Mulgrave Landcare and Catchment Group Inc.

ABN: 80 330 757 279

98A Norman Street
PO Box 215
Gordonvale QLD 4865
Ph/fax: 4056 1205
Mobile: 0408 205 561
email: mlcg@b

COMMENTS ON: The Draft Report -
Industries in the Great Barrier Reef Catchment and Measures to Address Declining water Quality.

1. General criticism of Gbrmpa in wet tropics region

.Information disseminated to stakeholders through publications such as this one is not accurately reflected in the public arena. Examples applying to our wet tropics "sugar catchment" are –

- Water quality is a major concern but greatest threat to reef is water temperature
- Landuse / water quality effects apply more to resilience of reef to pressures than to destruction of reef.
- Effect is on inshore reefs
- Conclusive evidence not yet in
- Dry tropics catchments are larger contributors of contaminants
- Sugar's alleged disproportionate effect arises from geographic coincidences together with physical contribution of contaminants.

The misunderstanding and misrepresentation of information is a hindrance to serious debate and affects the willingness of stakeholders to be progressive. Gbrmpa needs to rectify this.

2. Specific comments on draft report.

Support – recognition of economic and social value of primary industries
- recognition of there being a wide range of landuse-management performance.
- recognition that reward / penalty system is non existent.

Criticism - lack of realistic incentives scheme. Eg a quality conservation farmer in Mulgrave qualified for rates discount of equivalent to one carton of beer.

Support - no regrets policy. Intent is to stabilize and improve

Criticism - no regrets policy is not communicated AT ALL. Much of agricultural sector has fear that accumulated data will be used as hanging rope rather than tool for improvement.

Support - view that industry codes of practice and self regulation have low rates of participation.

Criticism - EMS is not pushed hard enough.
- sugar catchments not differentiated enough eg. irrigation vs. non irrig. Burnt cane vs. green cane harvesting, progressive vs. indifferent/obstructionist.

- **Support** - Fed/state /local memorandum of understanding
- **Criticism** - Local govt. not properly accountable. Eg no sewage inventory and no stormwater inventory. Point sources may be regulated but are often poorly monitored and poorly policed by regulating authorities.

- State and Feds drip feed environmental groups. 3 year plans needed.

Support - Regional planning eg Nrm Board Wet Tropics, with policy of priority projects and cost effectiveness.

Criticism - regional nrm plans will have difficulty functioning properly due to overlap of other Fed, State Regional and local govt plans. Same old system reshuffled.

3. Request for information re: management practices in sugar, rates of adoption & reasons. These comments are specific to Mulgrave River catchment.

Sediments –

(a)Loss of ground cover

- Nil land clearing. Most arable land cleared long ago.

- Intensive crop cultivation. For 4 out of 5 yrs in crop cycle ground is permanently covered by green cane trash blanket over approx 98% of mill area. Half of remaining year (Dec- May) is fallow. Preparation for fallow crop leaves ground susceptible to erosion for short period. Adoption of trash retention is low due to a) difficulty in physically incorporating up to 16t/ha of trash (high C: N ratio)
  b) incorporation time vs. getting cover crop established quickly before the wet.

  Bare ground during establishment of plant crop (May – December) is unavoidable.

  Loss of free, soil conservation assistance through DPI is a constraint in problem areas. This service should be reinstated by state govt.

  Local council, private development, Main Roads and Railway projects can result in significant .erosion events.

(b) Stream bank erosion.

- Wet season flows of tropical rivers are beyond the understanding of many planners.
- Fragmented vegetation does little to assist erosion control. Large scale reveg projects are required, with rock revetment being an essential component.
- Greatest impediment to landowner's adoption of watercourse rehabilitation is severe reduction in River Improvement Trust subsidy.
- Please note that much money spent on reveg. in the wet tropics will be wasted in flood destroyed projects unless a cost effective way to provide rockwork as an adjunct to reveg. is found.
- Pursuing this policy will result in greater (Mulgrave) farmer cooperation with Gbrmpa than any other single action. Given the present links between DNR / RIT / Catchment, assistance can easily be linked to adoption of industry best practice as a prerequisite.
- The continued support for catchment Groups in supplying cheap reveg outcomes for landowners is also essential.
- On lesser watercourses, many landowners are still unwilling to sacrifice even small areas of land to reshape and revegetate drains or to provide buffer zones. An incentive scheme is required.
- The stored sediment load of catchments is ignored. Many watercourses are choked by sediment from past practices and these will may nullify or mask improvements in management. River sediment budgets and management plans need to account for this.

Nutrients.

- That excess nutrient is being transmitted to the reef is still not accepted by some. The reason is possibly that awareness of the powerpoint presentations circulated by Gbrmpa is still low. Research supporting these claims is also not widely known at landowner level.
- The ideas of precision placement and strategic timing are understood but often not acted upon.
- The key to more rapid adoption is widespread research demonstrating inefficiencies of practices and actual requirements of crop, highlighting the direct dollar loss to farmers. A thorough dissemination of that information is critical
- A monitoring system to (a) measure losses from the crop zone
  (b) correlate farm practice and rainfall event to nutrient loss, and
  (c) trace pathways of nutrient from farm to end-of-river is required.
- The major impediment to landowner cooperation in water quality monitoring is the fear of the information being used to legislate against them.

- Loss of riparian filters –
  - little is being lost through intentional destruction.
  - much is lost through erosion and not replaced
  - much is lost through carelessness of fire, spray drift and weeds. Threshold densities are
  . very susceptible.
  - incentives to maintain existing areas are needed.

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- Urban sewage and stormwater. Are under suspicion of greater contribution to contaminant loads than previously thought. Need to be monitored and policed, and seen to be so.

Other Pollutants

- no acid sulphate problems as yet
- Herbicides and pesticides –
  As with fertilizer, key to adoption of best practice is demonstration of dollar cost to farmer of inefficient practices.
  Specific research needed with widespread communication of results.

Loss of filter functions in Coastal areas.

- No more clearing taking place. Done in the past.
- Riparian zones suffering bank erosion due to flood damage. Same issues as for stream bank erosion as above.
- Buffer zones are very limited. Incentives and buyback are the only likely possibilities.
- Protecting remaining filters. Fear of prosecution for damage to these areas is very effective. Reward system required for enrichment of areas.

4. Suggestions re: assessing land management performance and implementation of policy.

We are strongly of the opinion that land use management, even in regard to a specific industry, should be assessed on a catchment by catchment basis. This is due to the acknowledged differences in

geography and various practices, but more importantly because of the huge differences in the degree to which communities are meeting the challenge of improving environmental performance.

Those catchments that take a pro-active approach, capitalizing on the cooperation of its stakeholders to achieve a satisfactory outcome, regardless of the attitudes of their wider organizations or neighbours, should be rewarded. This can obviously take a myriad of forms, ranging from funding to leniency on difficult issues, to the right to continue a particular pursuit in that area.

In our opinion, the greatest impediments to improving the ecological values within the catchment are

- The attitudes of older landowners
- Resistance to giving up even tiny tracts of land and
- Cost associated with rehabilitation work, particularly those requiring rockwork.

The greatest impediment to improving farm management of sediment, nutrient and herbicides is the perceived lack of proof of losses from the crop, their effects upon the reef and the loss of income to the farmer.

The most important impediment to securing land user cooperation in monitoring and assessment programs is the fear of retribution. The no regrets policy or an x-year moratorium has to be widely communicated by Gbrmpa and accepted by the community.

We recap on our opening statement that the science gathered by Gbrmpa and their intentions for its use is not accurately reflected in the public view. A suggestion (naive perhaps) is the making of a definitive documentary, scientifically robust and endorsed by the major stakeholders to be aired on ABC TV, Radio National and to somehow be accurately delivered through commercial TV.

With that impossible task to ponder, we leave you.

Our apologies for this hurried submission. We trust however that our comments are of value in the few areas that we have had time to address.

Yours faithfully,

Bruce Corcoran - Coordinator

Alan Hopkins - Chairman

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INTEGRATED CATCHMENT MANAGEMENT