THE WILDERNESS SOCIETY

Ending Queensland's Deforestation Crisis

Submission into the *Vegetation Management and Other Legislation Amendment Bill 2018* and related policies

March 2018

Executive Summary

The Wilderness Society is pleased to provide this submission to the Committee. In it we summarise why legislation is urgently needed to address Queensland's deforestation and land-clearing crisis. We also outline a series of suggested improvements to the *Vegetation Management and Other Legislation Bill 2018* and related policies that will enable these reforms to substantially address this pressing environmental problem.

Queensland is in the midst of an escalating deforestation and land clearing crisis, with a Gabba-sized area of forest and bushland destroyed every three minutes. This is killing tens of millions of native animals each year - one native animal a second - while harming the land, polluting rivers, damaging the Great Barrier Reef, and increasing greenhouse gas emissions. There is widespread community concern regarding the unsustainable levels of deforestation which are occurring across Queensland.

On the past three years of available data (2013-2016), about one million hectares of forest and bushland have been bulldozed in Queensland. This follows the pattern - despite a recent dip in the 2000's due to State Government reforms - of about 50 years of accelerated deforestation across Queensland. As example of the scale of destruction, in the "Brigalow Belt" in central and south-west Queensland, about 90% of the original forest has been bulldozed. This extremely high rate of deforestation places Australia among the worst global deforestation fronts - the only developed country to be listed as such. Clearly this is a practice that is outdated, unsustainable, and must stop.

The *Vegetation Management and Other Legislation Bill 2018* (the Bill) and related policies are designed to address this crisis, and to deliver on Labor's 2017 election commitments to "...drive down excessive clearing rates"[1] and "introduce legislation to protect remnant and high conservation value regrowth vegetation."[2]

The key policy test for the effectiveness of this Bill and related policies is whether they will rapidly and substantially bring down the present high rates of deforestation and protect environmentally important areas such as waterways and threatened species habitat.

The Bill and related policies as proposed are a good first step to meeting this test and achieving the Government's commitments but they will not protect all mature (remnant) and high conservation value regrowth, threatened species habitat, or sufficiently protect waterways and Great Barrier Reef catchments. Overall, it is unclear they will stop the large-scale destruction of forest and bushland. These shortcomings are due to the continuation of self-assessable codes and the failure to protect important forest and bushland currently exempt from regulatory controls as "Category X" including in Property Maps of Assessable Vegetation (PMAVs).

It is also critical that the promised $500 million Land Restoration Fund is established and operational as soon as possible to support landholders, lessees and native title holders enter into the emerging carbon economy. Protecting intact forests and bushland to reduce emissions, and re-planting new forests and woodlands to absorb carbon, is good public policy, in line with the Paris Climate Change Agreement. It is also an important opportunity to support diversification in regional economies.

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[1] Queensland Labor (2017) *Saving Habitat, Protecting Wildlife and Restoring Land: Ending broadscale tree clearing in Queensland.* p4.
[2] Queensland Labor (2017) *Saving Habitat, Protecting Wildlife and Restoring Land: Ending broadscale tree clearing in Queensland.* p4.

The Land Restoration Fund is a critical complementary policy to the Bill and should be supported by effective legislation establishing how the scheme will work and providing the bedrock for the long term operation of effective emissions reduction schemes from the "land sector". Queensland should and can become a leader in large-scale restoration and reafforestation instead of holding the unwanted title of a global leader in deforestation.

In order to drive down the present rates of deforestation, to close these loopholes, and to deliver on the Government's 2017 election commitments, we recommend the Committee adopt the following recommendations (in addition to the current amendments):

1. **Remove thinning / managed thickened vegetation as an allowable purpose**

2. **Remove self-assessable codes for fodder harvesting**

3. **Remove Area Management Plans**

4. **Expand "high value regrowth" definition in line with election commitment**

5. **Reclassify exempt "Category X" areas to allow full application of the law where mature (remnant) or high conservation value regrowth forest and bushland occurs**

6. **Discontinue "locking in" property maps - instead allow for periodic updates**

7. **Improve transparency around clearing applications and permits**

8. **Expedite establishment of Land Restoration Fund and related legislation**

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Who We Are

The Wilderness Society is an independent environmental advocacy organisation consisting of around 30,000 members and a further 270,000 supporters. The work we do leverages our strong base to build a mass movement for climate action and nature conservation in Australia. Since 1976, we've stood at the forefront of many of the country's most historic environmental campaigns, including the Franklin River, Fraser Island, Tasmanian Forests, James Price Point in the Kimberley, the Great Australian Bight and numerous World Heritage Areas. We have a long history advocating for an end to mass deforestation in Queensland and around the country. Our natural environment and the life it supports is Australia's great advantage; The Wilderness Society exists to work with the wider community to protect it.

Queensland's Deforestation Crisis

Queensland in the midst of an escalating deforestation and land clearing crisis. On the past three years of available data (2013-2016), about one million hectares of forest and bushland have been bulldozed. That's the equivalent of a Gabba-sized area of forest and bushland destroyed every three minutes.

This follows about a 50 year period of intense deforestation, concentrated in central and south-west Queensland, but also now recently expanding into the more intact regions of Cape York Peninsula and the Gulf of Carpentaria. This has been aided substantially by the advent of the highly destructive method of running a huge chain between two bulldozers to tear down trees en masse, alongside Government policy encouraging large-scale clearing. As an example of the scale of destruction, in the "Brigalow Belt" in central and south-west Queensland, about 90% of the original forest has been bulldozed.[3] Mass clearing is still occuring in this area despite this scale of loss.

While there was a clear dip in clearing rates in the 2000s due to tighter regulations, deforestation rates are once again soaring following the weakening of regulations from 2012 onwards. This is killing tens of millions of native animals each year—including the iconic koala—and is labelled the single greatest animal welfare crisis facing Queensland by the RSPCA.[4] Indeed, one native animal is killed every single second in Queensland due to deforestation and land clearing.

Deforestation and land clearing is also harming the land, polluting rivers and damaging the Great Barrier Reef. After declining over the last decade, carbon pollution from Queensland's deforestation and land clearing is once again skyrocketing. Queensland is the reason that Australia is on a list of global deforestation fronts - the only developed country on that list.[5]

This scale of damage runs completely contrary to many Queensland Government and Federal Government policies. Deforestation is increasing run-off to the Great Barrier Reef lagoon despite clear plans to improve its health including under the Reef 2050 Plan. Deforestation is increasing greenhouse gas emissions despite our national pledges to the Paris Climate Agreement. Deforestation is further harming the Murray-Darling Basin, creating salinity problems, and sending species towards extinction, despite a myriad of government programs designed to reverse these trends.

Over 90% of all clearing in Queensland is for livestock grazing, most of which is for cattle beef production. Yet international markets are moving quickly to shun beef sourced from such environmentally damaging practices. For example the China Meat Association recently signed the Chinese Sustainable Meat Declaration that commits to "...avoiding land degradation, deforestation and conversion of natural vegetation in the livestock production value feed chains"[6]. McDonalds is also working towards "...eliminating deforestation from our global supply chains".[7] These two players alone represent a large share of the global beef market, signalling a significant shift underway.

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[3] Seabrook, L., McAlpine, A., Maron, M. (2017). Can the Brigalow Belt Bounce Back? The Conversation. https://theconversation.com/ecocheck-can-the-brigalow-belt-bounce-back-57128
[4] WWF-Australia, RSPCA, 2017. *Tree-clearing: the hidden crisis of animal welfare in Queensland*. http://bit.ly/2w8MsXa
[5] WWF International, WWF International, Living Forests Report (2015) , Chapter 5: Saving Forests at Risk http://awsassets.panda.org/downloads/lfr_chapter_5_executive_summary_final.pdf
[6] https://www.beefcentral.com/news/chinas-sustainability-declaration-an-opportunity-for-farmers-says-wwf/
[7] http://corporate.mcdonalds.com/corpmcd/scale-for-good/our-planet/conserving-forests.html

There is simply no place for deforestation and excessive land clearing in a modern Queensland. It is an outdated, unsustainable, and unwarranted practice. Queensland should and can become a leader in large-scale restoration and reafforestation and sustainable agricultural practices instead of holding the unwanted title of a global leader in deforestation.

The Government's 2017 Election Policy Platform

In response to this crisis, at the 2017 Queensland state election the State Government outlined a series of policy commitments to address these issues:

- "Introduce legislation to protect remnant and high conservation value regrowth vegetation."[8]
- "...drive down excessive clearing rates."[9]
- "Where necessary [self-assessable codes] will be amended in line with relevant scientific literature and advice from the Queensland Herbarium. This will ensure that the codes are only being applied to clearing that presents a low ecological risk."[10]
- "Continue to update and improve the mapping of protected vegetation … and ensure that mapping for the purposes of vegetation management is based on the regional ecosystem mapping managed by the Queensland Herbarium."[11]
- "High conservation value will be defined consistently with the international definition advocated by the High Conservation Resource Network, including (but not limited to) endangered vegetation species and communities, vegetation in Reef catchments, riparian areas, threatened species habitat and areas where landscape integrity is at risk."[12]
- "Establish a flagship $500 million Land Restoration Fund to directly support Queensland based land sector carbon projects and create new jobs and opportunities in this growing industry."[13]

The key tests of effective delivery on these commitments via the Bill are therefore:

- Will it bring down the high rates of deforestation in Queensland?
- Will it protect the oldest and environmentally most important forest and bushland (remnant and high conservation value regrowth forest and bushland)?
- Will it protect the habitat of threatened native plants and animals?
- Will it protect our waterways and substantially reduce run off into the lagoon of the Great Barrier Reef?

Positive Reforms From Bill and Related Policies

According to the explanatory notes for the Bill, it aims to:

> "...protect remnant and high conservation value non-remnant vegetation; amend the accepted

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[8] Queensland Labor (2017) *Saving Habitat, Protecting Wildlife and Restoring Land: Ending broadscale tree clearing in Queensland.* p4.

[9] Queensland Labor (2017) *Saving Habitat, Protecting Wildlife and Restoring Land: Ending broadscale tree clearing in Queensland.* p4.

[10] Queensland Labor (2017) *Saving Habitat, Protecting Wildlife and Restoring Land: Ending broadscale tree clearing in Queensland.* p11.

[11] Queensland Labor (2017) *Saving Habitat, Protecting Wildlife and Restoring Land: Ending broadscale tree clearing in Queensland.* p11.

[12] Queensland Labor (2017) *Saving Habitat, Protecting Wildlife and Restoring Land: Ending broadscale tree clearing in Queensland.* p.10.

[13] Queensland Labor (2017) *Saving Habitat, Protecting Wildlife and Restoring Land: Ending broadscale tree clearing in Queensland.* p.4.

development vegetation clearing codes to ensure they are providing appropriate protections based on Queensland Herbarium advice; and align the definition of high value regrowth vegetation with the international definition of High Conservation Value."

The positive reforms that have been made in the Bill and related policies to achieve these and State Government's 2017 election policy platform are:

- Removing "high value agriculture" as a relevant purpose;
- Removing "thinning" as a mandatory self-assessable code for clearing remnant forest and bushland;
- Extending the definition of "high value regrowth" to encompass regrowing forest and bushland of 15 years old and cover a 50 metre protection buffer around watercourses in Great Barrier Reef catchments;
- Introducing modest changes to the Fodder Harvesting Code to reduce the types of vegetation that can be cleared and some restrictions on when bulldozed forest can be recleared;
- Removing provisions for the creation of new developer-driven "Area Management Plans" and the substantial clearing allowed under these; and
- Bolstering enforcement provisions, including raising penalties in line with other land and water management legislation.

Will the Proposed Reforms Work?

While the proposed reforms in the Bill and related policies are welcome changes, in the context of the scale of deforestation occurring each year in Queensland, they fall short on delivering on the Government's 2017 election policy platform.

On the key tests outlined above:

- **Will it bring down the high rates of deforestation in Queensland?**
  Unclear. It is not clear to what extent the reforms will drive down the rate of large-scale destruction of forest and bushland. Partially this is because there is not publically available data on the amount of clearing that will continue to occur under self-assessable codes (including Area Management Plans that will continue to run) and other exemptions. However, Queensland Government data shows that 60% of all clearing from 2013-16 was within "Category X" exempt areas (see Appendix 2 on data summary), which indicates that high rates of deforestation are likely to remain even with the Government's proposed reforms

- **Will it protect the oldest and environmentally most important forest and bushland (remnant and high conservation value regrowth forest and bushland)?**
  Partly. While there is a high degree of uncertainty in the data, we estimate these measures will address approximately 40-60% of clearing of remnant forest and bushland across the state (estimate based on past three year of available data, with the variation depending on how much thinning contributes overall to this clearing and how much can therefore be reduced - see Appendix 2 on data summary).

- **Will it protect the habitat of threatened native animals?**
  Partly. The protection of threatened species habitat is currently largely via the protection of

remnant and high conservation value regrowth - which is limited by the remaining loopholes in the legislative framework (see next section). "Essential habitat" for threatened species is also afforded protection, but it is unclear what protection is afforded for other forms of habitat under the ongoing self-assessable codes. In addition, there are many areas exempt from protection altogether ("Category X" in PMAVs). Threatened species habitat has not been explicitly included in the redefinition of high conservation value regrowth.

● **Will it protect our waterways and substantially reduce run off into the lagoon of the Great Barrier Reef?**
   Partly. While there is a buffer of 50 metres in Reef catchments, these are small in the context of the amount of clearing that will continue to occur under exemptions ("Category X" in PMAVs) in these catchment areas. There is also no protection buffer for waterways, lakes and springs outside of Reef catchments, despite an explicit election commitment to protect riparian areas.

The major problem lies in the continuation of self-assessable codes and the failure to protect important forest and bushland currently exempt from regulatory controls as "Category X" in Property Maps of Assessable Vegetation (PMAVs). The definition of "high conservation value" also does not align with the Government's 2017 election platform - it is not yet expansive enough.

Together these act as significant loopholes that will continue to allow mass deforestation of remnant and high conservation value regrowth forest and bushland across the state in perpetuity. This is not sustainable either environmentally, or in respect to good land management principles.

It is also critical that the promised $500 million Land Restoration Fund is established and operational as soon as possible to support landholders, lessees and native title holders enter into the emerging carbon economy. Protecting intact forests and bushland to reduce emissions, and re-planting new forests and woodlands to absorb carbon, is both good public policy in line with the Paris Climate Change Agreement and an important opportunity to support diversification in regional economies.

The Land Restoration Fund is an important complementary policy to the Bill and should be supported by effective legislation establishing how the scheme will work and providing the bedrock for the long term operation of effective emissions reduction schemes from the "land sector".

Changes Required to Address the Deforestation Crisis

In order to close these loopholes and deliver on the Government's 2017 election policy platform and the stated aims of the Bill, we recommend the Committee adopt the following recommendations

1. **Remove thinning / managed thickened vegetation as an allowable purpose**
   Thinning is the practice of bulldozing and removing trees under the false pretext of improving the environmental condition of forest and bushland (see Appendix 1 for an example). Dense thickets of trees, whether caused by interventionist human management practices or not, are found by empirical studies to be more beneficial for biodiversity than "thinned" forests, and thinning them is harmful.[14] If there were any genuine thickening of forest and bushland as a

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[14] Thompson, W.A. and Eldridge, D.J. (2005). Plant cover and composition in relation to density of *Callitris glaucophylla* (white cypress pine) along a rainfall gradient in eastern Australia. *Australian Journal of Botany*, 53(6), pp.545-554. And Reside, A., Cosgrove, A., Silcock, J.,

result of past grazing and fire mismanagement, the only legitimate solution is to improve the management, not bulldoze forests into pastures with scattered trees.

While the self-assessable code for this form of deforestation has been removed for clearing remnant forest and bushland, thinning remains under several pathways: 1) development approvals to thin remnant forest and bushland; 2) self-assessable clearing codes for high conservation value regrowth ("Category C" and "Category R"); and 3) existing Area Management Plans where a thinning notification has been made.

Given the scientific rationale behind this practice is highly questionable and there has been severe misuse of thinning codes over the past few years, it should be removed as an acceptable purpose in the Bill altogether. At the very least, any so-called thinning should have to undergo a full and extensive development approval, including for clearing in Category C and Category R. This is consistent with the election commitment that codes will only occur where there is "low ecological risk" - thinning is in fact high risk.

Without such changes, there will likely continue to be large areas of high conservation value regrowth forest and bushland cleared under the guise of these codes.

2. **Remove self-assessable codes for fodder harvesting**
    Fodder harvesting is the practice of bulldozing trees to provide feed for cattle, happening at large scale mostly in south-west Queensland (see Appendix 1 for an example). What began as a process of lopping branches to feed cattle in times of drought, has transformed in many cases into large-scale forest bulldozing operations, unconstrained by requirements to demonstrate the necessity of such clearing, including for drought purposes.

    While the changes to the fodder harvesting code remove the ability to clear "endangered" ecosystems (where less than 10% of the original ecosystem remains) and put some constraints around the timing of the re-clearing of forest, this simply does not go far enough to control this destructive practice.

    Fodder harvesting should only be permitted if it strictly tied to feeding cattle in times of drought or other clear necessity and only done via lopping of individual branches. Consistent with the election commitment that codes will only occur where there is "low ecological risk", the self-assessable code should be removed, with the above constraints written into the Bill. At the very least, fodder harvesting should not occur in "of concern" ecosystems (where only 10-30% of the original ecosystem remains), should require a drought declaration in place, and should be proven to have low ecological impact.

3. **Remove Area Management Plans**
    Area Management Plans have been used as a tool to apply self-assessable bulldozing at the property, local government and regional scale. Through this large areas have been subject to wholesale clearing under the guise of thinning or other false pretexts.

    While the Bill removes the capacity for developers to request a plan over their (and other)

Seabrock, L., Evans, M.. (2017).Land clearing on the rise as legal 'thinning' proves far from clear cut. The Conversation. https://theconversation.com/land-clearing-on-the-rise-as-legal-thinning-proves-far-from-clear-cut-79419

properties - a welcome change - it still retains discretionary power for the Chief Executive to make new plans, allowing further self-assessable loopholes. Prior to 2009 the *Vegetation Management Act 1999* operated without this type of provision and could therefore do so again, closing off the capacity for the Chief Executive to permit mass deforestation via a backdoor. At the very least, provisions should be strictly tightened within the Bill to carefully constrain the power of the Chief Executive to introduce any measures that resemble bulldozing of native forest and bushland. Consistent with the election commitment, if any self-assessed clearing does continue under Area Management Plans it must be demonstrated to be "low ecological risk."

4. **Expand "high value regrowth" definition in line with election policy platform**
    The Government's 2017 election policy platform was very clear that the definition of "high conservation value regrowth" would be based on the international definition advocated by the High Conservation Value Resource Network, "including (but not limited to) endangered vegetation species and communities, vegetation in Reef catchments, riparian areas, threatened species habitat and areas where landscape integrity is at risk". However the definition is currently only limited to a small 50 metre watercourse buffer in Great Barrier Reef catchments and regrowing forest and bushland 15 years old. In order to fully meet the election commitment, this definition should be extended to include:

    ● All watercourses, wetlands, lakes and springs, not just Reef catchments, and with an expanded 100 metre buffer.
    ● All rare, at risk, of concern, threatened or endangered ecosystems.
    ● All threatened species habitat - not simply a radius of protection where species have been sighted. This includes habitat necessary for the recovery of threatened species.
    ● All landscapes at risk - slopes above 10%, fragile and erodible soils, high risk salinity areas.

5. **Reclassify exempt "Category X" areas to allow full application of the law where mature (remnant) or high conservation value regrowth forest and bushland occurs**
    There is a staggering 23 million hectares of land covered by a "Category X" exemptions in PMAVs across the state. This means developers can continue to clear these areas, no matter the value of the forest and bushland. In December 2013, the legislative framework for the Vegetation Management Act 1999 was amended. The changes lead to the removal of restrictions of clearing "high value regrowth", or Category C, on freehold tenures. Therefore, the area of regrown remnant and high conservation value regrowth forest and bushland within these exempted areas is unknown, but very likely to be significant - up to 30% according to some analysis.[15]

    We understand that high conservation value regrowth - as newly defined - of non-PMAV "Category X" has been mapped which is positive. However, there are two limitations to this re-assessment: (1) the promised redefinition of high conservation value regrowth includes multiple factors that have not yet been mapped, including riparian areas and threatened species habitat; and (2) regrown remnant and high conservation value regrowth have not been mapped in PMAVs.

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[15] WWF-Australia (2018). *Bushland destruction in Queensland since laws axed.*
http://www.wwf.org.au/knowledge-centre/resource-library#gs.U1C0m7M

These important areas of forest and bushland must be fully protected in the Bill to deliver on the 2017 election commitments. Mapping of these areas must be produced as a matter of priority for the protections to take full effect. Failure to act on this significant source of clearing will be a major obstacle to the Queensland Government meeting its policy objectives.

The mapping of the condition and age class of forest and bushland within "Category X" in PMAVs will also be critical to enable the successful operation of the Land Restoration Fund. The fund seeks to protect and restore carbon rich forest and bushland and provide an additional income stream to landholders and lessees. This needs to capture areas not covered by regulation. The targeting of the fund will be very difficult without this detailed knowledge.

6. **Discontinue "locking in" property maps - instead allow for periodic updates**
The above problem with "Category X" exemptions in PMAVs arises from an inflexible, outdated and inappropriate policy of "locking in" areas of exemption at the request of a developer. This means that as forest and bushland recovers from degradation to a remnant or high conservation value regrowth status, it can still be bulldozed.

This process of "locking in" PMAVs should be replaced with a mandatory annual revision of all maps to incorporate improved mapping and regrown and recovered forest and bushland.

7. **Improve transparency around clearing applications and permits**
Despite the Queensland Government's excellent mapping, compliance and GIS capabilities, the transparency around clearing permits and spatial locations is poor and there is nothing in the Bill or associated policies to improve this. A consolidated central database should be maintained for public viewing, showing the precise location (polygons on maps) of all forests and bushland subject to clearing applications and permits. As a model, the Western Australian Government maintains such a database.[16]

8. **Expedite establishment of Land Restoration Fund and related legislation**
The $500 million Land Restoration Fund is an excellent initiative and should be considered as necessary complementary policy to the Bill and required changes outlined above. Landholders, local communities, lessees and native title holders should be supported to protect and restore carbon rich and biologically important forest and bushland and should be provided the opportunity to engage in income diversification activities through the emerging land sector.

To be effective, the fund must ensure that carbon, biodiversity, social and cultural priorities are maximised, including ensuring that the benefits flow to local communities (including local employment via on ground management activities). Long term, the aims and objectives of the fund will not be met if benefits are not realised at the local community level. The emerging land sector places a high premium on on-ground management of carbon stores, monitoring of emissions reduction outcomes and verification of achievement of emissions reductions as part of monetising the storing of carbon. These should provide enormous opportunities for local community engagement and employment and should be enshrined as key policy

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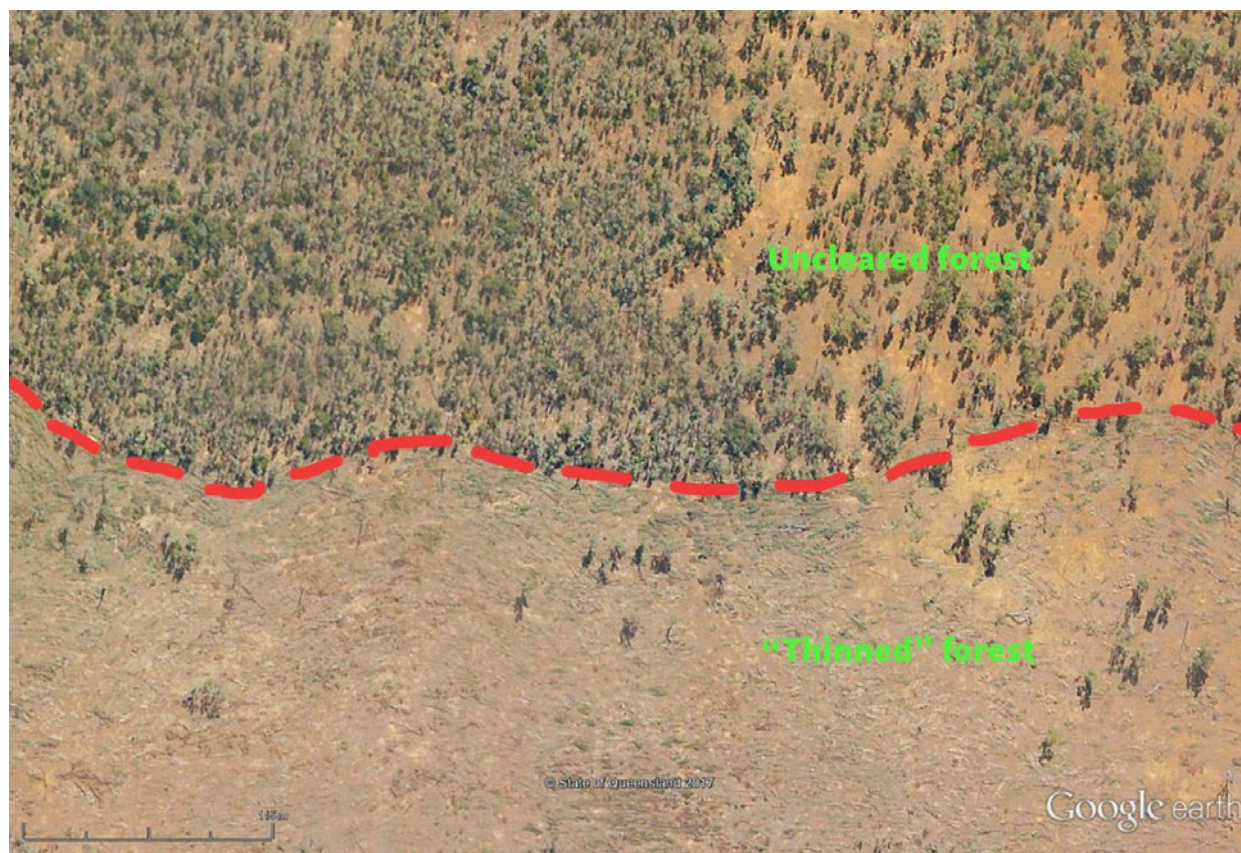[16] https://www.der.wa.gov.au/our-work/clearing-permits

outcomes of the fund.

The fund should be expedited as a matter of high priority, including any necessary legislative reform to support its operation.

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Appendix 1 - Examples of Thinning and Fodder Harvesting

"Thinning"

From WWF-Australia. Google satellite image of a property near Alpha in central Queensland during clearing of remnant ironbark forest under the former self-assessable code for thinning. The top half shows intact forest, and the lower half "thinned" forest. The top half and indeed, the entire property has since been entirely cleared over an area in excess of 6,500 hectares. No permit was required to bulldoze this mature, remnant forest. Under previous codes only 30-250 immature stems per hectare needed to be retained.

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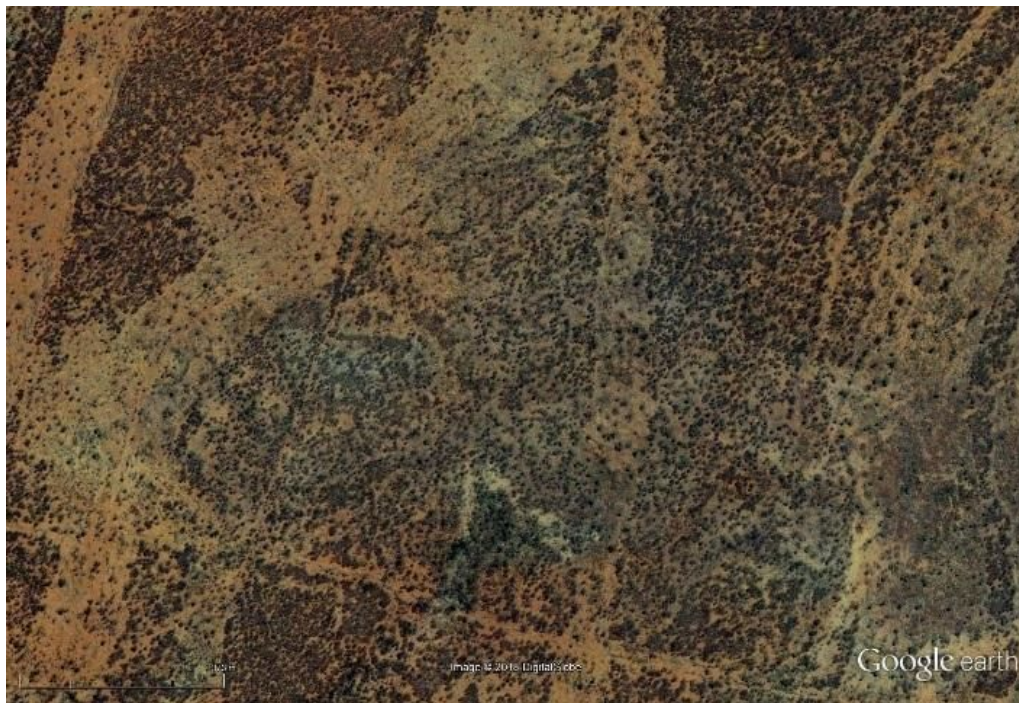
"Fodder Harvesting"

From WWF-Australia. Google satellite images of a property near Charleville in south west Queensland before and after clearing of remnant mulga forest under the "fodder harvest" self-assessed Accepted Development Code in 2015-16. Clearing is shown in progress. The intact patches at the top were later also bulldozed.

Appendix 2 - Summary of Relevant Data

Queensland Government Data

The Queensland Government clearing data ("SLATS") from 2013-16 shows that:

- There was a total of approximately 987,000 hectares of forest and bushland cleared - approximately 355,000 hectares of which was remnant vegetation. (It is unclear how much of the remaining was high conservation value regrowth vs non high conservation value regrowth as this mapping it not yet available - see below).
- Of the total remnant vegetation cleared, approximately 35,629 hectares was under high value agriculture permits.[17] Put another way, only 10% of clearing of remnant vegetation during this period was for the high value agriculture category.
- Approximately 60,000 hectares of remnant vegetation was cleared in a manner described in SLATS as "thinning". That is, approximately 17% of remnant vegetation was "thinned".
- Our preliminary analysis of Self Assessable Code notifications and mapping of clearing that has taken place since the last SLATS indicates an alarming increase in the amount of remnant clearing occurring under thinning and other Self Assessable Codes. For example, in 2015-16, thinning accounted for 24% of all remnant vegetation clearing.
- There is neither Qld Government nor Qld Herbarium data available on the proportion of clearing undertaken for fodder and other purposes that explain the remaining proportion of clearing of vegetation not officially described as thinning or occurring in areas of high value agriculture permits. However, we understand a significant amount of this is due to thinning, fodder harvesting and clearing in "Category X". Indeed there is currently 23 million hectares of land in Queensland covered by a "Category X" exemption.
- Analysis of SLATS data therefore shows that we can only officially account for approximately 27% of remnant clearing over the last 3 years under the high value agriculture and thinning purposes. Therefore there is a significant amount of remnant clearing that is not explained by high value agriculture or thinning by official Qld Government data.
- There is an urgent need for the Qld Government's data to fully account for the remainder of remnant clearing and properly map regrown remnant and high conservation value regrowth within all "Category X" areas. This evidence will be essential to fully meeting the Qld Government's commitment to legislate to protect remnant and high conservation value regrowth vegetation.

Independent Data Analysis by Dr Martin Taylor (WWF-Australia)

An additional independent analysis by Dr Martin Taylor from WWF-Australia[18] attempts to fill in some of the gaps identified above and indicates that:

- 468,000 hectares of remnant forest and bushland was cleared over the 2013-16 period - well over the 355,000 hectares as recognised by the Qld Government. This is because the

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[17] Calculated from additional GIS analysis from The Wilderness Society.
[18] WWF-Australia (2018). *Bushland destruction in Queensland since laws axed.*

remainder had regrown to "remnant" status in "Category X" areas but had not been officially recognised.

- Of this 468,000 hectares of remnant forest and bushland clearing, 48% was via "self-assessable" codes where loopholes exist that permit large-scale clearing. 31% was in exempt "Category X" areas (the remainder is "high value agriculture" and clearing not on the public register).
- In total 67% of forest and bushland in "Category X" areas is either regrown remnant or in an advanced regrowing stage and could possibly be categorised as high conservation value. That's over 15 million hectares of important forest and bushland.
- 63% of *all* clearing of forest and bushland, regardless of age and status, was within "Category X" areas.