



Burnett Mary

REGIONAL GROUP

Practical Solutions for Natural Resource Management

July 04, 2013

Parliament House
George Street
Brisbane Qld 4000

Re: Burnett Mary Regional Group Submission to the Nature Conservation Act (Protected Plants) and other Legislation Amendments Bill 2013.

Dear Mr Rickuss

The Burnett Mary Regional Group (BMRG) is the peak coordinating body for natural resource management in the Burnett Mary region, representing the combined interests of community, industry and government. The BMRG is tasked with the implementation and delivery of natural resource management initiatives involving biodiversity conservation (terrestrial, coastal / marine), sustainable agriculture practices and water quality improvement.

BMRG has taken the opportunity to conduct a review of the *Nature Conservation Act (Protected Plants) and Other Legislation Amendment Bill 2013* with specific reference to the effect the amendments will have on biodiversity and species at risk of extinction. The BMRG feels that the amendments have eroded the vital protection provided to plant species within Queensland and approve a relaxed approach to clearing. Option 2 will provide a reduction in 'green tape' and industry will have the opportunity to exploit our natural resources but this is a dangerous and makeshift approach to the conservation of Queensland biodiversity wealth.

As outlined within the Decision Regulatory Impact Statement 2013 (RIS), option 2 has been identified as the preferred approach which we feel provides a shift from majority protection to limited protecting of Queensland's most 'at risk' species and high value biodiversity assets. Although a number of items have been identified we have decided to focus on the most critical aspects which have the opportunity of being improved within the implementation of Option 2. The following recommendations aim at providing a balance between industry, development and conservation of Queensland's flora and are essential if the intent is to continue to meet the object of the Nature Conservation Act.

1. Inadequate species distribution data to determine EVNT 'high risk' mapping

It is doubtful if the current level of available data is adequate to clearly identify the bounds of the EVNT 'high risk' areas. Survey records are limited for most plant species with threatened species having key knowledge gaps as identified in the various Queensland Government species recovery plans. For option 2 to be successful there must be a commitment for improved data collection with the aim of identify actual species distribution extent and occurrence, new populations and improved 'high risk' area mapping. Under the Queensland Government's Back on Track Species Prioritisation Framework a criteria was identified for 'data deficient species'. This criteria needs to be considered under this process to ensure we are

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not losing species based on a lack of knowledge and resulting inadequate 'high risk' mapping.

2. Risk of clearing threatened species outside of EVNT 'high risk' areas

To further reduce the risk to threatened species we believe that surveys of probable habitat will be a critical inclusion to maintain existing populations and have some chance of recovery. This addition provides minimal due diligence and ensures we are not increasing the risk of extinction through clearing habitat that has poorly surveyed or not surveyed at all. This process will increase species distribution records, identify associated habitat areas, increase data collection for deficient species and reduce survey bias.

This process will not encumber industry and government as it will only be triggered for probably habitat of existing threatened species and surveys will only require a rapid assessment confirm or deny the target species presence.

3. No clear process for the identification of 'special biodiversity areas'

It has not been identified how and when the special biodiversity areas (SBA) will be developed. This will be a critical component as it provided a trigger mechanism for the legislation. There is a risk that limited SBA's will be identified which will see a further reduction in protection under Option 2. It is a priority that the finalised criterion is made available so that additional areas can be identified at the regional and local scale with Local Government and Regional Groups having the option of submitting new SBA's. This information should be transferable to the Queensland Governments Biodiversity Planning Assessment and Aquatic Conservation Assessment.

4. No definition of 'support areas' for existing threatened species

The support area has not been clearly defined. It is essential the support areas are defined not only by a minimum buffer width but actually considers the ecological requirements of the species being protected. To be committed to facilitating the recovery of threatened species the support area should consider a future increase in suitable habitat and encourage an increase in distribution extent through restoration activities.

5. Increased risk of extinction for existing threatened species

Due to the limitation identified in this submission it is feasible to consider that there will be a significant increase to the risk of extinction for existing threatened species. Under the vast majority of threatened species recovery plans a key requirement is to increase the understanding of the species extent and occurrence. Under the preferred Option 2, there will potentially be a loss of species extent and occurrence throughout Queensland which will result in an increase in species threat status as per the 'threatened species nomination' criteria.

6. Increased risk of extinction for 'least-concern' species

There is no process to monitor the reduction of extent and occurrence for 'least concern' species listed under the Conservation Act. To ensure species diversity and persistence it is essential that a process is developed to identify 'least concern' species that are on a trajectory of becoming threatened. It is not clear how this process will be managed under the new system and how often an assessment will be



conducted to identify the risk of extinction imposed on 'least concern' species. There needs to be a commitment to improve the assessment of rarity for Queensland flora to ensure that the threat status is current for all potentially impacted species. This information is a major component of the high risk trigger mapping and therefore needs to be kept relevant with all new threatened species added as a matter of urgency.

7. Lack of survey guidelines for when a flora survey is required

Currently no survey guidelines have been released so it is impossible to identify if the survey effort is going to be weak or robust. Flora surveys need to be thorough and aim to identify not only observable species but also the more cryptic species. The guidelines should factor in this aspect and provide a robust sampling method to ensure we are not losing existing threatened species through a lack of survey effort and rigour.

Thank you for providing the opportunity to comment on the relevant legislative amendments as listed above. I trust this information will be considered and is found useful. If you wish to discuss this matter further please do not hesitate to contact Rod Buchanan on telephone 0488063790

Yours sincerely

Penny Hall
Chief Executive Officer