



22 February 2016

Great Barrier Reef Water Science Taskforce Interim Report Consultation
Office of the Great Barrier Reef
GPO Box 2454
BRISBANE QLD 4001

Sent via email: GBRTaskforcesecre@ehp.qld.gov.au

Dear Sir/Madam

Great Barrier Reef Water Science Taskforce Interim Report Consultation

Thank-you for the opportunity to comment on the Great Barrier Reef Water Taskforce Interim Report. The Australian Sugar Milling Council (ASMC) is the peak industry organisation for raw sugar milling in Australia. The ASMC has six member companies and represents some 95 per cent of Australian raw sugar production. There are 24 sugar mills in Australia producing raw sugar, which is either directly exported or refined in four Australian refineries. Around 80 per cent of raw sugar is exported while most refined sugar is sold domestically. Sugar milling companies produce a variety of other final products, including ethanol, electricity, value-added cattle feed, molasses, and compost.

The sugar industry contributes to the social and economic wealth of many regional centres in Queensland and northern New South Wales. There is potential for further contribution in line with Queensland Government priorities of renewable electricity, biofuels and bio-products, even without expanding the area under sugarcane. At the same time, the industry is very conscious of its close proximity to the Great Barrier Reef and is committed to playing its part in improving water quality.

The ASMC and its member milling companies support the CANEGROWERS Smartcane BMP program and industry extension efforts to help growers reduce fertiliser and herbicide runoff to waterways. As such, ASMC also supports the CANEGROWERS submission to the Taskforce, in particular

- a hard target of 80 per cent reduction in nitrogen run-off risks disenfranchising growers, particularly those who have been working to better manage fertiliser and herbicide use and to generally improve their environmental management. The targets require clarification, explanation and a process for review.
- Previous approaches taken by government to achieve practice change need to be considered in the list of 'innovative approaches' to meet the targets. The co-investment approach of the Reef Rescue program has been a stand-out example of an approach that worked. During the millennium drought, the sponsored home visits to guide residents about how to improve water efficiency together with rebates for water efficient appliances and water storage tanks were particularly successful. Later, the home energy efficiency program was also very well subscribed. A similar direct financial subsidy or rebate to help growers fund technology or other improvements targeting a reduction in the risk of run-off from farms is recommended.
- There is acceptance across the sugar industry that it has a role to play in improving water quality on the reef. But there is a perception that growers are expected to

deliver the entire solution and this can impact on the willingness of farmers to make the change. Solutions need to come from all sources of water pollution (including urban and industrial uses) demonstrating everyone is responsible for reef water quality.

- Increased monitoring of water quality is vital to understanding the impacts and assessing the success of various approaches. Modelling the results may be cheaper, but are not adequate to test the benefits of different approaches. Benefits that can be clearly demonstrated will not only reassure governments that their approaches are working, but will also help to keep growers engaged.
- Coordinated and consistent extension activities and policy development are critical to getting the message to all land managers, industry and the community about reducing water pollution and managing the impacts on the Great Barrier Reef.

Sugar milling companies understand they have a role to play in managing water quality and are taking active steps through project work and the establishment of a new environmental committee. For example, AMSC and environmental consultants CQG Consulting have recently completed a risk assessment of re-cycling sugar milling by-products to farms and developed improved, regionally specific guidelines to reduce the likelihood of any increased risk of nutrient run-off to waterways and the reef.

Please contact our office if you wish to discuss any of these issues or ideas further.

Yours sincerely



Dominic V Nolan

Chief Executive Officer