



AUSTRALIAN
**Prawn
Farmers**
ASSOCIATION

6th July 2011.

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Project Manager
Greentape Reduction Project
Environmental Policy and Legislation
Department of Environment and Resource Management
GPO Box 2454
Brisbane QLD 4001

RE: Submission to Greentape Reduction Project.

Thank you for the opportunity to make a submission with regard to the Greentape Reduction Project.

The APFA is supportive of any review that aims to reduce the regulatory costs of environmental regulation, while ensuring that environmental standards are upheld.

The aquaculture industry development has stagnated under the current regulatory burden and in some cases retracted. The current licence model imposed on prawn farming is not proportionate to the risk of the activity and the length of time and amount of money spent by one farm in an effort to seek a new development approval exceeded seven years with the Queensland government, not something to be proud of when an investor has funds to invest but has difficulty getting through all the green tape.

The words of this developer should make government agencies cringe -

I read with great interest the news of a Senate Enquiry into Australia's food security. As a sustainable food producer of more than 25 years I feel this is a step in the right direction in identifying how to meet the needs of a growing population, particularly in relation to the protein portion of Australia's growing diet.

Prawn farming in Australia is internationally recognized as having the highest environmental standards of any of the prawn farming nations, with CSIRO having published more than 30 peer reviewed scientific papers on the subject internationally over more than 20 years. In spite of our outstanding credentials not one prawn farm development has made it through the extremely onerous regulatory framework, largely set down by the Federal Governments EPBC act, this has seen not one new development in more than 10 years . This is truly a shameful statistic given that prawn farms tend to use marginal coastal land often not well suited to other forms of agriculture, and the return per unit area (as well as employment) far exceeds any other known form of agriculture with industry average yields of 10 MT/Ha or \$165 000/Ha!

Australian Prawn Farmers Association

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Our own company has been before SEWPAC (formerly before EA and DEWHA also) for 10 years and has still to this day not received a workable license, PRF has completed a number of EIS and done everything asked of it at a cost of more than \$3 million to date without yet turning any soil. This “Guthalungra Aquaculture Project” is set to provide up to 250 jobs in the Bowen shire with an annual production turnover of fish and prawns exceeding 2500/MT/Pa or \$42 million.

We hear every day about Australia’s two speed economy and impending food security issues, yet while, farming tends to be counter cyclical activity that I would have thought has the potential to add some real economic diversity to Australia’s regional economies. The governments of Australia have found the need through the anecdotes of the Asian experience and ideologues of some its employees to stifle the development of our industry by imposing such regulation as “zero net discharge”, a condition imposed on no other industry that we are aware of.

The four broad initiatives aimed at reducing “Greentape”:

- Develop a licence model that is proportionate to the risk of the activity
- Proved flexible operation approvals for ERA’s
- Streamline the process for resource approvals – to significantly reduce the complexity of the current approval system
- Improve the quality of information provided to both business and government

All the above are to be applauded if in fact they work when applied to an actual development approval.

If the above are achieved from this Greentape reduction review what will it mean for aquaculture, prawn farming in particular?

Prawn farmers agree that there is a need to respond to business needs and not to sacrifice environmental standards. Prawn farms have now been established in Australia for more than 25 years and I am not aware of any detrimental environment affect from this activity and I challenge DERM to prove otherwise.

I recently attended a meeting where the discussion focused on an abandoned prawn farm in Townsville being restored by the local council and it was stated “you would never know that there had been a prawn farm there” something that one of our high profile researchers have been preaching for years. CSIRO have undertaken 46 peer reviewed water quality research projects (attached to this email) on the effects of discharge from prawn farming, yet this seems to be overlooked and the industry is treated like a sewerage facility or like an Asian aquaculture facility.

It would be ideal if the first initiative of this Greentape reduction could encompass taking into consideration existing rigorous science that has been undertaken and not ignored.

I attended one of the information sessions and could understand the benefits that would apply for future Statutory rules, Standard approval and site specific assessments however prawn farming would still require environmental impact statements and this sections was not fully explained – that is if there is a new prawn farm development seeking approval what will the benefits be under the new rules?

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Do the new rules, applicable to those who must undertake an EIS, apply equally to agriculture sector as well as mining? Or can one sector simply get high level approvals and ticks simply because of huge amounts of money they will bring to the economy from mining? A resource that is not renewable.

Under the current licence conditions for prawn farming discounts were offered if a farm had ISO accreditation. There was one prawn farm that had ISO accreditation and they duly applied for their discount only to be advised by DERM that their system, one that is extensively audited by high credential auditors had to be audited again by a DERM approved auditor. So a DERM auditor wanted to audit an already audited ISO system.....this farm gave up in disgust and chose to drop its ISO accreditation.

I would also like to bring to the attention of the reviewers the Productivity Commission assessing environmental Regulatory Arrangements for aquaculture 2004 report (attached to this email) and hope that the success of this review will mean a more positive outcome for those wishing to invest in prawn farming in the future.

Yours sincerely

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