



## AgForce Queensland Farmers Limited

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Ref: CB/TB/GG020

10 July 2017

Committee Secretary  
Agriculture and Environment Committee  
Parliament House  
George Street  
Brisbane QLD 4000

By Post & by Email: [aec@parliament.qld.gov.au](mailto:aec@parliament.qld.gov.au)

To Whom It May Concern

### Re: Nature Conservation (Special Wildlife Reserves) and Other Legislation Amendment Bill 2017

AgForce is the peak rural group representing the majority of beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$5.7 billion in gross farm-gate value of production in 2014/15. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. Our members provide high-quality food and fibre products to Australian and overseas consumers, manage around 40% of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

Thank you for the opportunity to provide a submission to the *Nature Conservation (Special Wildlife Reserves) and Other Legislation Amendment Bill 2017* (Special Wildlife Reserves Bill). In April 2017 AgForce provided feedback on the exposure draft of this Bill, highlighting several significant issues for consideration. Many of the points raised in our earlier submission remain relevant and have been restated below, along with additional concerns regarding the Special Wildlife Reserves Bill. We believe these comments warrant consideration and look forward to the Committee's findings on the Bill.

- **Opposition to the Exclusion of Grazing**

Given the increasing food and fibre needs that will be required in the future, we oppose this Bill permanently removing land from agricultural production.

The policy objectives in the Explanatory Notes state there are '*no means of comprehensively and securely protecting areas of outstanding conservation value on privately owned land from a range of incompatible land uses*'. The Bill and explanatory notes further go on to indicate that s199A of the Land Act will be amended to permanently remove or long-term destock of a pastoral lease to '*protect the values for which the protected area has been declared*'. We also note the Department briefing provided to the committee on the 4 July 2017 stated commercial grazing would not be compatible with special wildlife reserves however, grazing may potentially be authorised as a management tool.

In contrast, AgForce argues that an area of actively used agricultural land has the ability to comprehensively and securely protect outstanding conservation values and in fact, over 4 million hectares, or 30% of the total protected areas in Queensland already do through the Nature Refuges program. The Department's own Nature Refuges program website states:

*“A nature refuge is an area of land voluntarily protected for conservation, while allowing compatible and sustainable land uses to continue.”*

AgForce has strongly supported the Nature Refuges program since 2007 because it combines conservation with sustainable production on private land. A significant percentage of the Nature Refuges estate is made up of AgForce members who manage the outstanding conservation values on their properties, whilst also maintaining the production values through commercial grazing practices. Furthermore, as per our previous submissions, grazing has proven to be beneficial for the control of fire and introduced grasses such as buffel grass. For some properties, the fact is that grazing is already co-existing with the values that may be identified through the process of declaring a special wildlife reserve, if it did not, the values would not exist. We argue that farming and protecting the environment is not incompatible and can occur simultaneously and this has been encouraged and proven through schemes like the Nature Refuges program.

- **Cost of Implementation and Management**

AgForce holds serious concerns regarding the cost of implementation of the Special Wildlife Reserves Bill and the ongoing management of these areas, both within government departments and privately.

The Queensland Government has a goal of increasing the protected area estate to 17% of the State’s total land area. We have long maintained that having a protected area program that sets targets based on hectares rather than conservation values is arbitrary and ineffective. We also know that simply locking away land does not always protect it, but rather opens the door to feral animal, pest and weed infestation and serious fire risks. AgForce anecdotally receives feedback from members that this occurs within the current public protected area estate. This leads us to conclude the current protected area estate is under-resourced. Additionally, the explanatory notes specifically state that the initial creation and management of special wildlife reserves will be undertaken by EHP staff within the existing NatureAssist budget. The core costs for Government have also been noted as well as the impact on the recruitment and support of the current nature refuges program. We restate our previously submitted recommendation:

*“... when creating a perpetual agreement, the management costs of delivering against the set management principles need to be calculated and provided for prior to the establishment of the agreement. AgForce submits that prior to the establishment of a new special wildlife reserve, provision should be made for at least 50 years of future management costs and that this money should be banked by the State Government, or otherwise provisioned for in a bond or financial guarantee. Similar guarantees are required of resource proponents and whilst it can be argued their risk profile is higher, the costs of managing private protected areas to a high standard in perpetuity are not inconsequential and so must be accounted for.”*

We continue to hold concerns regarding the future resourcing of the existing nature refuges estate and the ongoing recruitment and support of these areas for producers. If the Government is intent on creating two separate classes of private protected areas, ongoing budget allocations should be made and shared between both the nature refuges program and the special wildlife reserves program in line with the program needs. These budget allocations need to be agreed to and made clear *prior* to advancing the Special Wildlife Reserves Bill.

- **Risk of Default or Management Deferring Back to the State Government**

We have previously raised concerns regarding the risk of default of the deliverer of special wildlife reserves, stating examples where this has previously occurred. Specifically:

*“This has happened on countless occasions in the past, where Conservancies such as the Queensland Trust for Nature have been unable to meet their financial obligations and have therefore sought the Department of National Parks to take over management of the areas under their control. This presents an unacceptable financial risk to the State budget and jeopardises delivery of the management principles.”*

We maintain these concerns and do not believe they have been addressed in changes to the Bill. Additionally, the Bill’s explanatory notes include amendments to ensure that the State retains the option to continue a special wildlife reserve on leasehold land should a landholder surrender their lease or allow it to expire, essentially placing the management of the land under state responsibility adding to ongoing management costs borne by the State.

- **New Class of Protected Area**

The key objective of the Special Wildlife Reserves Bill is to establish a new class of privately owned or managed protected area, allowing for the protection of these areas from activities such as mining and gas. As per our previous submissions, AgForce supports the removal of mining interests from protected areas. However, we query why this is not being considered for the current nature refuges estate? AgForce has also had discussions with the Queensland Government related to these types of provisions on several occasions. By bringing in a ‘new class’ of privately owned or managed protected area it appears to discount the need to protect the current private protected area estate from mining. Noting our above concerns regarding the resources being taken away from the nature refuges program to implement the Special Wildlife Reserves Bill, in addition to the Government moving away from safeguarding the current private protected area estate from mining interests it appears the nature refuges program is being relegated to a ‘lower class’ of protected area.

- **Declaration of a Special Wildlife Reserve – Interested Parties**

The Special Wildlife Reserves Bill proposes a new section to the *Nature Conservation Act 1992* that the Minister, in considering a proposal to declare a special wildlife reserve, must notify any person who has an interest in the land that is subject of the proposal. AgForce proposes that where a proposal for a special wildlife reserve is made within agricultural land, for example in a strategic cropping area, neighbouring properties should be included in the list of interested parties. This is due to AgForce’s previous concerns regarding ongoing management and the pest, weed and fire risks of properties when not managed appropriately.

AgForce once again thanks the committee for the opportunity to provide feedback to the *Nature Conservation (Special Wildlife Reserves) Bill 2017*. We look forward to the Committee’s findings from the inquiry. Should the Committee have any further questions or comments, they can be directed to AgForce Policy Advisor, Tamara Badenoch, on [REDACTED] or [REDACTED]

Yours faithfully



Charles Burke  
Chief Executive Officer