



AUSTRALIAN  
**Prawn**  
**Farmers**  
ASSOCIATION

1<sup>st</sup> Septembert 2014.

Att: Alex Dobes  
Aquaculture Review  
Queensland Competition Authority  
GPO Box 2257  
BRISBANE QLD 4001  
[aquaculture@gca.org.au](mailto:aquaculture@gca.org.au)

**Re: Submission to issues paper released 22<sup>nd</sup> July 2014 from Australian Prawn Farmers Association (APFA).**

Dear Alex

Firstly congratulations to all the QCA staff involved in preparation of the issues paper released on 22<sup>nd</sup> July 2014. The issues identified in the paper been very thoroughly investigated, you and other key QCA staff have physically visited actual farms, met with our farmers, farm managers and various board members and this process has given you excellent insight and knowledge on issues that the aquaculture industry have been and are currently facing. Thank you Alex and Angella Nhan in particular.

APFA notes that one of the key challenges for this review was to balance environmental protection with industry development and to suggest a framework that will give prospective investors greater certainty when proceeding with development.

It is a well recognised fact that by 2050 we will need to feed two billion more people and seafood will have a role to play in this. Wild catch fisheries are already operating at maximum sustainable yield and increased demand will need to be sourced from aquaculture activities.

Aquaculture production is immune to drought conditions predicted by increasing climate change and global warming conditions. This combined with better FCR's of producing aquatic animals compared to other animals is well known with fish as low as 1.1 (kg of feed needed to produce one kg of body mass) and cattle as high as 6.8. (National Geographic, June 2014)



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1. APFA applauds the QCA approach of GIS modelling to identify possible suitable aquaculture sites. The example used in the issues paper shows how the overlays can work in the Ayr region. APFA notes that QCA is recommending this work be accelerated and suggests a target of 450 ha of aquaculture operations be developed within two years.

Knowing that the Guthalungra proposal will be 249 hectares, APFA assumes that this 249 ha will not be part of the 450ha.

APFA would like to point out that a summary of research prepared some time ago by CSIRO suggested *“an increase from the current 717 hectares of prawn ponds, producing 2,940 tonnes valued at \$40 million to 5,000 hectares of ponds producing 30,000 tonnes valued at \$400 million – would correspond to less than 1.4% of the existing sugar cane production area. The 5,000 hectares could be located within any of the 594,000 hectares of potentially suitable land between the border of NSW and NT border (a total distance of 13,347km).”*

We would like reference made at this point of the joint JCU, QUT, CSIRO proposal submitted for the Ag North CRC program which the APFA believes would be a comprehensive method of delivering this outcome. The Project is titled “Regulatory reform, spatial planning and enhanced investment to secure quality aquaculture outcomes across Northern Australia”.

APFA also notes that while some governing agencies believe that the Great Sandy Straits development area is an excellent approach – what aquaculture industries, if any, have taken up investment in this particular area?

2. APFA agrees that when identifying suitable aquaculture sites, there is a need for this to be done in conjunction with provision of a more predictable and transparent regulatory approvals process, one that is linked to set time lines for all agencies involved in approval processes, including the Commonwealth.

3. QCA recommends that when implementing the reforms a task force is assembled from relevant agencies to include representatives from local State Government agencies, the Commonwealth and Industry. APFA applauds this approach and does not want to see the excellent work and recommendations outlined by QCA languish in the hands of agencies who don't want to see aquaculture developed in Queensland.



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This recommendation must be linked with number 2 above and APFA likes models done by the South Australian government where an Aquaculture Advisory Committee (AAC) and an Aquaculture Tenure Allocation Board (ATAB) were established to promote aquaculture.

QCA Draft Report Recommendations.

The QCA recommends that the government consider the best structure to ensure the implementation of this review's recommendations.

- Options include a task force consisting of representatives of relevant agencies, or a dedicated administrative unit.

- DAFF has been proposed as the likely candidate for lead agency of a task force, or location for a dedicated administrative unit, however APFA strongly proposes that the lead agency should be Department State Development Infrastructure & Planning as this whole review has been about development of the industry

The QCA stated each of the above options has specific strengths and weaknesses. A dedicated aquaculture unit led by Department State Development Infrastructure & Planning is likely to develop a better long term work program extending beyond the action of the first milestone in aquaculture development areas. This is more likely to benefit the long term development of the aquaculture sector in Queensland. On the other hand, a task force is more likely to ensure that the immediate work program is achieved with minimal resources. That can be redeployed once the aims of regulatory reform have been achieved.

There is a strong case for the APFA to make for the establishment of both a task force or better still an aquaculture industry based advisory board to oversight the work and progress of a dedicated aquaculture unit.

Senior State Development and DEHP officers along with the DG of DAFF should be appointed to the advisory board, as well as a qualified legal practitioner.

APFA would regard this tandem combination as a win, win for industry.

The APFA does not envisage an Advisory Board becoming a permanent fixture. Initial arrangements for establishing such a body should include a 'sunset clause' of say three years for winding it up. The Board should meet twice yearly or on request from the dedicated aquaculture unit on a needs basis.



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AFPA is in agreement with the QCA's contention that "a task force is more likely to ensure that the immediate work program (for a dedicated aquaculture unit) is achieved with minimal resources".

Allowing industry representatives an oversight and advisory role would go a long way to helping ensure benchmarked targets set for the aquaculture unit would be met on time and problems that might arise could be discussed with industry direct and overcome.

Working in concert would send a clear signal that both industry and the government are committed to revitalising and developing the aquaculture sector in Queensland.

4. Single Aquaculture Act – while APFA notes that QCA is confident *"that better coordination if administration and clarity on key regulatory requirements will address the underlying concerns which have promoted calls for a single Act."* APFA would like it noted that despite assurances from Ministers going as far back as Henry Palaszczuk, that an Aquaculture Act could be developed, there appears to be a distinct lack of will to make this happen.

5. APFA and its members are disturbed by "offsets" creeping into documents and material relevant to aquaculture. Prawn farms practice environmental offsets on a daily basis.

Most farms have set aside approximately 30% of productive farm area as settlement systems, science undertaken when farms were initially developed in Australia suggested that this was the best method of mitigation, capturing nutrients and allowing them to settle prior to discharge of water.

Locking up 30% of potentially productive land for settlement calculates to a value of approximately \$3 million per annum that is wasted by farms which actively practice best management, sustainability and offsetting.

Whilst the concept of the Reef Trust as a mechanism for delivering offsets would be the preferred method, the APFA would like to reinforce that this should be done across all new industries that contribute to nutrient loads in the GBR. If this is done equitably across all new developments then the likely costs involved will be more viable.

The APFA also strongly supports the comment that the Queensland government must provide potential proponents with the maximum possible certainty about the future price and availability of offsets.



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6. APFA notes that the QCA has suggested that Torres Strait and Gulf of Carpentaria could be prospective areas for future development. APFA disregards this entirely for prawn farming. Although we do note that indigenous aquaculture could flourish in these regions, mainstream activities such as prawn farming would lack access to labour, reliable power source and infrastructure such as transport required to get product to market in a cost effective manner.

Given APFA farms advances in husbandry and water treatment, now exceeding other worlds best practice by a considerable margin, farms with minimal or no impact are fully appropriate within the GBR coastal region. The statement on page 31 of the report “APFA added that a one stop shop will only work if new developments are not situated close to the GBR” is incorrect and we would like that deleted.

Perhaps if the Ag North CRC development proposal is established this could address some of the issues involved in developing these remote areas for mainstream business.

7. APFA notes that the issues paper does not clearly address how the aquaculture industry should engage with the Commonwealth agency – GBRMPA. We note that this agency believes there is significant latent effort with unutilised existing licences. As noted in the QCA report, the statements made by GBRMPA in this regard were inaccurate and exaggerated. We welcome clarification of these figures by DAFF.

APFA also notes that *“the Commonwealth and Queensland governments are committed to delivering a ‘one stop shop’ for environment approvals”*. We welcome this, however we also strongly affirm that this must be done comprehensively and in a manner that is viable for industry development.

APFA also notes with disdain that other stakeholders – including recent agricultural activities in the Ayr/Bowen region did not require approvals from GBRMPA (p35 of document)

The size of the two developments exceeded 1000ha, they were not required to purchase offsets, approvals were done in less than a year and the EPBC Act was not triggered.

This is despite GBRMPA reports that state agriculture runoff directly impacts the health of the GBR and contributes to nitrogen and pesticide loads in the reef lagoon.



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This reinforces APFA opinion that aquaculture is being singled out for harsh regulatory treatment simply because we have a point source of discharge, while agriculture runoff is 'diffuse source pollution' which is more difficult to predict and monitor. (p36 of document)

APFA would like to see a simple summary of the current contributors of nutrient loads to the GBRMP in the QCA report. It is important that current nutrient loads from aquaculture are put into perspective compared to other major contributors. This information is available from various reports, however a neat table comparing these figures would be very valuable in clarifying the current situation.

APFA also requests that when GIS mapping is done and zones or regions identified as possible suitable areas the assimilative capacity of the area, if within GBR zones, needs to be taken into account. As an emerging industry aquaculture will need financial assistance to get this undertaken.

APFA are currently scoping a Stewardship Action Plan and part of this process will be to engage with key stakeholders throughout the project. We would like it to be noted in the QCA report that this is being done to help facilitate reform for our industry and as a management tool to assist with moving the regulatory impasse forward.

Yours sincerely

Helen Jenkins  
Executive Officer.

## Australian prawn farming: how we fit into the big picture

	TSS (tonnes)	TN (tonnes)	TP (tonnes)
<b>2010/11 Total Loads (all catchments in GBRMP)</b>	20 000 000	100 000	32 000
<b>Approximate from prawn farms (currently in production in GBRMP)</b>	425	42.5	4.3
<b>% from prawn farms</b>	0.002%	0.043%	0.013%

Source:

Great Barrier Reef Catchment loads monitoring 2010-2011

## Australian prawn farming vs grazing and sugarcane

	Grazing	Cane	Prawn farming (best practice currently)	Prawn farming (MBD results)
<b>TN annual load kg/ha</b>	10.9	9.3	100	35
<b>TP annual load kg/ha</b>	2.2	1.6	10	8.5
<b>Return per ha</b>	\$150	\$4,325	\$220,000	\$220,000
<b>Return per kg N</b>	\$14	\$465	\$2,200	<b>\$6,286</b>
<b>Return per kg P</b>	\$68	\$2,703	\$22,000	<b>\$25,882</b>
<b>N return % improvement (vs cane)</b>			473%	<b>1352%</b>
<b>N return % improvement (vs grazing)</b>			15987%	<b>45676%</b>

Sources:

Paddock to Reef Model (DNRM 2014)

Technical report Future Farm Industries CRC 2010

MBD Status report: bioremediation demonstration trial 2014

Australian Sugarcane: Industry in Figures, 2009