



Policy on Reef Water Quality:

Arrangements under the 2050 Water Quality Improvement Plan

Sugarcane farming is a major land use on the coastal plains and valleys of a number of river catchments that flow into the Great Barrier Reef (GBR) lagoon. Its impacts on water quality, through losses of dissolved inorganic nitrogen (DIN) or pesticides, may affect the ecology of both freshwater systems and inshore marine waters. In recent decades growers have significantly reduced impacts on water quality through changes in farm practice such as trash retention, improved efficiency of fertiliser and pesticide inputs and improved irrigation practices. Some of this practice change occurred through participation in one or more of the Reef Rescue and Reef Trust programs operating since 2008.

But instead of recognition for their efforts, growers have been consistently labelled as poor farmers in a series of Government Report Cards on Reef water quality. These reports are deeply flawed including their requirement for universal adoption of practices, many of which are either uneconomic or of uncertain value for growers. These report cards have effectively denigrated growers' reputations while being used to justify further regulation of farm practices.

The industry remains committed to reducing risk of water quality impacts on downstream ecosystems where such measures are practical, evidence-based and economically viable for growers. But there is widespread frustration, disappointment and resentment amongst growers about the Report Cards, and growing cynicism about the value of participating in programs such as Reef Trust. Turning this around will be challenging, but the first step is for all stakeholders to be aware of the issues and to take responsibility for addressing these.

Policy Position

CANEGROWERS will continue to support measures to minimise risks to water quality where these are:

- Voluntary;
- Proportionate to the environmental risk; and
- Consistent with an economically sustainable cane industry.

However, the arrangements under the Reef 2050 Water Quality Improvement Plan (2050 WQIP) require major reforms if industry confidence is to be restored and its ongoing participation secured. This CANEGROWERS policy outlines the required reforms.

CANEGROWERS is ready and willing to assist with these reforms, especially during the current Federal and Queensland Government review of the 2050 WQIP and its components.

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These reforms include:

- Any Government targets or objectives for additional voluntary adoption of practices must be agreed with industry and be tailored to the needs and opportunities of each district/basin.
- Responsibility for progress towards targets to sit with the entities that design and implement programs under the 2050 WQIP, and not with individual growers.
- Practices that are the focus of targets for additional adoption must align with the Smartcane BMP program.
- Targets for additional adoption must be based on industry-driven assessments of their relative merit, ease of demonstration, and other factors known to influence likely adoption levels and rates.
- Development of a fit-for-purpose program, for monitoring practice adoption from projects and their impacts on water quality, that ensures repeatability, sensitivity and reliability.
- Abandonment of the deeply flawed Report Card system for Reef water quality.
- Reality check on the extent to which practical and cost-effective changes to farm practice can contribute to the basin-specific targets for reductions in DIN.
- Growers are treated with due respect and regard, and all stakeholders must properly recognise growers' past and current efforts to reduce impacts on water quality.
- Development of basin targets for DIN that are not "all or nothing", and which are based on empirical relationships between DIN loads and the level of environmental risk.
- Industry participation in partnerships or collaborations to further reduce the risk of water quality impacts are underpinned by:
 - Analysis and planning at the district/basin scale, with local industry, of (1) the practices that are affordable, profitable, effective for water quality improvement, and currently under-adopted and/or poorly implemented; (2) the additional adoption that can be achieved with wise investment of resources; and (3) the design of appropriate on-ground programs;
 - Recognition that every farm is different with respect to its physical environment, management history and the needs and ambitions of the grower;
 - The industry's Smartcane BMP program, which is the pre-eminent resource for best practice guidance;
 - Commitment of all parties to the integrity and value of the SIX EASY STEPS nutrient management program and other industry-developed tools; and
 - Recognition of Smartcane BMP as a platform for verifying, recognising and demonstrating growers' achievements, for encouraging further on-farm innovation, and for helping translate new R&D findings into commercial practice.

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CANEGROWERS STRONGLY SUPPORTS:

- Additional RDE investment to identify and verify new opportunities for further reduction of DIN and pesticide losses, including enhanced efficiency fertilisers and constructed wetlands.
- Localised and participative water quality monitoring in all basins so growers can 'see' the quality of their local waterways and can help identify options for addressing any issues.
- Reviews of water quality science that put greater emphasis on industry's questions and issues; are truly independent; and that provide context on the relative importance of water quality for determining the health of the GBR.
- Further development of the potential value of new income streams such as Reef Credits as long as these have robust protocols and do not incentivise reduced cane supply.
- A broader focus on supporting the health of the Great Barrier Reef by working with industry and growers to minimise risks and support healthy catchments and reduced GHG emissions.
- Reconsideration of the need to include Burnett-Mary sugarcane in Reef policies and programs given its inherently low risk to the GBR and its reduced area relative to horticultural crops and other farm enterprises.

Additional background:

- Implementation of the 2050 Reef Water Quality Improvement Plan (RWQIP) with respect to the sugarcane industry has, to date, been seriously marred by a top-down approach to land management target setting and program design, unrealistic expectations by government, and unreliable and inappropriate reporting of progress.
- Current modelling suggests the existing DIN reduction targets cannot be approached without widespread reduction of nitrogen fertiliser rates below the guidelines derived from the SIX EASY STEPS program, resulting in widespread yield reductions and potential closure of mills.
- Efforts to undermine the SIX EASY STEPS program, such as promoting spurious linkages between block yields and optimal N rates, have further heightened suspicion of Reef policies and programs.

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- Efforts to achieve water quality targets have focused primarily on practice change programs funded through government “reef project” programs such as the Reef Trust Partnership, which have often had limited reach amongst growers.
- Progress is tracked through Paddock to Reef, a model originally designed to track the success of the reef projects but which was then tasked to model the progress of the entire industry, despite lack of reliable data.
- This progress was reported annually through the Reef Report Cards, which published “failing” grades for the industry year on year, with no reflection on whether the land management or water quality targets were attainable or meaningful.
- Based on these failing grades, the Queensland government passed the Reef Protection Regulations 2009 and 2019, which mandate a cap on the use of nitrogen and phosphorous.
- As a result, many growers have disengaged from government programs related to inshore reef water quality.

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