



North Australia Carbon Services Pty Ltd.
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25 September 2024

Office of the Great Barrier Reef and World Heritage
Queensland Department of Environment, Science and Innovation
GPO Box 2454
Brisbane QLD 4001

By Email: OfficeoftheGBR@des.qld.gov.au

Dear Departmental Officer

Re: The Reef 2050 Water Quality Improvement Plan (Reef 2050 WQIP)

This letter confirms North Australia Carbon Services Pty Ltd support for Agforce submission to the Reef 2050 Water Quality Improvement Plan (Reef 2050 WQIP). I have made contributions to the Agforce submission and we provide this letter as support.

North Australia Carbon Services is a collaborative company, set up for united collaboration on projects, particularly around soil carbon and pongamia; soil health, agronomy, biofuels and bioenergy crops. It is named 'carbon' as carbon is the building block of life. Carbon is the biggest single indicator of soil health. Plants build carbon, cattle eat carbon. This is a multi-skilled board. Our 'core' business is:-

1. R, D & E (research, development and Extension/Adoption) around soils, plants, grazing land management (which incorporates Beef cattle methodology);
2. New, emerging & traditional tropical and sub-tropical biofuel/bioenergy crops (i.e. Pongamia, Sunn Hemp, Bana grass, Forage sorghums, Sugarcane – but not limited to...);
3. Carbon projects – advisory, planning, development, registering, and soon baselining;
4. Land suitability, land searches, Due Diligence on land;
5. Land negotiations/dealings (we have connection to Agent/s and have a Traditional Owner, experienced in Land dealings in our board of directors. Mr. Yeatman has a profound understanding of the intricate dynamics of Aboriginal and Torres Strait Islander values, lore, and kinship systems. He has ancestral ties that span north through the clan groups of Cape York Peninsula (Kunjen Olkol, Kuku Thaypan, and Eastern Kuku Yalanji – Kuku Nyungkul) and extend southward.
6. Land rehabilitation; and
7. Any other matter not limited to above relating to carbon (soils, agronomy, carbon, cattle/pastures and biofuels knowledge).



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A team of highly qualified colleagues, with complementary skills. With carbon projects, in particular, we set clients up to be proponents of their own carbon projects and assist landholders become carbon neutral enterprises, achieve certification or market advantage. We provide complete package carbon farming services including Technical method support, Project Design, Project Feasibility Assessment, Mapping and Stratification, Field Sampling and Carbon Assessment Project Offset Reporting. Advisory on farm emissions reduction options so landholders can work towards supply chain, industry, or farmer-specific goals. We are looking to carbon Project Registration with Clean Energy Regulator, Land Management Strategies (LMS) for carbon sequestration and specialization in Grazing lands, multi-species and cover crops and Pongamia.

With the Agforce submission, in particular, with the key points made, we support:-

- 1. Human-induced climate change is the primary threat to the Great Barrier Reef and poor water quality can exacerbate climate-related impact:** This is acknowledged in the 2022 Scientific Consensus Statement. It is essential that the WQIP recognises that climate change can itself change water quality outcomes by increasing temperatures and changing rainfall patterns that can affect nutrient runoff and soil erosion, eutrophication, and the release of nutrients from sediments into the water column.
- 2. Scientific evidence is a fundamental basis on which to build sound policy.** Good science starts with a null hypothesis and is either proven or disproven – but all outcomes contribute to a ‘pool of science’ (often ruling out causal effects). Monitoring, modelling and reporting programs that inform water quality could be strengthened and refined by increasing their spatial and temporal coverage to capture regional and local differences and provide more balanced coverage across land uses and ecosystems. For instance, what is the baseload of sediment that comes out of Wet Tropics rainforests, that do not have grass cover, following large Tropical Cyclone events and rain depressions. Pongamia Australia Ltd would welcome a more thorough approach and hopes it will lead to fewer assumptions about the role of agriculture as the driver of poor water quality. Policy decisions must be based on empirical evidence rather than modelling.
- 3. Recognition of existing best practices:** Many agricultural producers are already implementing best practices that contribute to water quality improvement. Departmental staff liaising with primary producers are encouraged to consider that they are addressing highly capable operators of complex agroecological systems. Also new best management practice and farming systems, developed by industry. For instance, cover cropping, integrated tree/pasture cropping and tree/cropping Agro-silviculture operations.



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4. **Genuine and balanced stakeholder engagement:** Our members have a long history of engagement with DESI and there is a sense of disillusionment based on past failures of the department to genuinely respond to feedback provided.
5. **Fair and Effective Compliance:** Compliance measures need to be fair, non-punitive, and only used as a last resort after careful consideration and clear communication. Our experience has, unfortunately, all too often been that heavy handed officers enact stressful and sometimes devastating measures with insufficient understanding of primary production, and without compassion for complexities and mitigating circumstances. There is great value in the Department's compliance teams developing strong industry-based partnership or advisory arrangements within the key GBR catchments, enabling more targeted and effective compliance effort.
6. **Role of third-party facilitation:** Frustration builds in response to mounting communication failures. When done correctly using trusted agents – to be identified through AgForce – utilising third-party facilitation can improve the relationship between government and industry and enable continuous improvement at the GBR-scale.
7. **Catchment based approaches and impact of other land use types:** The preoccupation with agricultural land users is not only unfair but is ultimately unlikely to improve water quality: There are multiple land use types in GBR catchment areas, with poorly understood impacts. We continue to ask that areas not under agricultural land management get equal focus – including national and state government managed areas.
8. **Legislative conflicts:** Conflicts between different pieces of legislation need to be resolved to provide clear and achievable guidelines for Industry, both new investors within the biofuel sector and producers alike. This is particularly relevant in the context of vegetation management, reef regulations, water availability and biosecurity. It is of deep concern that vegetation mapping, despite advances in AI and machine learning, have not translated to better differentiation between vegetation types, especially woody weeds.
9. **Role of vegetation management for quality groundcover:** We firmly believe that it is groundcover, not tree-cover – whether that be through deep-rooted perennial grasses and legumes, or crop cover, stubble or trash blanketing, that allows for maximum infiltration following large rainfall events, and minimises runoff – through root channels etc. Controlling regrowth and weeds is key to improving beneficial forage and ground cover, with both production, biodiversity and water quality benefits. There is considerable scope for scientific, evidence-based approaches to improving vegetation policy, rather than the simplified ideological stance that creates an unscientific bias towards high density tree cover.



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The State Government is welcome to contact our organisation to discuss further opportunities to seek improved environmental and industry outcomes through our services, as outlined above.

Yours Sincerely,

Signature:

Name	Peter Russell Spies
Position title	Director, Chair. North Australia Carbon Services Pty Ltd.
Date	25 September 2024