



Mr. David Gibson MP
Chair
State Development, Infrastructure and Industry Committee
Parliament House
Brisbane 4000

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10th April 2013

Dear Mr Gibson

RE: Submission on *Vegetation Management Framework Amendment Bill 2013 (Qld)*

I have been directed by the State Council of the Wildlife Preservation Society of Queensland (Wildlife Queensland) to forward a submission for consideration by your committee on the above legislation.

Wildlife Queensland is one of the most respected wildlife-focused conservation groups in Queensland. With over 5000 supporters spread across numerous branches throughout Queensland, Wildlife Queensland is a strong voice for our wildlife and its habitat.

Wildlife Queensland is apolitical. Our aims include;

- **Preserve** the flora and fauna of Australia by all lawful means
- **Educate** the community in an understanding of the principles of conservation and preservation of the natural environment
- **Discourage** by all legal means, the possible destruction, exploitation and unnecessary development of any part of the natural environment.
- **Encourage** rational land use and proper land planning of existing and future development, and the use of the natural environment and its management.

Wildlife Queensland welcomes the opportunity to make comment. Wildlife Queensland will offer comment on matters of particular concern. There are many aspects and details of this Bill on which no comment will be offered.. It should not be construed such matters has Wildlife Queensland's support.

Wildlife Queensland appreciates the necessity to achieve a balance among conservation of our biodiversity, provision for ecologically sustainable and economically viable industries and satisfying community needs. Unfortunately it is a well establish fact that our biodiversity is in decline (Natural Resource Management Ministerial Council, 2010; Department of Environment and Resource Management, 2011). Many factors contribute to this well established fact. Managing vegetation appropriately and reducing unnecessary clearing are major factors that at least attempt to arrest the decline trend in our biodiversity. Sound management of our vegetation not only benefits our biodiversity it affords protection to water quality, assists in sequester carbon, safeguards soil quality and also

provides enjoyment for the people. Also land clearing when it impacts on matters of national environmental significance is a key threatening process under the Commonwealth *Environment Protection and Biodiversity Conservation Act* (EPBC). Another issue that warrants consideration is although our knowledge of Queensland's flora is very sound due to extensive work by the Queensland Herbarium knowledge gaps exist in the occurrence and distribution of species let alone the numerous new species described annually. This Bill certainly has the potential to place aspects of Queensland's flora at risk.

This Bill on the whole will only exacerbate the downward trend in the decline of our biodiversity. It is a retrograde step for the environment and the greatest rollback of environmental protection ever witnessed. What is even more frustrating is it breaks an election commitment of Premier Newman to retain the existing level of protection that existed under the *Vegetation Management Act 1999*. It is noted that the legislation is to regulate clearing in a way that allows for 'sustainable land use'. The devil is always in the detail and the use of the term 'sustainable land use' in this circumstance must be called into question. It is a well known and scientifically based fact that continued erosion of our native vegetation is inconsistent with any broad consideration of what is sustainable land use.

Major concerns

There are several major concerns from Wildlife Queensland's perspective. These include but are not necessarily limited to the following:

- The potential for massive additional unnecessary clearing of Queensland's vegetation. The possibility of broad scale clearing could undoubtedly emerge posing threats to Matters of National Environmental Significance triggering the Commonwealth EPBC Act. Allegedly the intention of this Bill is to reduce uncertainty and green tape but there is a strong possibility of the reverse occurring.
- It will weaken protection of vegetation in a number of catchments throughout the state excluding the three Great Barrier Reef catchments still protected under legislation. Water quality will be at risk.
- The additional relevant purposes for which clearing applications can be made could see the reintroduction of broad scale clearing in a major way. It could even be argued that the additional relevant purposes are in fact in conflict with the intent of the Act.
- The lack of scientific and economic rigour with the declaration of high value agriculture areas, irrigated high value agriculture areas and environmental clearing is a distinct possibility. While there are some guidelines it appears such declarations may occur where the Minister deems it necessary. Of major concern is environmental clearing. Advice to hand indicates environmental clearing is for flood works. Some 'environmental clearing' in the Lockyer Valley following the devastating floods of 2011 has proved to be an absolute environmental disaster with creek banks collapsing.
- The introduction of simplified 'regulated vegetation maps' will lead to inappropriate clearing of vegetation. Furthermore the removal of near threatened species adds to the potential of the conservation status of such species being diminished.
- The removal of all the wild river provisions from the VMA will decrease the rigour under which clearing is assessed.

- The enforcement and compliance provisions have been weakened immensely with the expansion of defences and the removal of conditions under which forfeiture of leases can occur.
- There are concerns about the Ministers capacity and ability to make self assessable codes for a range of activities. While broad guidelines are provided in the Bill the self assessable codes are not available for examination and the devil is in the detail. However Wildlife Queensland advises that a self assessable code for the use and harvesting of mulga (*Acacia aneura*) for fodder would not necessarily be opposed.

The use and harvesting of mulga for fodder

Wildlife Queensland has for many years advocated the current guidelines are not appropriate, Wildlife Queensland recognises that the mulga lands bioregion is one if not the most naturally unstable land systems in Queensland. There is no question that aspects of the mulga landscape are under pressure from a biological point of view as evidenced by an estimated 80% decrease in koala populations since 1990. These lands have produced quality food and fibre for over 140 years and on a continental scale possess reasonable vegetation coverage and the majority of regional ecosystems are captured in the protected area estate.

There exists a misapprehension that harvesting mulga for fodder is broadscale tree clearing. Wildlife Queensland opposes that view but should harvesting of mulga for fodder be accompanied by sowing pastures plants then that is development and must be treated under the VMA. Beeton (2005), Boyland (2006) and Page et al (2008) have all advocated that Government acknowledge fodder harvesting of mulga is not broad scale clearing. The current prescriptive guidelines for harvesting mulga are resulting in suboptimal outcomes for the environment and production. The historical, uncoordinated and resultant mosaic effect of different fodder management activities on individual properties was in all likelihood the best strategy for the conservation of biodiversity in the absence of any monitoring or structural management at a regional scale according to Page et al.

Wildlife Queensland would not be opposed to harvesting of mulga being an exempt activity under the VMA subject to a self assessable code being developed jointly by landholders, industry, government and other interested parties having regard to relevant research findings. Mulga harvesting should be presented as a separate activity in SLATS data.

Conclusion

The primary aim of the VMA was to ensure the clearing of vegetation was so regulated to afford protection to remnant vegetation, assist in biodiversity conservation, minimise land degradation and facilitate ecological processes to continue.

This Bill does not maintain the primary thrust of the VMA. It has the potential to accelerate the downward trend of biodiversity loss, there is the distinct possibility of causing adverse environmental harm.

With the exception of addressing the existing short fall in the use and harvesting of mulga and that is subject to an appropriate self assessable code being developed Wildlife Queensland is opposed to the Bill.

Yours sincerely



Des Boyland, Policies and Campaigns Manager on behalf of Wildlife Queensland

References

Beeton R. J. S., Page, M., Slaughter, G and Greenfield, R. (2005) Study of Fodder Harvesting in Mulga Regional Ecosystems. University of Queensland, Gatton.

Boyland, D. E., (2006). Sustainable Harvesting of Mulga for Fodder in the Mulga Lands. Report to Queensland Government. Brisbane

Department of Environment and Resource Management (2011). Building Nature's Resilience. Government Printer, Brisbane.

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Page M., Witt G.B., Noel M., Slaughter G. and Beeton R.J.S. (2008). Economic and environmental analysis of fodder harvesting practices associated with mulga (*Acacia aneura*) and fire management practices in the mulga lands of south western Queensland. The University of Queensland, Gatton.