



31 July 2026

Ms A Moody
Qld Productivity Commission
By email: enquiry@qpc.qld.gov.au

Dear Angela

Queensland Productivity Commission review re Reef Regulations in Burnett Mary region

There have been some meetings and correspondence with Queensland Government ministers, officials, and departments since we last wrote to you in April.

Since that time, we have had face-to-face meetings with the office of Minister Andrew Powell and with the Special Commissioner for Rural and Regional Queensland, Andrew Cripps.

We have also met with Member for Burnett, Stephen Bennett and Queensland Senator and Nationals Leader, Matthew Canavan. All have been immensely helpful.

This correspondence is to reiterate the limited scope of our request, which directly supports the intent of the LNP Government's **Primary Industries Prosper 2050** blueprint.

As primary producers in this region we simply request independent scientific checking, not policy change, only as it relates to the Burnett-Mary portion of the 2019 Reef Regulations brought in under the former Labor Government.

This incorporates the electoral areas of Burnett, Bundaberg, Maryborough, Nanango, Callide, Hervey Bay, Nicklin and Noosa. This inquiry would provide a clearly defined, real-world scientific analysis to assess predicted environmental outcomes against observed results, alongside economic impacts in these electorates.

Our request is that that the Queensland Productivity Commission (QPC) undertake an inquiry into the *Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Amendment Regulation 2019 as it applies in the Burnett-Mary region*.

This is not about removing environmental protections, nor about changing or removing the Reef Regulations in their entirety.

It has been suggested to us by Senator Canavan that this state-level inquiry could be incorporated into the QPC's current inquiry into the impacts of the Commonwealth Government's Environment Protection and Biodiversity Conservation (EPBC) Act as it applies to Queensland.

We look forward to our opportunity to meet with you to discuss this further.

Yours sincerely



Dale Holliss
Executive Chair

Red tape strangling farmers in Central Queensland

Reef Regulations specifically in relation to Nitrogen and Phosphorus Budgets

Reef Regulations applied to the Burnett Mary region (home to Bundaberg region) in 2019 that have led to the requirement for Farm Nitrogen and Phosphorus (N&P) Budgets for sugarcane have created a massive layer of unwarranted red tape for farmers and their agronomists – but without any possible justification because the region simply does not impact the Great Barrier Reef. This has been spoken about repeatedly, but still the layers of red tape are applied in 2026.

There is as a result no environmental benefit for the Reef or any other land or water mass, but only financial and time-wasting impost placed on farmers in relation to fertiliser application around sugarcane.

Under the requirements for the creation of N&P budget a grower requires soil tests in the fallow, and an agronomist or a suitably trained grower creates the N&P budget based on the results.

If the agronomist is Nutrient Advantage qualified, they may be required to create three (3) recommendations from the one soil test ie: one to maintain the Nutrient Advantage accreditation, one for Reef Regulations and one for Smartcane BMP, especially where legumes are involved.

Once these recommendations are created and the required N&P is determined they then go into the N&P calculator used by the agronomist. As the soil test results from the past five (5) tests are used in the N&P budget the nitrogen and phosphorus numbers from those previous soil tests influence the total amount of N&P that can be applied to the farm. As growers do not wish to purchase five or six different fertiliser blends, an average blend for the farm is then recommended.

The grower orders the fertiliser blend, which may be customised, to fertilise the cane. This often needs to be ordered in lots of four to six tonnes - often far beyond the annual requirements for a farmer. As a result, a grower may have tonnes of unused fertiliser sitting in a shed - which may not be suitable for use in the following year if the subsequent N&P budget comes up with a different fertiliser blend.

The constant worry about being below or equal to the N & P budgeted numbers for nitrogen and phosphorus creates stress about prosecution for a product where flow rate and bulk density can change bag-to-bag leading to either under- or over-application of nutrients.

Fear of record-keeping around fertiliser application is also a constant and unnecessary worry for a farmer.

All this is for sugarcane alone - and yet in Central Queensland a farmer can also be growing an orchard crop such as macadamias, a horticultural crop such as melons, hay crops such as barley, legumes such as soybeans, or fertiliser pasture for cattle feed – all crops not subject to any limits to fertiliser application.

Note: Farmers in the Bundaberg region currently grow horticultural crops in their fallow which obviates the need to apply fertiliser when subsequently planting sugarcane. This is farming science at work in the most practical sense.

Three examples of cane and fallow crop rotations in the Bundaberg region include:

- Cane harvested in July, planted to melons in August, harvested November/December, planted to tomatoes in March harvested May to July, planted to melons in July, harvested in November/December and planted to cane in March.

- Cane harvested July-November, soybeans planted December, soybeans harvested April/May, potatoes planted May/June, potatoes harvested October, forage sorghum planted in November, baled twice with the final cutting and baling in April, planted to potatoes in May, potatoes harvested in October, soybeans planted in December, green manured soybeans removed in February for cane to be planted in March.
- Cane harvested in November, soybeans planted January, soybeans harvested in May, barley planted May, barley baled in September, cane planted in September.

Each scenario requires additional fertiliser to be applied to the non-sugarcane crop with no limitations. BUT a cane crop in the same paddock is limited. Why apply regulations to just one crop – especially when there is no need for those Reef Regulations because the Burnett Mary region does not impact the Great Barrier Reef?

Reef Regulations on new cropping land: unreasonable limits

Under the 2019 Reef Regulations any expansion of new cropping land (not just sugarcane) greater than 5ha requires a permit from the government. This is not required per land parcel or farming aggregation but per ABN.

If a business buys multiple land parcels and converts them from cane to orchard crops and remove the houses, sheds and maybe the horse paddock to add to the farmed area on multiple farms, it is the total area of the expansion that counts. It doesn't matter whether this expansion occurs over time ie: one property developed now and another in five years' time.

If the total exceeds 5ha a permit is required. If more than 100ha is developed a site-specific application is required even if the development is small relative to the size of the whole property but tips the ABN over 100ha.

Going forward – but pushing back with New Cropping land regulations

The Federal and Queensland governments *say* they are looking for crops to provide renewable “sustainable aviation fuel” (SAF). Under the current regulations, if this growing of crops occurs where there is no previous cropping history exemption then the New Cropping land regulations come into play.

For a development to facilitate the building of a plant to create the SAF a large displacement of existing crops or extensive expansions to new cropping land will be required.

The requirement of the permits for new cropping land adds to the time and complexity of establishing the farming land for the SAF crops.

In all, the whole regime around layers of regulation on farmers is inexplicably complicated, much of it is completely unwarranted (particularly Reef Regulations in areas well outside the Reef catchment) and completely unrealistic if the Federal and Queensland Government wishes to maintain – and grow - food security and secure the future of farming in our food bowl regions.

While Smartcane BMP (Best Management Practice) is the cane industry's flagship program for demonstrating environmental stewardship and gaining a pathway to Reef Regulation compliance, it has been a source of significant friction for many growers. In districts like Bundaberg, the "one-size-fits-all" framework often collides with local agronomic and economic realities in a multi species integrated farming system where cane is just one of over 124 different crops and one of two regulated crops that can be grown in the region.

The primary reasons the program often feels mismatched or impractical for local operations come down to a few key areas:

1. "It's Hard to Be Green If You're in the Red"

The financial barrier is a massive hurdle. While getting the administrative support or completing the modules online doesn't cost anything upfront, actually *implementing* the changes to meet the "above industry standard" benchmarks requires capital.

- **Capital Outlay:** Upgrading to precision farming equipment, changing over fertilizer rigs for banded applications, or installing complex tailwater return systems require significant money.
- **Constrained Margins:** With rising input costs (fertilizer, fuel, and past skyrocketing electricity rates for irrigation), many growers simply do not have the spare cash flow to invest in these changes, especially when there is no premium paid for "BMP-accredited" sugar at the mill.

2. Strict Nitrogen Caps vs. Local Yield Realities

The core of the Reef Regulations—which heavily influence Smartcane BMP's nutrient modules—relies on strict nitrogen (N) and phosphorus (P) budgeting.

- The reef regulations system relies heavily on generalized scientific modelling to mandate nitrogen application rates. What this system lacks is the flexibility to adapt and adopt nitrogen rates based on local trial results, especially for the high organic carbon soils that suffer a high degree of denitrification (nitrogen loss) during the growing season.
- There is a lack of flexibility based on using all available scientific knowledge. The maximum N & P Budget numbers for a property are mandated with no scope for increasing rates if particular circumstances arrived based on crop testing.

3. The Administrative Burden and "Tech Fatigue"

Running a cane farm is already a full-time physical and logistical job. Smartcane BMP requires extensive record-keeping to prove compliance across the core modules (Soil Health, Irrigation/Drainage, and Weed/Pest Management).

- While records for both BMP and reef regulation can be in any format for the majority this is hand written records for those that attended school to grade 8. Whether hand written or electronic records the majority take time to record at the end of work day that can be up to 14 hours long.

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4. Voluntary Program with a "Menacing Undertone"

Although Smartcane BMP is technically a voluntary, industry-led program, it is recognized by the Queensland Government as an alternative pathway to compliance. This creates an underlying tension:

- Growers often feel backed into a corner—comply voluntarily with the BMP, or face direct, rigorous scrutiny and auditing from Department of Environment and Science (DES) officers under the Reef Regulations.
- This dynamic changes the perception of the program from a helpful tool to celebrate good farming into a defensive, regulatory shield.

Most growers are already excellent stewards of their land—they want to keep their soil healthy and their inputs where the cane can use them. The frustration with Smartcane BMP isn't about a desire to

pollute; it's about a system that often prioritizes rigid, top-down bureaucratic metrics over the practical, localized economic survival of the family farm.

5. Smartcane BMP is incompatible with other crops

While Smartcane BMP works in regions where sugar cane is the main crop with some green manure fallow crops. Bundaberg is a region with over 124 different crops as part of a multi species integrated farming system. There is a generic horticulture BMP program "Hort 360" as well as some of the crops having specific best management practices that have been developed. None of the BMP programs actually integrate with each other especially when it comes to fallow management where the fallow crop is an actual commercial crop.