SUBMISSION

We provide our submission rejecting proposed changes outlined in the Vegetation Management (Reinstatement) and Other Legislation Amendment Bill 2018 ("the Bill"). As landowners in the Blackall district of Queensland we bring a collective knowledge of our landscape informed by 80 years ownership of and experience in managing this landscape as well as over 20 years of contribution to the vegetation management debate through ministerial visits, participation in committees, workshops and submissions.

Opening remarks

- **Previous Labor governments have stood by PMAVs as a certifiable and quantifiable system approach to the treatment of regrowth. During this period of committee review, this government needs to make a clear public statement that endorses the PMAV system. In his speech to Queensland parliament when introducing the Bill the Minister for Natural Resources, Mines and Energy Hon A.J. Lynham stressed**

  'that the Labor government will honour the long held security provided to category X areas on a property map of assessable vegetation. Since 2004 all governments have provided certainty to landholders that areas shown as category X on a property map of assessable vegetation are, and continue to be, exempt from the vegetation management framework 8 Mar 2018 Vegetation Management and Other Legislation Amendment Bill'.

  It is imperative that the Minister demonstrates the government's independence of the push by green groups to stymie essential vegetation management by making this statement on PMAVS outside of Parliament and during the work of the Committee.

- **The public contempt shown on Twitter by senior politicians of the Queensland Labor government towards the agricultural community at the time of the introduction of 'the Bill' indicates that this is not a government that governs for all Queenslanders. It is hoped that these senior politicians will reflect on their actions and examine the findings of the committee in a fairminded fashion.**

- **The attack on PMAVS (Property maps of Assessable Vegetation) by WWF where a claim has been made that 'advanced secondary forests' are being 'locked up' shows the complete lack of understanding of the science and ecology of the landscapes in question and in particular what regrowth actually is. Our treescapes are classified as woodlands and to imply that they are forests and to use weasel words such as 'advanced secondary forest'(sic) to describe regrowth is an unwarranted attack on providing a practical solution to the issue of vegetation management that engages the land managers and their cooperation.**

- **The Bill's introduction in the Queensland Parliament on 8th March 2018 represents yet another variation to the Vegetation Management Framework, which has been amended over 18 times since its introduction in 1999. Although review is essential, the constant change in legislation driven by political imperatives rather than good science or in response to on ground fieldwork, severely impacts on the ability of farm managers to plan and implement effective long-term property and business management decisions. Ecological processes work in much longer timeframes and can be severely compromised when mismatching, constantly changing regulations are enforced.**

- **The situation pre the March 8th Bill, although not perfect, at least provided a step in the right direction towards a practical approach to the development of a holistic management framework that recognises the reality of the situation on ground, matched solution to problem and was district and ecosystem relevant. It was an attempt to provide flexibility, sustainable opportunities, and the ability to manage vegetation issues in a time-pertinent way as well as restoring some degree of autonomy and dignity to those who have invested their lives in agriculture in the State of Queensland.**

- **Summary**

The impacts of the proposed changes to the Vegetation Management Act include:

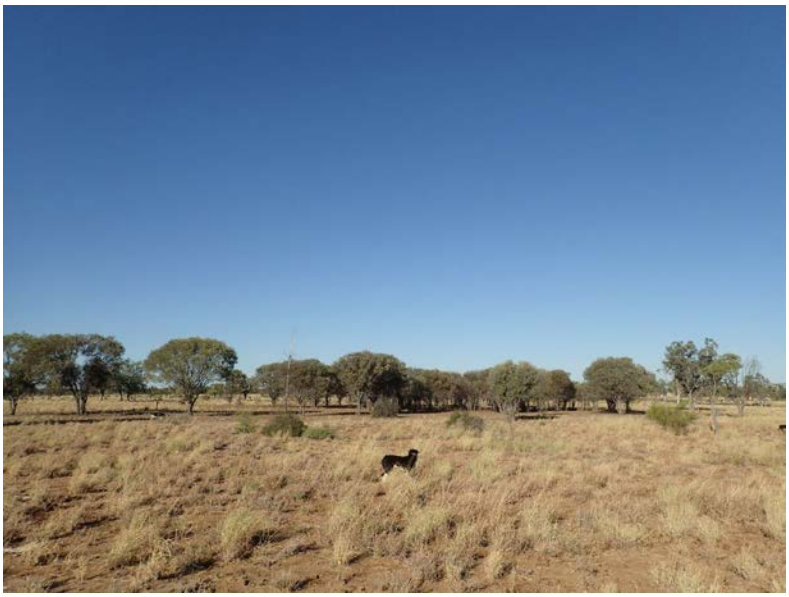
- Thinning will now require a Development Application to be lodged for approval
- Extends Category B areas (remnant vegetation) and Category C (regrowth vegetation) to freehold land, and indigenous freehold land. Additional 862 000ha High Value Regrowth and water course buffers to all reef catchment, Burnett Mary, Fitzroy, Eastern Cape York.
- The purpose for High Value Agriculture and Irrigated High Value Agriculture will be removed.
- Undermining existing Area Management Plans which leads to the undermining of trust.

It is imperative that the encroachment of invasive seedlings into native grasslands is not subject to a requirement for a development application or any further restrictions as has happened to thinning

- **Item 1. Thinning or as it is now called managing thickened vegetation**

- Prior to March 8th thinning of vegetation was able to be managed under a self-assessable code. That code was highly regulated in terms of ratio of trees to be left and methods to be used. The point of the code was to enable timely restoration of tree grass balance rather than being dependent on a planning system that has in the past not been able to provide Development applications when required.
- The amendments will further compromise our ability to manage ecological damage being caused by current rapid tree growth and regrowth.
- Our property is situated in the southern gidyea woodlands of the Mitchell Grass Downs bioregion. This area is now in its fifth year of drought. Despite the lack of rainfall, trees are demonstrably growing at a rate that is severely threatening the viability of significant grasslands.
- In discussions about vegetation management in relation to gidyea (*Acacia cambagei*) and invasive gidyea seedling growth, it has been advocated in the literature that natural cycles of thickening are balanced by natural cycles of thinning through events such as drought and fire. (Fensham et al., 2005, Fensham et al., 2009). (1)
- This is used as an argument against timely management of gidyea regrowth and invasive gidyea seedling.
- In our experience as land managers with consistent occupation for 81 years, and having seen both Wet and Dry and extended Drought events, that claimed “thinning” by droughts is not the case in relation to gidyea.

- **Case study: Norwood - The actual on ground picture 2017**
- This site was first shown to Government representatives in 1995 in order to demonstrate the destructive nature of gidyea seedling on grasslands. At that time there was a dead adult gidyea tree surrounded by waist high seedlings. Today the original tree has all but disappeared in the middle of the now immature trees all of which have survived.



- Figure 1 Norwood Blackall 2016: Note healthy tussocks in surrounding landscape

- Figure 2 Norwood Blackall 2016: Note area around group of trees has no tussocks

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- Figure 3 Norwood Blackall 2016: Note no understory or grass

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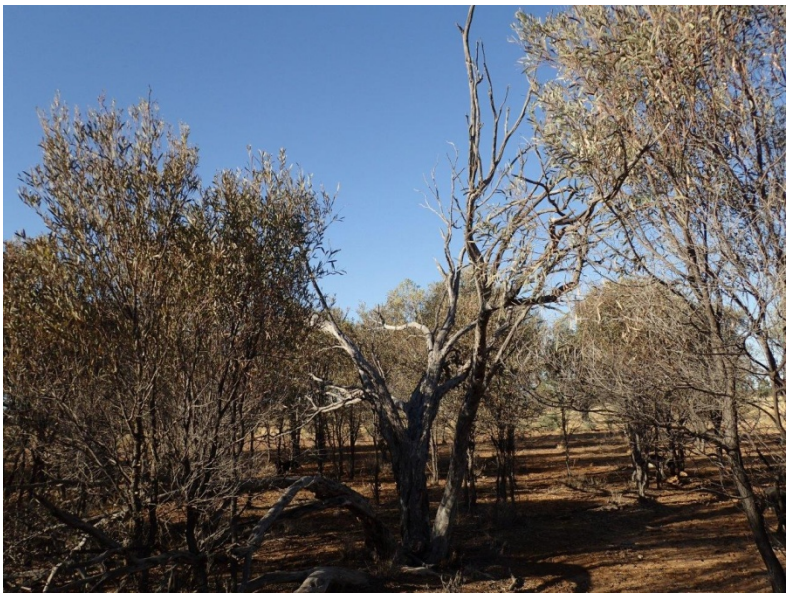
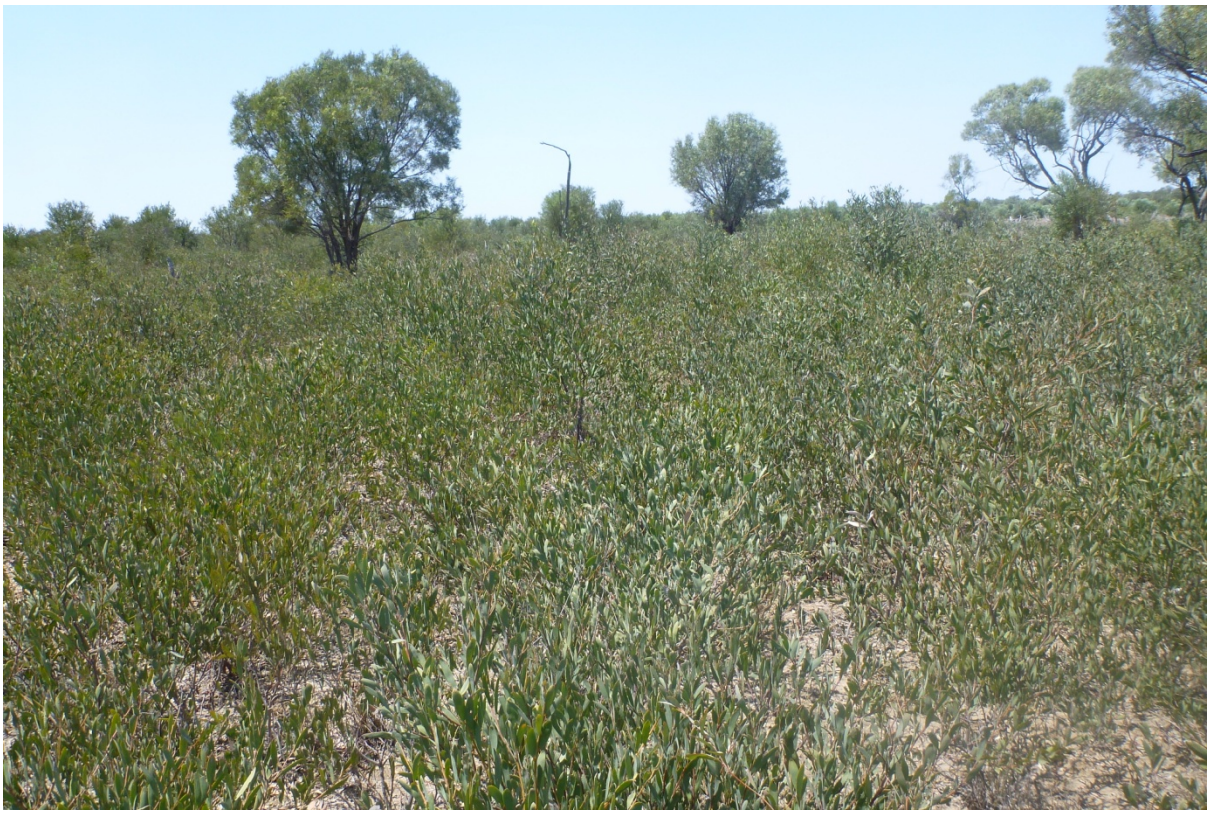
- Figure 4 Norwood Blackall 2016: Original tree source of seed

- 

- Figure 5 Norwood Blackall 2016: Note no biodiversity

- There is no understory of mixed vegetation only a monoculture. There is no grass. No trees have died and no natural thinning has occurred despite this thicket having been through two of the worst droughts in 100 years being the 2002-2004 drought and the current drought which is in its 5th year. Similar examples of invasive seedling outbreaks can be found across our landscape.



- Figure 6 Norwood Blackall 2012

- **These pictures demonstrate that there is no biodiversity (purpose (d) of the Act) and no maintenance of ecological process (purpose (e) of the Act) and that if left unmanaged or restricted severe environment effects eg loss of significant grasslands and subsequent soil degradation, will occur.**
- It is imperative that the vegetation management framework be as flexible as possible to restore the tree grass balance.
- This anecdotal case study is supported by a recent unpublished paper by Dr Bill Burrows entitled *Vegetation Management in Queensland - Some essential facts for politicians, rural industry and all Queenslanders* 2015
- Dr Burrows summarises:

- ➢ *Different satellite based sensors can now reliably detect changes in the aboveground biomass of vegetation, as well as carbon dioxide (CO_2) levels in the air column above the earth's land mass and oceans.*
- ➢ *Aboveground biomass increased in Queensland over a 20 year observation period (1993-2012), even though this also coincided with different years of either well below or well above average rainfall, along with years of extensive ('panic')*

clearing – in the highly publicised lead up to the passing of the State's Vegetation Management Act 1999.

- ➢ *The satellite sensor observations are validated by a myriad of ground based and aerial photo interpretation studies. This research confirms that uncleared woody vegetation is "thickening" (increasing in stem density, stem size/basal area and/or canopy cover) on the State's rural landholdings. This results in increased woody plant biomass and carbon storage, as well as providing strong competition that limits the growth of associated pasture.*
- ➢ *Independent sensors on Japan's IBUKI and NASA's OCO-2 satellites now both show Queensland is a net annual sink for CO_2. In other words vegetation is currently removing more CO_2 from the air (atmosphere) above this State than is being added to it from the combined impacts of land clearing, plant respiration, fire, fossil fuel use, adjacent ocean outgassing etc.*
- ➢ *It is concluded that arguments for the reintroduction of strict tree/shrub clearing control bans on this State's rural landholdings are not supported by the evidence. Our 'intact' woody vegetation is not static, but on a definite 'thickening' trend overall. This trend threatens the viability of many rural enterprises. Reintroducing strict restraints on the clearance of trees/shrubs from the rural landscape will only exacerbate this problem.*
- ➢ *A review of research literature provides further support for these conclusions. (2)*

- **Item 2 High Value regrowth**
- The re-inclusion of High Value Regrowth reverts to the unsupportable proposal that regrowth can be anything else but regrowth. It does not have high value and manifests itself on the ground as a monoculture. An examination of local mapping indicates that in general the proposed HVR areas are so small as to be meaningless in terms of the purported purposes of the act.
- The re-inclusion of High Value Regrowth (HVR) as an additional layer of regulation on leasehold, freehold and indigenous land is an overt grab by Queensland Government in search of targets for meeting international treaties such as the Kyoto Protocol and more recently the 2015 Paris Climate Deal. In 2009 when initially introduced, this HVR layer was prepared hastily in a 'desk-top' mapping exercise with associated errors including areas of non-native vegetation (such as orchards) and bare earth. In preliminary investigations of several properties it appears that the accuracy of the 2016 HVR is no better than that in 2009.

- **Item 3 Removal of High Value Agriculture**
- The removal of High Value Agriculture (HVA) and irrigated HVA (IHVA) affects farmers in regions differently, with those in the north particularly hard hit. Throughout northern Queensland energy and protein become limiting in cattle diets during the dry season and this can cause farmers issues with stock survival and welfare through years of drought. HVA and IHVA permits provide farmers in northern Queensland with the opportunity to grow fodder and grain for supplementing in the dry season and finishing off stock for market.
- The removal of HVA and IHVA is in direct conflict with the Australian Government White Paper on the Development of Northern Australia. A current example of this is $220 million being spent to upgrade roads to communities across Cape York, but Queensland State Government Vegetation Management Framework is preventing indigenous and non-indigenous land holders from developing agriculture projects.

- In central and southern Queensland, HVA and IHVA provides opportunity for farmers to drought-proof properties and stabilise production and income over variable climatic and market conditions. Sustainable clearing for relatively small pockets of high value agriculture enable agricultural production to improve continuity of supply to food processors and meet the increasing requirements of international markets and Australia's Free Trade Agreements.
- Indigenous development is particularly compromised by the re-inclusion of High Value Regrowth (HVR) as well as the stripping of the right to develop traditional lands as HVA or IHVA. For example, Indigenous landowners on the Gilbert River in northern Queensland preparing to submit IHVA applications have now been denied the possibility of stabilising beef production and employing community labour on their properties.

- **Item 4 Area Management Plans**

- At the time of their introduction Area Management Plans were seen as a new and creative solution to provide stability and certainty for areas that had similar vegetation issues. By removing the ability of individuals or non government groups eg Natural Resource Management Groups to develop AMPS there is a loss of the ability to garner local knowledge and practical solutions to problems. Also the shortening of the length of time of existing management plans has once again underlined the lack of trust and stability in vegetation management planning.

Footnotes

- **(1)**

Fensham, RJ., Fairfax, RJ. and Archer, SR. (2005). Rainfall, land use and woody vegetation cover change in semi-arid Australian savanna. Journal of Ecology: 93 , 596–606.

Fensham, RJ., Fairfax, RJ. and Ward, DP. (2009). Drought-induced tree death in savanna. Global Change Biology: 15. 380–387.

- **(2)**
- *Vegetation Management in Queensland - Some essential facts for politicians, rural industry and all Queenslanders*
- Dr Bill Burrows* FTSE 2015

Signed:	Christie C. Campbell Simon Campbell
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Date:	20th March 2018