



RICEGROWERS' ASSOCIATION
OF AUSTRALIA INC

SUBMISSION TO THE NSW GOVERNMENT CLEAN AIR POLICY

January 2017

1. INTRODUCTION

The Ricegrowers' Association of Australia (RGA) welcomes the opportunity to participate in the Clean Air for NSW Review.

This submission is in response to the Clean Air for NSW Consultation Paper issued by the NSW EPA.

2. THE RICEGROWERS' ASSOCIATION OF AUSTRALIA

The RGA is the collective voice of rice growers in Australia. The RGA represents the interests of around 1200 voluntary members. The main objective of the RGA is to provide members with strong and effective representation on issues affecting the viability of their businesses, their communities and their industry.

The RGA is made up of eight branches located across the Riverina rice growing regions of NSW. Each branch annually elects representatives to form the RGA Central Executive. The Central Executive represents their respective branches in determining RGA policy and projects.

The RGA is a member of the National Farmers Federation, National Irrigators Council and NSW Irrigators Council.

3. THE RGA'S POSITION

The RGA in general supports the Goals and Actions described in the Clean Air for NSW Consultation Paper.

The RGA however wishes to provide specific comment regarding the section of the paper titled ***“Reducing health impacts of hazard reduction burning and other open burning”***. In particular, the RGA provides the following:

GOAL: Improved health outcomes and reduction in all health impacts of smoke across populations by reducing exposure to particle pollution from hazard reduction and open burning in metropolitan and regional NSW

The RGA is very keen to work with the Office of Environment and Heritage in relation to this goal.

While the RGA fully supports the Goal and Actions described in this section, the rice industry needs to ensure that it maintains its right to burn stubble as a tool of last resort. Unfortunately due the high yields of Riverina rice crops, a massive stubble load remains after harvest in the order of 12-15 ton per hectare. This means that the next crop to be planted requires some form of stubble removal.

While the industry is constantly evaluating new and innovative stubble management practices, seasonal conditions and crop planting windows often mean that current alternative practices are not suitable and hence the rice stubble must be burnt.

In order to reduce the community impacts of stubble burning, and to encourage sensible burning practices, the RGA has developed an effective best management guide to stubble burning based on understanding the weather conditions (time of day, risk of inversion and wind direction).

ACTION 3: expanding the scope and enhancing the accuracy of air quality forecasting capabilities in New South Wales over the next five years by the OEH Air Quality Forecasting Program, through collaboration and the development of advanced tools and analysis.

ACTION 4: fully utilising Rural Fire Service smoke plume modelling to forecast the impact of hazard reduction burns or bushfires on communities

ACTION 5: improving communication and awareness of air quality and health impacts from smoke and fine particle pollution across government, the private sector and the community

Through the RGA's extension partners Rice Extension and the Environmental Champions Program the RGA delivers information regarding environmental best management practice to rice growers. As extension material regarding minimising air pollution is a key component the RGA will be able to communicate the outputs from Actions 3, 4 and 5 through these programs.

ACTION 6: promoting conservation farming to reduce impacts of agricultural burning

ACTION 7: increasing community understanding of appropriate meteorological conditions for hazard reduction and agricultural burning that is provided by the Bureau of Meteorology and improved pollution forecasting.

Through the rice industry's extension of innovative stubble management practices the RGA will be able to promote appropriate conservation farming practices as described in Action 6.

In relation to Action 7 the ongoing implementation of our best management practice for rice stubble burning (as a tool of last resort) would be enhanced if during the peak periods of rice stubble burning the Bureau of Meteorology delivered daily regional weather forecasts specifically highlighting the conditions for that day to burn.

4. CONCLUSION

The RGA supports the Goals and Actions described in the discussion paper, however the rice industry needs to ensure that it maintains its right to burn stubble as a tool of **last** resort to maximise the productivity of rice farming systems in the Riverina.

The RGA thanks the NSW EPA for the opportunity to submit to the Clean Air for NSW Review.

5. CONTACTS

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