees) who operate an e-mail system for the distribution of information between their members.

Industry organisations are struggling to keep up with the pace of environmental reforms in Australia. Concurrent with this PC inquiry, (growers are trying to take part in the preparation of a Water Quality Protection Plan for the Great Barrier Reef, coastal management planning for the Wet Tropics, regional NRM planning for the Wet Tropics under the Natural Heritage Trust, and water resource planning for catchments in the region.

Decisions by the various departments of the Federal Government need to be supported with sound science, peer reviewed and not based on assumptions from vocal minorities be they farmers or environmental lobby groups.

RTEGA looks forward to the continued discussions with the Productivity Commission on these extremely important industry issues.

Yours sincerely,

A. Zappala,
President,
RTEGA
28 July 2003.

Attachments:

RTEGA, 2003, Submission to Queensland National Parks and Wildlife Service, 6 March 2003.

Zappala. A.J., Final Report on NHT Project 38119, *Retractable Orchard Netting for SFF protection in north Queensland*, 12 May 2003.

Zappala Tropicals Pty Ltd, 2002, Submission to Wildlife Conservation Status, EA, 13 June 2002.

References:

Sullivan, S., 2003, *A report to QPWS, Cairns on the Annual SFF Census 2002*.