My husband Greg & I, as part of a small family company, own and manage 'Cunnyana', south of Mitchell, Queensland. We both hold Diplomas in Beef Cattle Production and Rural Business Management along with a combined 30+ years' experience in the agricultural industry. I am currently a Director on the AgForce Qld Farmers Board and also the Southern Inland Regional President. I am a board member of the National Farmers Federation.

We provide this submission in respect of the proposed Vegetation Management and Other Legislation Amendment Bill 2018 to be included in the SDNRAIDC's detailed consideration.

In our opinion the presented Vegetation Management and Other Legislation Amendment Bill 2018 is restrictive and onerous and does not reflect the expert knowledge and understanding that landholders hold after decades of sustainable land management. It lacks independent scientific rigour and does not allow for the long term sustainable management of agricultural lands in Queensland.

We do not in any way support broad scale land clearing or land degradation. We also do not support and cannot operate with our industry being heavily regulated and debilitated by the proposed vegetation management laws.

1. Self-Assessable Codes, particularly the Thinning Code

Over the last couple of years, we have used the Self Assessable Thinning Codes. The areas we focused on were severely degraded due to a monoculture of young pine, which were choking out the large mature habitat trees and all native ground covers. The lack of ground cover led to erosion in certain areas. In the areas we have thinned, we are seeing a huge increase in ground cover, improved health of retained trees and the return of numerous birds and wildlife into these areas.

We found using the codes relatively straightforward. Due to the Self-Assessable nature and a mix of regional ecosystems within the areas thinned, we could assess on the go and leave areas of greater concern, not mapped, untouched.



Examples of extensive thickening on our property, some of which is too thick to walk through. Note a number the mature trees have died due to competition.





Thinning after two months. You can already see grass and ground covers starting to grow.



Thinning after two years. Ground cover, healthy mature trees as well as smaller immature regrowth trees.



Thinning again after two years. Healthy trees, with a myriad of native wildlife and birds returned to the area.

The proposed 'Management of Thickening Vegetation' (Clause 17 of the Bill (new s22B 'Requirements for vegetation clearing application for managing thickened vegetation' of the *Vegetation Management Act 1999*)) completely takes away opportunity for a landholder to assess vegetation types on the ground and once again looks at a broad-brush approach to vegetation management.

The Self Assessable Codes provided clear guidelines, with advice from the Queensland Herbarium, around acceptable thinning practices, tree densities and expected ecological outcomes. The removal of these codes leaves us once again in the position that, without substantial money for development applications and long delayed processes, we can no longer manage the landscape and must watch ecosystems degrade further.

The CSIRO report 'Review of "Science supporting revision of codes for self-assessed vegetation thinning and fodder harvesting in Queensland" more than once indicates that they do not have confidence in the skills and knowledge of landholders to sustainably manage agricultural land in Queensland; "We also suggest that it is not reasonable to expect a landholder or manager to be able to safely reach this decision in a landscape context" (pg6 Sec 2.6), however suggest that aerial mapping and satellite imagery would provide more accurate data.

The suggestion that aerial and satellite imagery would provide an accurate overview of the health of an ecosystem is absurd. An ecosystems health can only be assessed on a whole of landscape approach, not a focus on tree numbers. To see a landscape, you need be on the ground.

Suggesting that landholders would be unable to develop Area or Regional Management Plans, is both an insult and blatantly untrue. There are numerous examples of producers working together for greater environmental outcomes through Natural Resource Management Groups, Cluster Fencing, and Research & Development Projects.

The proposal that landholders should apply for Development Permits to undertake thinning in areas of demonstrated thickening, to a maximum of 10% or 400Ha whichever is lesser, leaves us wondering why Government would bother to include the option at all. The cost alone for a Development Permit (per lot number) substantially increases the cost per hectare of undertaking the work. In many cases producers who do not own their own machinery will be unable to attain the services of a contractor because of the limited land area.

The option to thin in many regional ecosystems has only be available to many landholders through the Self-Assessable Codes. The CSIRO report itself acknowledges "that by applying a thinning code broadly across bioregions that clearing is likely to take place in situations where thickening is part of a natural ecological cycle not a threatening process." (pg 3). By applying one broad rule the Government is going against the advice it has been provided. Only the use of tools such as the Self-Assessable Codes will allow for each regional ecosystem to be assessed on its individual attributes and thinned accordingly.

2. Fodder Harvesting

Fodder Harvesting is an essential management tool within our business. We have used it on numerous occasions to feed drought effected stock, otherwise leaving the timber, predominantly Mulga, to regenerate for future use.

The proposed 'Accepted Development Vegetation Clearing Code – Managing Fodder Harvesting', will severely impact on our ability to fodder harvest in the future. Areas of usable Mulga on our property fall into the 6.5.2, 6.5.17 & 6.3.18 Bioregions, which only allows for Selective harvesting; 'Felling individual fodder trees using a chainsaw, or selectively pushing individual fodder trees using a tractor or dozer. This practice should cause minimal damage to the surrounding vegetation' (section 4.2). The on-ground practicalities and costs associated with felling individual trees by mechanical means is something that has obviously not been taken into account in the development of this code.

The inclusion of restrictions such as those described in 4.3 Strip and Block Harvesting, mean that large sections of Mulga will be rendered useless for use in extended drought periods, such as those currently occurring in 66.3% of the state (6th March 2018, The Long Paddock).

The CSIRO report repeatedly raises changes in mapping status as an ongoing issue in fodder harvesting SAC, '...the current policy gap and deal with retrospective issues of remnant being degraded to the point it becomes mapped as 'non-remnant' and is no longer regulated'. Improved mapping and the continuing 'self-assessable' nature of fodder harvesting should limit if not exclude this possibility.

Restricting the area that can be harvested is, as stated in the CSIRO report, 'not a reasoned argument' for reducing the extent of fodder harvesting, however using the 'capacity for ecological recovery' should also not be a reasoned argument. Mulga used for fodder is rarely pulled out of

the ground and in most instances continues to grow along the ground, whilst seeding numerous new trees at the same time, significantly reducing any impacts on biodiversity or ecosystems.

3. Increasing compliance measures and penalties under vegetation management laws.

We strongly agree with strict compliance measures to reduce unlawful clearing and purposeful environmental damage.

However, the significant increase in penalty units and regulatory powers of officers under the act, suggest that the Government does not have confidence in the majority of landholders to do the 'right thing'. An honest mistake under the proposed Bill may mean losing everything you have worked hard for.

We are currently able to work productively alongside Department Vegetation Management Officers when planning around vegetation management, we absolutely do not want to go back to the concept of 'Tree Police'. It is far better to work with and not against each other for improved outcomes.

4. Other matters relevant to the Vegetation Management and Other Legislation Amendment Bill 2018 that the review committee should consider appropriate and worth some consideration

As producers we continually hear the rhetoric from conservation groups who do not fully understand how the Vegetation Management Act works on the ground and what it takes to adapt to the continual changes made to the legislation.

The focus of the proposed Bill is solely about environmental outcomes with no attempt to understand the impacts that ever-increasing land management costs will have on the broader community, costing jobs and economic stability in small regional towns. Whilst environmental outcomes are an important factor they should not be considered in isolation and need to include the broader social and economic impacts.

As a young family we are working hard to provide our children with a sustainable future on the land, however continual thickening, increasing cost and layers of red tape may mean that our land value decreases to a point that it is no longer a viable option for the future.

The continual political debate surrounding Vegetation Management is not going to achieve sustainable outcomes, either environmentally or economically. Until Government can come to the realisation that the only way to resolve this rollercoaster legislation is to sit down and have an open, consultative process, that produces the best outcomes for sustainability, we will do this once more at the next change in government.

Most farmers are responsible land managers and dedicate their life's work to managing sustainable rural properties. At a time when global demand for our food and fibre has never been higher, the Qld Government should be supporting food and fibre producers with new development opportunities and business sustainability. We just want fair and workable laws to grow more food, create jobs and look after the environment.

Thankyou for your careful consideration of our submission.

Signed:	SBK	Rbyant.	
Date:	22/03/2018		