

Submission on Changes to Vegetation Management Laws Queensland

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Scott Harris

Strathmore Station

29th April 2016



Submission on Changes to Vegetation Management Laws Queensland

In this submission

VMA	Vegetation Management Act 1999
SPA	Sustainable Planning Act 2009
LSA	Legislative Standards Act 1992
DNRM	Department Natural Resources and Mines
DILGP	Department Infrastructure Local Government and Planning
SARA	State Assessment and Referral Agency
SDAP	State Development Assessment Provisions

Vegetation Management (Reinstatement) and Other Legislation Amendment Bill 2016 (“The Bill”)

Summary

The Bill states its policy objectives are to:

- reinstate a responsible vegetation management framework to more effectively manage vegetation clearing in Queensland thereby reducing clearing rates and consequential carbon emissions.
- guard against excessive clearing of riparian vegetation especially in the Great Barrier Reef catchments.
- reinstate a riverine protection framework for destruction of vegetation in a watercourse, lake or spring.
- reinstate Environmental offsets to ensure adequate conservation outcomes.

The Bill will

- remove high value agriculture and irrigated high value agriculture as a relevant purpose under the VMA and making it a prohibited development under SPA bringing to an end native vegetation clearing for high value agriculture in Queensland.
- retrospectively take away an applicant’s right to have their application determined if it was lodged prior to the 17th March 2016, but not properly made.
- take away the fundamental principle that a person is innocent until proven guilty by reversing the onus of proof.
- take away a long established and fundamental defence to a charge of reasonable and honest mistake of fact.

Note: Environmental offsets, Riparian protection and high value regrowth do not form part of this submission.

Submission One

- **The Bill will be a major impediment to the development of the beef and grain industry in Queensland and damage the Queensland economy.**
- **The State Government has made it currently impossible to make application and obtain approval for clearing of native vegetation by changing the codes and policy even without the Bill passing through Parliament.**
- **There is no need to amend the current laws, policies and codes in respect the clearing of native vegetation for high value agriculture and irrigated high value agriculture as they have been very effective administratively, environmentally, economically and practically.**
- **The information supplied in support of applications under existing legislation could be presented with greater Department collaboration and support to improve integrity and effectiveness of existing process.**

Comments

With the downturn in the resources sector agriculture will emerge as a backbone industry vital to the Queensland economy for decades to come.

The demand for agricultural products worldwide and in particular in the Asia region is increasing exponentially and by 1950 it is predicted consumption will rise by:

○ China	Beef	236%	Grain	52%
○ India	Beef	95%	Grain	50%
○ Indonesia	Beef	1319%	Grain	100%

Regional emerging market economies will continue to grow almost three times faster than developed ones, accounting for an average of 65 per cent of global economic growth through 2020. (IMF Data base 2014)

For Australia to compete in a world market and meet this demand we must dramatically increase production and productivity in all agricultural sectors.

To become and remain competitive we must also be able to produce agricultural products with efficiency and scale. For example we can no longer produce beef to specification using traditional broadacre grazing. With supplementation from cropping we can produce quality weight for age beef in the north that is competitive in the world market.

Within the constraints imposed by our wage system there are 4 major components vital to the growth of the agricultural industry in Queensland.

- Water security
- Ability to develop land
- Secure tenure
- Infrastructure

Water security will be achieved with less reliance on ground water and advances in retention of stream and overland flows.

With the incursion of woody regrowth onto prime agricultural land it is important that not only is the current level of land available for agriculture maintained, sustainable clearing of native vegetation must be supported into the future. The encroachment of woody vegetation and the inability to develop arable land in the future for high value agriculture will severely impede agriculture in Queensland.

Queensland is 65% leasehold (30 year term leases). Security of tenure is vital to support the level of investment required in agriculture on the scale necessary to meet and sustain world demand for agricultural products. Large scale investment cannot be supported by short term leases and successive Governments have failed to address tenure security.

To remain competitive producers and industry require necessary infrastructure such as roads, ports, railways and power.

The Federal Government Developing the North policy has provided a dedicated Minister and funding and represents a huge opportunity for the development of North Queensland provided these challenges are addressed at a State level.

Pre 17th March 2016 approvals or clearing native vegetation

The clearing of native vegetation in Queensland is regulated by the VMA and SPA and associated policies and codes which were amended in 2104 to allow for clearing of native vegetation for high value agriculture and for irrigated high value agriculture.

The application process involves

- 1) Obtain a report of the vegetation mapping.

The report will enable an applicant to determine:

- if vegetation can be cleared under an exemption.
- what self-assessable code might apply.
- if clearing may be undertaken under an area management plan.
- if a development approval is necessary.

- 2) Make an application to SARA

As part of the application process it is necessary to demonstrate in a development plan that:

- the land is suitable for the proposed high-value or irrigated high-value agriculture.
Land suitability report by a Suitably Qualified Person
- the development will be economically viable.
Economic viability report by a Suitably Qualified Person
- there is no suitable alternative site and clearing is limited to the extent necessary to establish and cultivate crops.

In doing so it is necessary to consider:

- the guidelines to clear high value or irrigated high value agriculture V2.0 27 July 2015
- A pre-lodgement meeting

- An assessment against SDAP Module 8: Clearing Native Vegetation

3) Obtain DNRM s22A approval

- Obtain approval from the Chief Executive DNRM that the clearing is for a relevant purpose and therefore not prohibited pursuant to VMA s22A
- Complete a development approval template
- DNRM may provide written confirmation that the proposed clearing is for high-value or irrigated high-value agriculture.
- If approval is not obtained the application can go no further as it is prohibited.

4) Application properly made

When the S22A approval is obtained the application is deemed properly made and SARA then:

- Issues notices to native title parties pursuant to NTA
- Assesses the application against the SDAP and issues a decision notice approving or refusing the application.

5) The approval

- The development approval for operational works will set out the conditions of the approval, provide essential mapping and co-ordinates necessary to complete the works
- The works must be substantially commenced within 2 years of the decision notice.

State Development Assessment Provisions SDAP

The SDAP are codes containing performance criteria and acceptable outcomes against which a properly made application is assessed by SARA.

Module 8 relates specifically to native vegetation clearing and Tables 8.1.1, 8.1.2, 8.1.3 and 8.1.6 apply.

This process does away with assessment managers and concurrence agencies and provides SARA with considerable flexibility in the codes and performance standards so as provide a smooth pathway to approval once an application is properly made.

Since July 2015 there have been some significant amendments to the SDAP and the approval process by the current Government.

These amendments are described in Appendix 1 and the most relevant changes are set out below.

In summary

1) SDAP Version 1.5 Module 8 Table 8.1.6 PO1

Vegetation Management Act s22 DAB (2) (c)	SDAP Version 1.5 Module 8. Table 8.1.6 PO1.
<p>(c) The land is suitable for agriculture having regard to topography, climate and soil attributes; and</p> <p><i>Example of a soil attribute— the sodicity and salinity of the soil</i></p> <p>there is no suitable alternative site on the land for the clearing;</p> <p>(d) details of a business plan, for activities related to the clearing, showing information about the viability of the activities;</p> <p>(e) if the clearing involves irrigated high value agriculture clearing, evidence that the owner of the land is an eligible owner who has, or may have, access to enough water for establishing, cultivating and harvesting the crops to which the clearing relates</p> <p>(f) evidence that the clearing will comply with all the restrictions prescribed under a regulation and relevant to the clearing</p>	<p>Clearing is only for high value agriculture clearing or irrigated high value agriculture clearing where:</p> <p>1) the land is suitable for agriculture having regard to topography, climate and soil attributes.</p> <p>2) there is no alternative site on the land for the clearing.</p> <p>3) a business plan, for activities related to the clearing, demonstrates the viability of the activities.</p> <p>4) where the regulation prescribes restriction relevant to the clearing those restrictions are complied with.</p> <p>5) if for irrigated high value agriculture clearing, demonstrate that the owner who has ,or may have access to enough water for the establishing cultivation and harvesting the crops to which the clearing relates .</p>

The acceptable outcome for PO1 in SDAP 1.5 was

AO1.1 The chief executive administering the VMA is satisfied the clearing meets the requirements of VMA section 22A for high value agriculture clearing or irrigated high value agriculture as evidenced through written confirmation from the chief executive OR

AO1.2 Demonstrate that the clearing is for high value agriculture clearing or irrigated high value clearing

Editors Note: This can be demonstrated through preparing a development plan in accordance with the Guidelines for determining high value and irrigated high value agriculture DNRM

The effect of this Acceptable Outcome is that upon the Chief executive of DNRM giving the s22A approval and the application is properly made the PO1 is satisfied. This placed the bulk of the assessment process on DNRM (as it should be given the expertise DNRM has in the land management arena)

It is important to understand that SDAP 1.5 Module 8 Table 8.1.6 PO 1 mirrored the legislative requirements of section 22DAB VMA in that matters the Chief Executive had to consider were identical to the SDAP.

SDAP Version 1.6 was introduced on 6th July 2016 amending version 1.5

The effect of the amendment was to remove the section 22A approval as an acceptable outcome for PO1

This meant SARA could consider matters in respect of the performance outcomes other than the s22A approval from DNRM considerable watering down the role of DNRM in the assessment process.

2) SDAP Version 1.5 Module 8 Table 8.1.6 PO3 Watercourses

PO3 relates to ensuring riparian vegetation is maintained along watercourses to prevent erosion and sediment and relevant distances were established

A Watercourse is defined in the *Water Act 2000 - SECT 5*

(1) A watercourse is a river, creek or other stream, including a stream in the form of an anabranch or a tributary, in which water flows permanently or intermittently, regardless of the frequency of flow events—

(a) in a natural channel, whether artificially modified or not; or

(b) in an artificial channel that has changed the course of the stream.

(2) A watercourse includes any of the following located in it—

(a) in-stream islands;

(b) benches;

(c) bars.

*(3) However, a watercourse **does not include a drainage feature.***

A watercourse map can be obtained from DNRM.

The effect of using the definition of a watercourse was to provide the landholder with some certainty that he could clear vegetation provided he left a buffer around defined watercourses as might be required in the Development Approval.

SDAP Version 1.7 was introduced on 23rd November 2015 amending version 1.5

PO3 was amended to include drainage feature.

Drainage feature is defined in the *Water Act 2000 definitions* as

A natural landscape feature including a gully drain drainage depression or other erosion feature.

It is impracticable if not impossible to map drainage features on any scale and DNRM do not have maps.

A photo of a watercourse which could not be captured by the definition was redefined as a drainage feature by DNRM. (Appendix 2)

The effect of this amendment will make it virtually impossible to obtain an approval to clear anything but the flattest country that has no drainage features as a buffer of up to 100 metres each side of any drainage feature will be required.

3) SDAP Version 1.5 Module 8 table 8.1.6 PO5 Soil Erosion

PO5 relates to potential soil erosion and was intended to avoid land degradation

Under Version 1.5 the land clearing could not result in soil erosion and an acceptable outcome if there was any potential for soil erosion was a sediment and erosion control plan. This process was certain and where erosion might occur is an exact science.

SDAP Version was introduced on the 8th April 2016 amending Version 1.5

PO5 was amended to say the proposed clearing could not accelerate soil erosion and that the sediment and erosion control plan must control measures to ensure rates of soil loss and sediment movement are the same or less than those prior the proposed development.

The rules are very well established about slopes, soils types and landforms where clearing can be safely undertaken without the risk of erosion. Whilst this amendment may not appear onerous it has taken an objective process and made it subjective. It is impossible to supply a plan in advance of the works that can guarantee an outcome and it requires monitoring which are added and unnecessary expenses.

Interim steps to prevent clearing from February 2015 to 17th March 2016.

Since early 2014 there has however been co-ordinated approach at the direction of the Government to deny, prevent or slow down landholders in the exercise of otherwise lawful rights to make application for and undertake native vegetation clearing for high value and irrigated high value agriculture.

On 12th December 2015 various environmental lobby groups wrote to the Deputy Premier urging the Government to act to prevent any further approvals for the clearing of native vegetation. (Appendix 3)

From that date both DNRM and DILGP took direct action to frustrate applications.

These actions included:

- 1) SARA refusing to accept an application as a valid application until such time as a section 22A VMA approval is obtained from the Chief Executive DNRM. This is clearly contrary to the provisions of SPA.
- 2) DNRM delaying the S22A approval process by

- employing outside experts to assist with information request to put the applicant creating inordinate time delays and expense
 - not accepting previously Suitable Qualified Persons to provide land suitability and economic viability reports.
 - changing the accreditation for soil reporting so as to exclude previously suitable scientists
- 3) enlisting the support of the State Department of Environment and Heritage Protection and the Federal Department of Environment to execute warrants undertake inspections and prepare reports where there has either been no native vegetation cleared or no environmental laws breached.
 - 4) Amending the SDAPs to frustrate existing applications or pending applications so that there are now no acceptable outcomes for critical performance criteria.

Note: Notwithstanding that there has been no change to the Vegetation Management Act or the Sustainable Planning Act and that the proposed Vegetation Management laws have not been passed or taken effect it is impossible to apply for and obtain a development approval in for the clearing of native vegetation for high value agriculture and irrigated high value agriculture in Queensland today

Environmental Considerations

There has been a lot said in the media and by politicians about carbon emissions, damage to the Great Barrier Reef global warming and destruction of rare and threatened species.

These comments are big on emotion and hype but lacking in any substance.

Despite several thorough investigations by the State and Federal Environment Departments I am not aware of any matters of environmental significance which were impacted upon by tree clearing.

Any application is assessed pursuant to SDAP Module 8. 8.1.1 which states

8.1.1 Purpose The purpose of the code is to regulate the clearing of native vegetation within Queensland to:

- (1) conserve remnant vegetation that is—
 - (a) an endangered regional ecosystem
 - (b) an of concern regional ecosystem
 - (c) a least concern regional ecosystem
- (2) conserve vegetation in declared areas
- (3) ensure clearing does not cause land degradation
- (4) prevent loss of biodiversity
- (5) maintain ecological processes
- (6) manage environmental effects of the clearing to achieve (1) through (5) (7) reduce greenhouse gas emissions
- (8) allow for sustainable land use.

The Land suitability report prepared by a suitable qualified person must address with rigour all the matters set out in Table 8.1.6 as performance criteria including wetlands, watercourse, connectivity soil erosion salinity conserving endangered and of concern regional ecosystems and essential habitat acid sulphate soils and must provide acceptable solution.

Submission Two

- **The Bill will take away the defence to a charge of reasonable and honest mistake of fact.**
- **The Bill will take away the fundamental principle that a person is innocent until proven guilty by reversing the onus of proof.**
- **The Bill contravenes the Legislative Standards Act 1992**
- **There has been little or no consultation, in particular with landholders**

Comments

Mistake of fact

Under the current law if a landholder clears native vegetation with or without an approval and he does so under an honest but mistaken belief as to the existence of certain facts which turn out not to be the case then he can plead a defence to the charge of unlawful tree clearing on the basis of that mistake. It is not a complete defence as the Court will look at all the circumstance however it remains a well established legal defence.

The Bill will remove this fundamental and basic legal right from the existing legislation which will put the Bill at odds with the Criminal Code affording greater rights to criminals than landholders.

The Criminal Code 1899 - SECT 24 provides

(1) A person who does or omits to do an act under an honest and reasonable, but mistaken, belief in the existence of any state of things is not criminally responsible for the act or omission to any greater extent than if the real state of things had been such as the person believed to exist.

(2) The operation of this rule may be excluded by the express or implied provisions of the law relating to the subject

The States reasons are that the defence

- involves the state of mind of the mistaken person and is hard to disprove
- if taken away might be a deterrent to a landholder
- isn't necessary as the landholder can get all the information he needs from DNRM so he cannot make a mistake

In my view none of these reason are valid or justify the erosion of this fundamental right. It is not a mistake as to the existence of a law but a mistake as to certain facts that bring about the defence.

If the landholder has not made a genuine mistake the defence is not available.

The Bill will make the landholder guilty whether he has made a, mistake or not.

Burden of Proof

Based on the Latin term *ei incumbit probatio qui dicit, non qui negat* (the burden of proof lies upon him who affirms not he who denies) it was described as the "one golden thread" in the web of English criminal law and a basic protection enjoyed by all Australian citizens.

The Bill proposes to reverse the burden of proof which to me is one of the most alarming aspects

The States reasons are that

- Offences often occur in remote areas and the State might find it hard to collect evidence as to who did the clearing
- It is unlikely a third party would undertake the clearing without a landholders knowledge
- The landholder may provide evidence of innocence.

In my view these reasons are weak cannot be maintained. The second reason negates the first.

The State has at its disposal some of the most sophisticated imagery available and can detect tree clearing of even very small scale practically in real time.

The Bill is designed to deter landholders from exercising even legitimate rights to clear vegetation in the face of prosecution where they are presumed guilty unless they can prove their innocence. The cost proving themselves innocence would be astronomical.

Legislative Standards Act 1992

The basis function of the Act is to ensure the Parliament does not legislate contrary to the rule of law.

Section 4 provides

Meaning of fundamental legislative principles

(1) For the purposes of this Act, fundamental legislative principles are the principles relating to legislation that underlie a parliamentary democracy based on the rule of law.

(2) The principles include requiring that legislation has sufficient regard to—

3) Whether legislation has sufficient regard to rights and liberties of individuals depends on whether, for example, the legislation—

(a) makes rights and liberties, or obligations, dependent on administrative power only if the power is sufficiently defined and subject to appropriate review;

(b) is consistent with principles of natural justice;

(d) does not reverse the onus of proof in criminal proceedings without adequate justification;

(g) does not adversely affect rights and liberties, or impose obligations, retrospectively

Comments

The Bill will:

- impact upon the rights and liberties of landholders
- deny the principles of natural justice
- reverse the onus of proof
- impact on rights retrospectively

Valid applications lodged with DILGP in December 2015 and January 2016 were refused on the basis they were not properly made as there was no S22A approval. DNRM has refused to give the approval and both matters were intentionally delayed until the 17th March 2016. The rights of applicants to make an application and have it dealt with according to law will be taken away retrospectively by the Bill in breach of S4 (3)(G) LSA

Consultation

Limited consultation was undertaken in the development of the Bill, in particular with landholders, industry groups and other stakeholders

There was considerable consultation with and influence by Environmental groups in relation to the formulation and introduction of the Bill.

Compensation

The Bill confirms that no compensation will be payable by the State as a consequence of the division that relates to the interim period.

Myths and Mysteries

- There has been no panic clearing.
- Landholders did not have an open slather under existing legislation policies and codes.
- Queensland's woodlands are generally carbon neutral due to natural fire regimes.
- Healthy growing crops will sequester carbon at many times the rate of woodlands.
- Runoff is impacted by loss of ground cover not trees.
- Clearing west of the Great Dividing Range has no potential impact on the Great Barrier Reef.
- There has been no destruction of Koala habitat in Cape York of the Gulf of Carpentaria
- There has been no destruction of rare and threatened species.
- There have been no breaches of the NCA or the EPBC Act.

Submission 3

- **The is no need to amend the Vegetation Management Act or the Sustainable Planning Act as to do so will take away the opportunity for clearing native vegetation for high value and irrigated high value agriculture.**
- **With greater co-operation between the landholder DNRM and DAFF integrity around the process can be improved**
- **Strathmore Station a case in point.**

Strathmore Station



Striking a balance between sorghum production and trees on Strathmore Station under existing laws.

Scott Alexander Harris is the registered lessee and lives on Strathmore with his wife Kerry and son Harry. Two other children are away at school.

Harris purchased Strathmore in 2004 and presented the State Government with detailed and fully costed plan for the future development of the property with an emphasis on beef cattle and grain.

Strathmore was heavily impacted by the Wild Rivers Act in 2004 which restricted the use of 2/3 of the property.

The 2014 changes to the Vegetation Management Act provided Harris with an opportunity to implement the plan.

Harris also holds Kingvale Station in the Cape and over 60,000 hectares of fattening country in the Tambo region as part of his grain and cattle enterprise.

Strathmore Station:

- is the **largest single leasehold** cattle property in Queensland comprising 901,000 hectares situated in the Gulf Country encompassing the Gilbert, Einasleigh and Red Rivers and north to the Staaten River situated between the towns of Croydon and Georgetown.
- is the **largest privately owned** and funded agribusiness operation in North Queensland comprising integrated cattle and grain production.
- has injected **\$25m** into the regional economy during development
- will inject another **\$25m** into regional economy in future stages
- will earn up to **\$180million pa** for the Queensland economy and create over **300 jobs** in the region.
- currently **employs more people** than the Etheridge and Croydon Shire Councils.
- will create **opportunities for Traditional Owner** groups to participate in the regional economy with real jobs.

The major ingredients to the successful future of the Strathmore project are

- **Security of tenure** to support investment
- **Access to water** to guarantee security
- **Vegetation Management** to support productivity
- **Partnerships** with traditional owners, community and local authorities
- **Regional infrastructure** roads port and power.

Project Outline

Stage 1 (approved and being implemented)

- plant 60,000 hectares sorghum Strathmore
- construct 6,000 ML water storage facility
- plant 3,000 ha sorghum Kingvale
- double herd size >100,000 head
- produce 150,000 tonne grain
- Kingvale used as collection point for Cape cattle (including Indigenous properties)
- Kingvale cattle to be transported to Strathmore for backgrounding
- Live cattle export opportunities.

(Appendix 4, 5 and 6)

Stage 2 (approval pending)

- 10,000 ha sorghum north of the Einasleigh River
- Construct 220,000ML water storage off river Dismal /Waterloo facility
- Irrigate 22,000 hectares mixed crops (sorghum, mung beans, soya beans, cotton etc)

Potential Economic Benefit to region

Stage 1

- Clearing and land recovery **\$25m**
- Clearing and land recovery **\$25m**
- Production **\$80m pa**
 - Dryland sorghum 60,000ha
 - Cattle up to 100,000 breeders
 - Cattle backgrounding 20,000 head

Stage 2

- Clearing and land recovery and water infrastructure **\$25m**
- Production up to **\$100 m** per annum cattle, sorghum and irrigation.

Employment

Direct	85 Queenslanders (currently) 200 + Queenslanders on property (potentially) Mustering, fencing, machinery operators, mechanics and diesel fitters, transport operators, general hands, cook domestic staff, administration, irrigation operators etc
Indirect	Create jobs for 100 + people off property Service jobs in towns Croydon and Georgetown, western cape cattle enterprise, fencing, mustering weed control, contracts, provisioning etc

Vegetation Management

Stage 1	26,000 ha complete
Stage 2	24,000ha complete
Stage 3	10,000 ha (awaiting approval)

Conservation considerations

Impact on bioregion

To put the clearing on Strathmore into perspective

If all areas applied for were cleared the total area as a percentage of

- the land mass of Queensland of 185,300,000 ha would be **.03%**
- The Gulf Bioregion 21,980,000 ha **.27%**
- Strathmore lease area 900,001 ha **6.6%**

(Appendix 7 and 8)

Environment:

Department of Environment (EPBC Act) and Department of Environment and Heritage Protection (NCA) inspected Strathmore in December 2015. Nothing of significance was recorded.

Weed and Feral animal

At the time of purchase Strathmore had a serious weed and feral animal problem. The waterways were choked with rubber vine which was killing off the riverine trees and destabilizing the river banks. The rubber vine was spreading kilometres away from the river systems. There were also expansive infestations of chinee apple and other weeds. Strathmore was overrun with pigs and as a result wild dogs.

Harris has made significant inroads to reducing rubber vine, chinee apple, pigs and wild dogs as part of the vegetation management process all at his own cost.

Appendix 9, 10, 11 and 12)

Drought resistance

Harris has proven over many years that the growing, harvesting and storing of sorghum as silage can provide considerable safeguards against the impacts of drought.

Silage can be grown on a relatively small area and accumulated over a number of years due to its long shelf life to be fed out as ration to stock in times of drought. It cuts the purchase and delivery cost of hay and is readily available.

As drought is increasingly becoming a feature of our rural landscape more and more farmers are turning to clearing for the production of crops and grain for drought relief.

To take away the ability to clear native vegetation for the production of grain and the utilization of stubble and silage as stock feed will make all Queensland graziers more vulnerable to prolonged drought.

Conclusion

- 1) **The Vegetation Management (Reinstatement) and Other Legislation Amendment Bill 2016 so far as it relates to banning the clearing of native vegetation for high value and irrigated high value agriculture should not be passed by the Parliament.**
- 2) **The Bill violates fundamental principles of the presumption of innocence and the defence of mistake contrary to legal rights enshrined in our legal system.**
- 3) **Changes to policy, codes and process have made it impossible to obtain a development approval for clearing of native vegetation irrespective of whether the Bill passes or not.**
- 4) **The existing VMA and SPA are entirely appropriate from an administrative, environmental, economical and practical viewpoint.**
- 5) **Modification to previously existing policies, codes and processes in collaboration with Departments could bring improved rigour and integrity to approvals.**
- 6) **The Bill will have significant negative impact upon the Queensland economy and prove a disaster to the growth of agriculture in the State**

For and on behalf of Scott Harris

David Kempton

Land Tenure Services



29th April 2016

Appendix List

Appendix 1	Table of SDAP Amendments
Appendix 2	Photograph depicting drainage feature described as watercourse
Appendix 3	Letter to Deputy Premier dated 12 th December 2016
Appendix 4	Sorghum ready for harvest Strathmore 2014
Appendix 5	Sorghum ready for harvest for silage 2014
Appendix 6	Headers on Strathmore 2014
Appendix 7	Map of bioregions Queensland
Appendix 8	Map depicting clearing as % of bioregion
Appendix 9	Rubber vine infestation Strathmore
Appendix 10	Riparian rubber vine infestation Strathmore
Appendix 11	Before clearing
Appendix 12	After clearing with sorghum crop

STRATHMORE STATION - EXTENT OF CLEARING AND PROPOSED CLEARING WITHIN GULF BIOGEOGRAPHIC REGION







