BUNDABERG AG-FOOD & FIBRE ALLIANCE

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Farmers Should be Farming, Not Filling in Forms

Bundaberg Ag-Food & Fibre Alliance (BAFFA) aims to identify, research, consult and solve challenges facing the Bundaberg primary production sector. We recognise the need for a united primary production industry across food, renewable fuel, fish, forestry, foliage and fibre sectors in the Bundaberg region to secure the long-term interests of our members and our industry.

The Bundaberg Regional Council area is predominantly rural, land is used largely for intensive irrigated agriculture and horticulture, notably macadamias, sugar cane, fruit and vegetable growing, and some cattle grazing. This reliance on agribusiness means that any negative impact on our farmers' ability to generate and market the crops and products they produce has a much greater impact on our community than in other areas.

BAFFA welcomes Senator Susan McDonald's call for real-world examples of red tape. Modern farming requires adaptability, innovation and farmers being out in the paddock. Instead, growers are increasingly bogged down by duplicative, overly complex, and ill-fitting regulatory frameworks that directly harm farm viability and productivity.

Key Examples of Red Tape Impacting Productivity & Profitability

Reef Protection Regulations & Multispecies Farming Systems

The current State regulatory framework under the Great Barrier Reef (GBR) protection regulations is fundamentally unsuitable for the dynamic, multispecies cropping systems in Bundaberg.

- Bundaberg growers cultivate over 124 different crops, often rotating multiple crops within a single paddock over a 12-month period. For example, a paddock may move from sugarcane in July to watermelons in August, tomatoes in March, back to watermelons in August, and sugarcane the following February. The current rules fail to clarify whether this paddock is classified as regulated sugarcane land or unregulated horticulture, creating legal uncertainty and compliance anxiety for growers trying to diversify.
- Mandatory N&P budgeting for regulated crops imposes an unjustifiable administrative and economic burden. We estimate a direct baseline cost of $3,000 per farm annually in administrative time and third-party advice, with zero demonstrable environmental benefit to local waterways. This cost directly erodes already tight family farm margins.
- Regulatory documentation is often difficult to interpret and lacks practical guidance for multi-crop operations. Rather than rigid compliance frameworks, government should adopt simplified, outcome-based approaches developed in consultation with industry.
- The regulatory framework relies on broad, catch-all assumptions rather than local catchment realities. As highlighted by peak industry campaigns like *Check the Science*, applying blanket Great Barrier Reef mandates without rigorous, catchment-specific evidence penalises compliant growers and forces unnecessary administrative burdens on farming systems that have no direct impact on reef health.

Overlapping Environmental Overlays, Fishways & Approvals
Expanding existing operations or undertaking minor landscape improvements routinely turns into a months-long administrative ordeal across multiple federal, state and local departments.

- Determining requirements for fishway permits, vegetation management, or environmental overlays requires growers to navigate complex mapping systems across disconnected departments.
- Hours spent seeking basic operational answers result in lost field productivity and delayed expansion. In worst-case scenarios, growers face threats of legal action due to unintentional non-compliance driven by vague or poorly communicated mapping layers.

Groundwater Reporting Portals & Connectivity Barriers
State reporting mandates increasingly require online entry through complex, multi-tiered digital portals.

- These systems appear designed for urban offices with high-speed internet. They fail to account for the reality that large portions of regional Queensland lack basic mobile coverage required to complete phone verification, let alone navigate complex online submission portals.
- Mandatory reporting often requires re-entering large amounts of data each time reporting is required.

Best Management Practice (BMP) Duplication
Industry-led programs like Hort360, Banana BMP or Smartcane BMP demonstrate best practice and environmental stewardship. However,

- Despite growers investing significant time and money to achieve voluntary BMP accreditation, state frameworks rarely streamline or reduce audit requirements for accredited farms.
- Growers end up completing double the paperwork, once to prove best practice to industry/market buyers, and again to satisfy government regulators.
- Industry-specific BMP programs lack cross-crop recognition and often don't deliver a clear market advantage or financial return, adding administrative effort without tangible reward.

Local Government Planning Constraints (Bundaberg Emerging Community Zoning)
Local planning regulations frequently treat rural activities through an urban planning lens.

- In areas designated under future planning overlays (eg *Emerging Community* zones), routine farm activities such as moving dirt for drainage, laser levelling, or dam maintenance can trigger full planning permits and assessments.
- Requiring development applications for standard agricultural earthworks adds hours of paperwork, thousands of dollars in council fees and months of delay for basic farm improvements.

Global Climate Goals
Federal and State climate modelling highlights shifting rainfall patterns in the Bundaberg region and ensuring farm resilience requires prompt infrastructure action, not endless administrative delays.

- In sugar cane, horticulture, and macadamia production, nitrogen-based fertilisers account for a large share of Scope 1 emissions. Accurately measuring and logging application rates, soil types, and timing to prove lower emissions footprint requires extra record-keeping. Focus can shift from actual day-to-day productivity and land stewardship to ticking regulatory boxes and meeting targets set by people far removed from regional realities
- Banks and insurers are aligning their lending criteria with climate risk assessment. Providing GHG and sustainability data is becoming a condition for securing loans, equipment finance, or lower insurance rates. It can feel like external environmental policies (from governments,

international supply chains, or financial institutions) are imposing heavy paperwork and compliance costs on traditional industries without providing the practical support or funding needed to manage the burden.

- Restoring Paradise Dam to its full original capacity is the single most critical factor for securing long-term regional irrigation needs. Delays in approvals, engineering assessments, and governmental decisions directly impact grower investment decisions and regional crop production.

Conclusion

With rising input costs across fuel, fertiliser, electricity, water, and labour, family farms cannot afford to act as unpaid administrative clerks for government departments. Reducing red tape will immediately unlock regional productivity, lower cost-of-production pressures, and ensure the long-term economic viability of the Bundaberg region.

Should you require further explanation please do not hesitate to contact me.

Yours faithfully

Tanya Howard
Company Secretary