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Agriculture and Environment Committee  
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Dear Director ,

The scope of this legislation of 29 pages fails to encompass the 69 pages of the Cripps Vegetation Amendments.

There are some Queensland wide themes that have commonality and high priority. These include Broad scale clearing and clearing Priority Development Areas (PDAs) /State Development/Crown Land clearing. The loss of High Value Regrowth as periurban land ,rural land and koala habitat is documented by SLATS. The loss of Koala Essential Habitat. loss of Old Growth Forest (largely unmapped), loss of Threatened Species Habitat and loss of refugia, regional, niche, endemic & local ecosystems /vegetation alliances, and loss of Rainforest and dry scrubs are iconic items not mapped on a regular basis. There existed other vegetation related programs, institutional arrangements, branches ,units and legislation gutted by the LNP (not all disclosed).

#### **Interventions**

There are intervening actions which affect vegetation such as the unsustainable Jackie Trad's draft Planning Legislation and Regulations 2015 , State Development and Public Works Organisation Act...and Economic Development Qld programs, Building Qld Act, Offsets Act 2014 , and Local and Federal Offsets which override keeping trees even developers want to keep.

**The LNP Removal of DNR/EHP/Department of Science Information Technology and Innovation(DSITI) Veto, Referrals and advice to State Assessment and Referral Agency (SARA )(DILGP) etc. *should be reversed.***

There are related frameworks and legislation(gone or in limbo) such as Regional Plans, Coastal Plans and mapping, old QPP framework including PRIORITY SPECIES (2 lists)/Planning Schemes/layers and Greenspace which require maintenance and Reinstatement for ecosystems protection.

With the lack of protection for Biodiversity generally across all three levels of Government, vegetation remains a limited surrogate, and threatened because of; severance, understorey clearing/ food web removal, firing and escalating feral species. More sophisticated reporting and spread of vegetation and related mapping products (essential habitat mapping) are imperative.

#### **Scientific Advances and losses**

The advances of Green Fauna Infrastructure , Climate Change Programs, Climate Refugia and Climate Change Corridors, original Biodiversity Planning Assessments (BPA) Corridors, Biodiversity Hotspots,

Greenspace and Ecosystem Services/NRM Plans require further science and program backing, and insertion into the mainstream policy and legislation in spite of State and Federal propaganda. The ineffectiveness of the EPBC Act and loss of DEWPAC 's 600 staff /300 CSIRO staff in relation to vegetation , Rare &Threatened Species, and Connectivity etc remains a catastrophe.

### **Other Legislation and Programs**

The sustainable outcomes needed, have to reverse the LNP VMA changes but also to effect changes to related vegetation issues in; Mining (EMOS /EISs and rehabilitation – clearing 5,000ha p.a.), New High Value Agricultural Schemes (100,000 ha), Resumption Agencies (no real-time rehab or no real time severance buyback budget) and Planning entities with fast tracking, greenlightoffsets/mantras and programs in the longer term, not just to look for a 2011 Benchmark.

There are related issues in trying to tie to evidence of multiple Federal programs of Climate, Carbon, **Exemptions**, Subsidies, unsustainable Offsets and International Agreements, while missing; methane, mitigation , “following the money”, best practice, enforcement and registers.

### **VMA Benchmarks.**

The issues of clearing: in GBR catchments, in Central and North QLD as self-assessable, as of right, regrowth, code and Property Map of Assessable Vegetation (PMAVs) permits etc do not stand up to accumulated impacts because of; lack of transparency, fundamental losses, lack of inspections and lack of regrowth and discrete remapping, hidden processes , delayed monitoring ,loss of staff, and lack of post impacts monitoring.

The Wet Tropics, GBR, Gulf and Cape York have some additional and different problems, but there is still triggering of catastrophic Brigalow clearing.

**The proposed Veg Legislation (29p) does not reach 2009-2011 standards.**

### **The Long Term Reforms should include:**

1. **High Value Regrowth protection and Remapping** since 2010(2008) needed. The coastal HV Regrowth constitutes half the Koala habitat in some Regions There was 3M ha of regrowth in 2010.
2. **Koala Habitat protection.** Mapping exists by Australia Koala Foundation (Qld) and some by SEQ Catchments for South-east Queensland. WWF states 40,000 ha of Qld Koala Habitat were lost in 2012-14. Meta data koala mapping exists in northern NSW, and we need to have something similar. Loss of The SEQ Koala Habitat Mapping program DSITI 2013 remains unexplained? About **six types of Koala mapping warrant reinstatement and the old SPP Koalas extended especially** for the needed declaration of the Koala as Qld Endangered and a Recovery Plan.(C/W and Qld). IE Koala Habitat Mapping, Observation map, and incident map, Genome map, Essential Habitat Mapping , Rehabilitation Areas map, Tipping point populations map.
3. **Protection for Urban Footprint Vegetation.** It is about 30,000 ha Remnant in SEQ and 54,000 ha of regrowth. This relates to the contentious issues ; the urban exemption clause, PMAVs, offsets, Broad hectare studies, Investigation Areas, Loss of 6 Greenspace programs, Emerging Communities Zonings, Preliminary Approvals, State land clearing, Land Tax paid by Councils and absent owners on bushland etc.
4. New Protection is needed for; **Coastal wetland, coastal vegetation and remnant sites/Reconfiguring a lot (ROL) Transfers (Old Coastal Plans and maps) . This is essential for coastal Tourism .** The iconic ,unmapped and undefined **Biodiversity Hotspots** (new) are islands .The Lowland fauna is being forced into oblivion or uplands.
5. Protection is needed for; Climate Refugia, (should have been in 2000 VMA) Climate change corridors and adaptation - (new) and a range of “Of Concern” Regional Ecosystems (new) , unprotected rainforest REs (new) Biodiversity Planning Assessment Corridors (new)and High Ecological Significance(HES)/AES (new),
6. New Release of: Qld Offset mapping in all bioregions, "Vegetation Network "and Framework , Priority Species mapping are needed (INTERNAL PROGRAMS). The Review of Offsets - registers to find destinations of money and lands are warranted. This needs further explanation & RTI.

7. Review of High Value Agriculture Clearing, possible wind back of uncleared 100,000 ha of approvals, reporting and publication of "schemes". The Renegotiation of other unused permits needs to be addressed. (precedents in the Murray Darling)
8. Reversal of self assessable and as of right clearing because of: impacts generally, mapping/ reporting anomalies, loss of connectivity, and deleterious changes to Nature Conservation Act, GBR Catchment Impacts, and carbon and greenhouse gasses. Separate reports are warranted.
9. Staffing of **DSITI(State Land and Trees-SLATS)**, Herbarium, **EHP**, DNR need upgrading & training because of complete loss of koala units, and expert scientists across 4 agencies..
10. **Tract mapping** (SEQ Catchments 2008) **and reporting to see fragmentation and what is left**, with road rail etc resumptions and future permitted clearing is warranted in each bioregion subtracting other threats of: state developments, PDAs, Mining leases etc, PMAVs, & Resumptions. (This is a threat map.) – The mapping and metadata of what is left is urgently needed in order to join up climate change and other corridors, use Green Fauna Infrastructure and seek other protections and investment for sustainable and defensible landscapes.
11. Reversal of Brigalow bioregion clearing policy, with landscape severance, on and offsite impacts, salinity i.e. Clearing of Peak Vale, Clontarf etc in the Drummond Range. Mapping of Dry Scrubs and Regrowth is imperative, (some EPBC Act Brigalow let out clause is yet to be confirmed).
12. Review of PMAV process including, application, advertising, objection, categories, inspection, remapping and registers. Some areas have dry rainforest, riparian rainforest, wet sclerophyll some in white space/category X (non-remnant vegetation) and unmapped Regional Ecosystems in other polygons and categories. Freehold CODE reinstatements and register are needed.
13. With the Qld Planning Provision (QPP) virtually gone, losses of Priority Species (plants and fauna) in future Planning Schemes, the Biodiversity and Mapping Methodology (BAMM) Priority Species lists for each Bioregion should feature in the Vegetation Management Act.
14. The override of the vegetation local laws and planning schemes tree protection by VMA permits on acreage, for Greenhouses and IGLOOS, industrial rural industry, and mandatory developer offset money contributions and green light for clearing (instead of tree retention) at 3 levels of government should be outlawed.
15. Some Threatened landscapes include Coastal Lowlands, rainforest and dry scrubs, wetlands, and near native grasslands (not mapped by Herbarium). Threat Maps are needed (See 10)
16. **QLD GREENSPACE STRATEGY** - This was a spin off of some Regional Plans with about six programs (Inter Urban Breaks, Trails, Green infrastructure etc) some unfunded but with program lines and outcomes existed. There is no Greenspace or Regional Open Space to compensate for; broad scale or PDA clearing, Infill, Industrial, Medium Density and High Rise and other Mega development. Park and Bushland developer contributions are no longer taken in some Councils-just the insufficient money in lieu. Emerging Communities zones and Investigation Areas (State and Local) and Preliminary Approvals, no longer have vegetation surveys/mapping, reporting and publication. See BCC, LCC, Ipswich City Council. **The introduction of Greenspace Strategy into the VMA and Regional Plans is ecologically fundamental and a lifestyle catchup.**

WE have an opportunity to make this Vegetation Management Act better.

TED FENSOM

Brisbane Regional Environment Council

