The Committee Secretary
State Development, Natural Resources and Agricultural Industry Development Committee
sdnraidc@parliament.qld.gov.au

22 March, 2018

Dear Committee,

RE: Submission to the Vegetation Management and Other Legislation Amendment Bill 2018 Parliamentary Inquiry

It is well established that and clearing rates in Queensland have increased dramatically over the past five years, in particular after the changes in vegetation laws under the Newman government in 2013[1].

I understand the proposed Bill would achieve the following key changes, and we provide brief comments on each:

Removal of 'High-Value Agriculture' as an allowable purpose for broadscale clearing of remnant vegetation.

Comment: This is a crucial component of the bill. Genuine high-value agricultural land has long since already been cleared in Queensland[2,3]. There is clear evidence that remaining remnant vegetation is of very high value as habitat for wildlife[1,4], including many species listed as Endangered in Queensland and threatened nationally[5], and provides myriad other services for people, such as carbon sequestration and storage, sediment retention and water quality and flow regulation[1,6].

Changes to the Self-Assessable Codes to restrict the circumstances under which self-assessed 'thinning' and other clearing is allowed.

Comment: Analysis of ground-truthed satellite imagery shows that a large proportion of vegetation clearing occurring from 2013-2016 has been done under self-assessable codes[7,8]. This makes it clear that this change is essential in reducing overall rates of land clearing. It is important that thinning is only permitted in circumstances in which the impacts of thinning on environmental values of the affected ecosystem are minimal. Ecological thinning, a process used in some very specific situations to improve vegetation condition (e.g. removal of individual stems by hand[9]), is a very different exercise to the 'thinning' that has been recently recorded to occur in Queensland under these codes,

which is ecologically damaging. If thinning is allowed in future, it should only be permitted in places where it can be demonstrated that substantial vegetation thickening has occurred, and only where thickening threatens the ecological functioning and biodiversity of the Regional Ecosystem at that locality[10].

Protections of high-conservation value regrowth older than 15 years and along streams in all GBR catchments

Comment: For many extensively cleared ecosystems, the only way they can return to a non-threatened status is by allowing regrowth to mature to an age at which their condition approaches that of remnant. Therefore, older regrowth of such ecosystems needs protection to achieve this. Native vegetation, both remnant and regrowth, plays a vital role in stabilising streambanks and controlling sediment inputs to the Great Barrier Reef, thus it is important that it is protected[1]. However, it is not clear yet whether new self-assessable codes contained in the Bill will allow for additional clearing of this important habitat. We recommend amending this to clearly provide the protection of high-conservation value regrowth.

Expansion of exemptions, and approaches to 'lock in' new exemptions, from the new regulations for high-value regrowth, but no ability to reverse existing exemptions where they allow for further destruction of threatened ecosystems and threatened species habitat.

Comment: A large proportion of existing clearing is done under exemptions[7]. It is likely that a portion of the vegetation currently under exemptions are critical habitats for endangered wildlife and/or and provides myriad other services for people, such as carbon sequestration and storage, sediment retention and water quality and flow. It seems sensible that all exceptions be reviewed and assessed against their current environmental value before they are locked in (especially considering the impact of the enormous rates of land clearing that have occurred in the previous decade).

In summary, the new Bill contains provisions that appear likely to reduce the damage currently accumulating to Queensland's biodiversity, inland and coastal waterways, soils and climate. However, there remain elements that, if not carefully managed, will permit ongoing losses of critically important habitats and vegetation.

Thank you for considering my submission.

Shayan Barmand

References

1 Reside, A. E. *et al.* Ecological consequences of land clearing and policy reform in Queensland. *Pacific Conservation Biology* **23**, 219-230 (2017).

2 Lindenmayer, D. B., Bennett, A. F. & Hobbs, R. J. An overview of the ecology, management and conservation of Australia's temperate woodlands. *Ecological Management & Restoration* **11**, 201-209 (2010).

3 Watson, D. M. A productivity-based explanation for woodland bird declines: poorer soils yield less food. *Emu* **111**, 10-18 (2011).

4 WWF. Accelerating bushland destruction in Queensland: clearing under Self Assessable Codes takes major leap upward. (WWF-Australia, http://www.wwf.org.au/ArticleDocuments/360/pub-accelerating-bushland-destruction-in-queensland-21mar17.pdf.aspx?Embed=Y, 2017).

5 Black-throated Finch Recovery Team. Submission #2008 - Mio College Vegetation Clearing for High Value Agriculture, Barratta Road, Clare QLD. (Submission to the Department of the Environment and Energy, Canberra, 2017).

6 Bunn, S. E., Abal, E. G., Greenfield, P. F. & Tarte, D. M. Making the connection between healthy waterways and healthy catchments: South East Queensland, Australia. *Water Science & Technology: Water Supply* **7**, 93-100 (2007).

7 Taylor, M. Bushland destruction in Queensland since laws axed. (WWF-Australia Briefing, Brisbane, Queensland, 2018).

8 Reside, A. E., Cosgrove, A. J., Silcock, J. L., Seabrook, L. & Evans, M. C. 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 (2017).

9 Dwyer, J. M., Fensham, R. & Buckley, Y. M. Restoration thinning accelerates structural development and carbon sequestration in an endangered Australian ecosystem. *Journal of Applied Ecology* **47**, 681-691, doi:10.1111/j.1365-2664.2010.01775.x (2010).

10 Butler, D. W., Neldner, V. J., Eyre, T. J. & Guymer, G. P. Science supporting revision of codes for self-assessed vegetation thinning and fodder harvesting in Queensland: a summary for peer review. (Department of Environment and Science, Queensland Government, Brisbane, Queensland., 2018).