



## **PUBLIC CONSULTATION – STATUTORY REVIEW OF THE REGULATED STANDARDS – REEF PROTECTION REGULATIONS**

### **AUSTRALIAN SUGAR MANUFACTURERS SUBMISSION 1 JULY 2025**

#### **1. About Australian Sugar Manufacturers**

Australian Sugar Manufacturers (ASM) is the peak industry body representing the nation's sugar manufacturing sector, contributing \$4.4 billion annually to the Australian economy and supporting more than 20,000 jobs in regional communities. ASM works closely with its members, industry stakeholders, and government to develop and advocate for policies that enhance the sustainability, competitiveness, and long-term economic contribution of the sugar manufacturing sector. From the production of raw sugar, bio-based manufacturing and generation of renewable energy, the sugar manufacturing sector continues to support communities, create jobs, and foster a sustainable future for the industry, and the broader economy.

#### **2. Introduction**

The agricultural Environmentally Relevant Activities (ERA) standards (regulated standards) are part of the Reef protection regulations. The regulated standards apply to commercial sugarcane and banana cultivation and beef cattle grazing in the Great Barrier Reef catchment. The standards require producers to adopt practices that minimise nutrient and sediment run-off flowing to local waterways and the Great Barrier Reef. Under the Environmental Protection Act 1994, the regulated standards, which were made in 2019, must be reviewed every five years. This review is considering whether the regulated standards (and supporting materials) are easy to understand and clear to comply with and remain fit-for-purpose and evidence-based.

#### **3. Summary of recommendations**

- a. Reduce technical and terminological complexity
- b. Reduce dependency on prescribed methodologies and external guidelines
- c. Amend the significant administrative and record-keeping burden
- d. Remove uncertainty around verification and accreditation of growers



#### 4. ASM position

The ASM has always advocated for an industry-led framework for sustainable production and management of natural resources in Queensland. Such a framework must be fit-for-purpose and evidence-based.

While the Agricultural ERA Standard for sugarcane cultivation is grounded in environmental objectives, several aspects of the regulation, particularly its technical language, layered compliance steps, reliance on external methodologies, and significant record-keeping demands, are likely to pose challenges for growers. These complexities increase the risk of unintentional non-compliance, particularly for operators without ready access to agronomic expertise or digital record systems. To support effective implementation and improve compliance outcomes, additional clarity, simplification, and support tools may be necessary, particularly for smaller or less-resourced growers. This could be solved by providing annotated guidance or simplified language.

*Recommendation: Reduce technical and terminological complexity*

The regulatory framework frequently relies on technical terminology such as ‘whole of farm phosphorus amount’, ‘whole of farm nitrogen amount’, ‘district yield potential’, and ‘appropriate person’, all of which presuppose a level of specialised agronomic knowledge. In particular, the concept of ‘district yield potential’ is not self-explanatory and is defined only with reference to a separate Prescribed Methodology. This external dependency introduces complexity and limits accessibility for growers who are not already familiar with such documents or who lack ready access to agronomic consultants. ASM submits that key figures and calculations be embedded in the standard.

*Recommendation: Reduce dependency on prescribed methodologies and external guidelines*

A significant number of conditions within the sugarcane ERA standard, particularly those relating to soil testing, nutrient calculations, and fertiliser application (SC6 to SC8 and SC13 to SC19), rely heavily on the use of an external document known as the *Prescribed Methodology for Sugarcane Cultivation*. This reliance introduces an added layer of complexity for growers, who must navigate between multiple documents to understand and fulfil their regulatory obligations. Importantly, this prescribed methodology is not included within the standard itself but must be accessed separately via a government website.

While the standard references this methodology through hyperlinks, no assurance is provided that the linked content will remain stable over time. If the linked material is moved, updated without notice, or becomes inconsistent with the standard, growers may unknowingly act on outdated information. This dependence on evolving external content without integrated version control or notification requirements undermines the clarity and self-contained nature of the regulatory instrument. It may ultimately affect the standard’s fitness for purpose by creating uncertainty around what constitutes compliant practice.



*Recommendation: Amend the significant administrative and record-keeping burden*

The record-keeping obligations set out in the sugarcane ERA standard, particularly under conditions SC20 to SC25 and Appendices 1 through 3, are extensive and administratively burdensome. Growers are required to document a wide array of information, including detailed records of fertiliser types, application rates, and nutrient composition, comprehensive farm maps with block-level zoning and yield history, and verification records for annual and five-year nutrient budget reviews.

While these requirements aim to ensure transparency and accountability, they are time-consuming and may be difficult to manage. For many, meeting these documentation obligations requires either a significant investment of time or reliance on external support, both of which may impact the practicality and accessibility of the standard. Without streamlined tools or simplified alternatives, the scale of these obligations risks undermines the standard's usability and uptake.

*Recommendation: Remove uncertainty around verification and accreditation of growers*

The standard permits growers to act as an 'appropriate person' for the purposes of developing and verifying a Farm Nitrogen and Phosphorus Budget, provided they are accredited under a 'recognised accreditation program' (as defined in Appendix 4). However, the standard does not specify which programs are recognised, nor does it outline the accreditation process, required competencies, or oversight mechanisms. This lack of clarity may lead to confusion among growers about whether they meet the threshold to self-certify and could result in inconsistent application of the standard across the industry. For the regulation to be applied fairly and effectively, greater transparency around accreditation pathways and program recognition is essential. ASM submits that a clear list of recognised programs and pathways be included in the standard.

To discuss this submission further, please contact Dr Christopher Wren, Head of Advocacy, Policy and Strategic Communications, at [c.wren@sugarmanufacturers.org](mailto:c.wren@sugarmanufacturers.org) or on 0493 592 577.

Yours sincerely

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