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The Research Director
State Development, Infrastructure and Industry Committee
Parliament House
George Street
Brisbane Qld 4000

E: SDIIC@parliament.qld.gov.au

Land and Other Legislation Amendment Bill 2014

CCC supports positive arguments for pastoral lessees to get into tourism (e.g. they can reduce impact on the land if not totally grazing focussed) but this step is usually inhibited by native title rules and therefore difficult to support with considerable consultation.

The securing of protected area estate is just as likely to involve freehold land as lease land and usually purchase prices above valuation is the norm.

There are concerns about the impact of the proposed changes on urban and urban fringe lands, for example the protection of agricultural soils in urban fringes. The open space schemes which are faltering in SEQ and non-urbanization of most suitable pastoral/agricultural land should be supported. Similarly there needs to be increased protection for important catchment areas (mountains and hills) and non-alienation of coastal land. These matters form a key component of the current Great Barrier Reef World Heritage Area Strategic Assessment

As applications for lease renewal will no longer be required, a lease holders land management history and the properties condition will no longer be assessed independently. This means there will no longer be an opportunity to consider whether the purpose of the lease is still the best use of that place and gives best use and economic return to the whole community, not just the lease holder.

Automatic extension of leases is against competition principles and removes the opportunity and imperative for ecosystem health assessments (State of Environment reports). Biodiversity covenants, nature refugees, property management based on ecologically sustainable development principles, may be lost as freehold properties or lengthy leaseholds transfer from owner to owner and from varying land uses. It would be an abrogation of government responsibility to allow this to happen without sound scientific oversight and public accountability.

The intention is stated for offshore island tourism to be given greater certainty of tenure. The following example should illustrate the potential escalation of ecological risks to Great Barrier Reef islands (already in serious decline especially in the southern section of the Reef), and a loss of public input, access and stewardship.

Great Keppel Island (GKI) has a chequered history of resort operation. Small operators often survive market and climatic turbulence, whereas large operations go through repeated economic boom and bust cycles. The positive and negative economic effects are felt in the broader community. The ecological effects result in a steady decline in the integrity of habitats and

aesthetics, the main reason why people want to visit. GKI has been subject to many archaeological, environmental and 'most appropriate land use' studies since the 1980s. Despite these technical studies and associated public consultation, a series of major leaseholders have failed to meet basic lease environmental management requirements. As a result the island natural values are under assault from declared noxious weeds, feral goats, soil erosion, increased fire risk, surface and ground water quality deterioration. Illegal structures, (e.g. Middle Island Underwater Observatory, apparently abandoned since 2009, permit expired in 2013) in the adjacent Marine Park add to the concern about the failure of duty of care by government to police land management conditions.

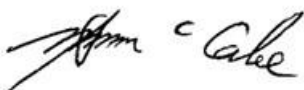
The (original) Livingstone Shire Council town plan ('*Living for Lifestyle*' 2005 Planning Scheme) mapped the majority of the relatively undeveloped part of GKI (Lot 21) for conservation purposes. The EPA Land Evaluation Report (2009) recommended the most appropriate use as *conservation based on the significant natural and cultural values* and 'most appropriate tenure' Tenure as '*protected area*' under the Nature Conservation Act 1992. The Land Act changes appear to ignore lesson of history and could override such technical and properly consulted reports by enabling automatic lease renewals or conversion to freehold. The uncertainty of tenure has little to do with the success or failure of tourism project along the Queensland Coast and islands. International market forces and self imposed delays (GKI Resorts Pty Ltd has announced that despite having obtained all approvals in 2013, they will hold off for another year awaiting a casino licence bid.) Giving lease holder longer terms will not overcome the range externalities which affect the viability big tourism projects.

CCC submits that the proposed changes to the Lands Act would allow current and future leaseholders to continue to flaunt the lease requirements for developing and implementing environmental management plans. Changes to the Lands Act enabling the automatic extension of such leases without due oversight would be totally irresponsible. Enabling the conversion of such leases especially to freehold will not aid the quest to promote domestic and international tourism if the proposed Land Act weakens environmental management requirements. Such moves would add to the risk that the GBR World Heritage Area 'outstanding universal values' be assessed as being 'in danger'.

Rural lease holders who in the main have been making great efforts to improve sustainable land use will no longer be required to enter into a land management agreement to continue to hold a lease over State lands. This would be a loss for future operators and for biodiversity if the Land Act Changes remove the incentive to comply with ESD practices.

The Committee must exercise extreme caution and not allow repeat of the massive loss of soil water quality and natural ecosystem health of the past 150 year to be repeated.

Yours sincerely



Michael McCabe
Coordinator