

In response to the Vegetation Management and Other Legislation Amendment Bill 2018 ("the Bill"), I submit to you our submission opposing the changes proposed. We submit to you that the changes are unjustified and the Vegetation Management Act should remain unchanged.

It is our deep concern that the introduction of this **19<sup>th</sup> amendment to the Vegetation Management Act since 1999** will have long-term negative impacts to the economic prosperity and sustainability of the Agricultural industry and therefore of the state. It will not achieve good environmental outcomes for the state as suggested but will lead to land degradation due to restricted vegetation management. We are also concerned of the repercussions this will have on the mental health of producers already entrenched in time-consuming legislation and strain from natural disasters such as the prolonged drought currently affecting a large portion of Queensland. The Bill does not uphold the governments' responsibility to protect the well-being of all its' citizens and the physical environment.

The key provisions of the legislation we refer to are as follows:

### **1. Removing High Value Agriculture and Irrigated High Value Agriculture from the Vegetation Management Framework**

1. The removal of High Value Agriculture (HVA) and irrigated HVA (IHVA) put Queensland at risk of losing its economic benefit as the number one agricultural state in Australia ( Source: Australian Bureau of Agricultural and Resource Economics and Sciences). For Queensland to remain economically strong, the Agricultural sector requires government to support farmers through an on-the-ground manageable vegetation framework.

2. In Queensland, Resources & Mining (predominately Gas and Coal) industries are encroaching on long established High value Agriculture areas such as the Lockyer valley. For the future economic wellbeing of our state, new areas of HVA and IHVA need to be developed as a replacement for land perpetually damaged through mining practices.

3. Farmers particularly in the Northern regions will be negatively impacted in the event HVA and IHVA were removed. The land is predominately used for beef production however during the dry season protein and energy become limited in the native pasture. Producers must supplement the cattle throughout the year in order adequately address animal welfare standards and stock survival. HVA and IHVA permits have provided northern producers with the option of growing grain and fodder crops for the purpose of meeting the nutritional needs of their livestock and conditioning the cattle for market, thus contributing to the economic prosperity of Queensland.

4. Removal of HVA and IHVA in key areas such as in the Northern regions will limit producers' ability to drought proof their properties for the future. In an ever- increasing population nationwide and globally, food and fibre hold an invaluable foothold in our nation's ability to remain competitive in a global market.

5. Australia has one of the highest food safety standards worldwide, however the removal of HVA and IHVA will restrict the potential development of new food producing areas to meet growing demand for high quality food production.

## 2. Retaining Self-Assessable Codes

6. Self-assessable codes streamline an unnecessarily difficult process so farmers can effectively and sustainably manage their land. Routine vegetation management promotes healthy ecosystems and the avoidance of soil erosion due to loss of grass and soil cover from thickening timber. The proposal that land holders will require to lodge a Development Application is costly and a waste of tax payer funds.

7. The current self- assessable codes are already rigorously monitored every 16 days via satellite and the vast majority of farmers are keeping within the code regulations. In the 2016/17 period only three cases of illegal clearing were recorded (Source: Brisbane Times, 23 January, 2018.)

8. The code already requires landholders to do continual tree counts to ensure thinning is carried out according to regulation, and more than adequately compensates for any vegetation loss from fire or drought etc. It needs to be understood that we are dealing with productive agricultural land – not a hobby farm so the codes need to be practical and feasible to apply in a larger area. Already thinning is much more costly than other forms of clearing, and requires much more understanding and skill to apply.

9. The introduction of a one-size-fits-all code for the state which replaces the previous 5 code specific to groups of bioregions is clearly a backward step economically and environmentally. These codes were introduced to create the best outcome for the environment and for the particular issues faced by farmers in that region i.e. vegetation areas that regenerate quickly and sustainably need to be managed quite differently from slow growing sparsely populated vegetation area.

For example, on our property thickening of ironbark etc. is a continual problem which, if left unmanaged, will significantly influence our future sustainably, the welfare of our livestock, and the health of the ecosystem. It also creates a work place health and safety issue for us with employees mustering etc.

10. The Self assessable code has been a valuable tool for us to more effectively manage our land sustainably. We have observed a fairly quick turnaround in the health of both the ecosystems and the health and welfare of our cattle. Despite lower than average rainfall the productive value of our land has increased significantly and cattle held their condition for longer and required less supplementation to meet their nutritional needs. Wild life such as kangaroos, emus, other native birds and dingoes also have thrived from the application of the self- assessable codes due to the thickening of grass cover etc.

11. The codes allow the people on the ground i.e. the farmers, to make better “real -life” decisions on what needs to be done to manage thickening vegetation and encroachment etc. Currently, farmers are faced with the reality that vegetation is thickening rapidly, while the vegetation management data the Queensland Government has indicates only vegetation clearing rates. It is the responsibility of our government to legislate laws that fairly protect the rights of its citizens – this can only be done through complete data.

12. In the event that self- assessable codes were removed and we were required to undertake a development assessment and approval to do the same activity we would most certainly be taking several steps backwards. Managing thickening vegetation is costly, and the extra expense in time and money to provide additional information may not be sustainable. The ever-increasing workload of trying to meet all the continual new amendments from every department we deal with in our industry is ridiculous. Many producers already do over 70 hours per week therefore to be given more paperwork simply is not achievable without impacting negatively on their health, family etc. For us to be economically sustainable we already have to manage our land sustainably, and if this right is taken away or made even more difficult it will certainly impact on our ability to remain sustainable financially, emotionally and environmentally.



### **3. Including High Value Regrowth as an additional layer of regulation under the Vegetation Management Framework on leasehold, freehold and indigenous land**

13. The reintroduction of legislative protections of high value regrowth (HVA) vegetation is clearly politically driven and unnecessary. The HVR layer has already been proved to have been prepared hastily in a 'desk-top' mapping exercise in 2009 with associated errors including areas of non-native vegetation (such as orchards) and bare earth. Amendments to the Act in 2013 removed legislative protections for regrowth on freehold and indigenous land.

14. The proposal in this Bill to re-define HVR to mean *“native woody vegetation that has not been cleared for 15 years, and forms an Endangered, Of Concern or Least Concern regional ecosystem; and further amending the definition to include high value regrowth vegetation on freehold land, Indigenous land, and land which is the subject of an occupation licence under the Land Act 1994.”*, is a serious breach of the responsibility of the Government to protect the rights of its citizens. There are many reasons why the landholder may not of cleared the land in that time frame due to, but not limited to: change of ownership, drought conditions, exceptional family circumstances etc. which may cause the lack of finances and time the owner has available to complete the management of the given area.

15. Freehold and Indigenous land should be given exemption from such regulation as re-inclusion renders their purpose useless at a very high financial loss to those who paid significantly high fees for protection under these titles.

16. HVA should remain defined as *“native woody vegetation that has not been cleared since 31 December 1989, and forms an endangered, of concern or least concern regional ecosystem”*.

17. The introduction of these new amendments will not provide good environmental outcomes, but harm through soil erosion and loss of wildlife from unmanaged vegetation and land. Thickening vegetation and encroachment causes loss of grass cover, which has been proven to result in land degradation. Livestock and wild-life relying on good grass cover and water provided through good management of farmers will be the first to suffer as a result. It will also cause unnecessary economic losses in the agricultural industry and for the state.

### **4. That no compensation will be payable to landholders subject to added layers of regulation – high value regrowth, regrowth watercourses and essential habitat during transitional arrangements**

18. The amendment that no compensation will be payable to landholder subject to added layers of regulation could arguably be defined as 'theft'. For a landholder to purchase a property under the understanding they will be able to manage it for the production of food and fibre, and then having the right to do it taken away is equivalent to purchasing a product without receiving the goods. It is the governments' responsibility to ensure that any changes they make that will affect the wellbeing of the citizens they represent should be entirely compensated for.

## 5. Increasing compliance measures and penalties under vegetation management laws.

19. The introduction of keeping all specified data in each code and making them available to DNRME upon request is unnecessary and places unfair workload on already strained landholders. The DNRME can already monitor land use changes and this legislation will not protect the environment as its proposed to do.

20. The intention to triple penalties is unfair and completely unjustified, and potentially breaches fundamental legislative principles (FLPs) as outlined in section 4 of the Legislative Standards Act 1992.

21. The vast majority of farmers are doing their best to follow the already difficult and very time consuming vegetation legislation. *This Bill will be the 19th time that the vegetation management framework has been amended since the introduction of the Vegetation Management Act 1999.* Increasing penalties will only discourage landholders from managing their land for the environmental and economic benefit of the state, and the nation.

22. The penalties for breaching the Vegetation Management Act are higher than penalties given for the detrimental harm of people such in cases of murder and rape. Where is the moral fairness in this? How can vegetation be treated more valuable than a human life?

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

23. In 2015/16 just 0.23% of Queensland's land area was cleared according to SLATS 20/15/16 report, page 21. Two thirds of clearing occurring in Qld is to manage areas previously cleared and to carry out routine vegetation management practises such as removal of high value timber for furniture and housing; thinning to promote natural grass cover; for firebreaks and access tracks; control of timber encroaching on grassland and removal of weeds. The view that wide scale land clearing is destroying the environment is false and misleading, and causing much harm to producers trying to provide high quality food and fibre to our state and beyond.

24. For the Government to deliver "fair laws for all Queenslanders", any amendments made must be made after an in-depth consultation process with the Agricultural Industry. The politically driven agenda to "protect the environment" through misinformation and pressure from the Greens and other organisations such as the World Wildlife fund will not deliver a fair or environmentally sound outcome for the state.

25. Landholders affected by the changes and concerned citizens have been given very little time to provide a submission to the proposed changes. Requests for an extension of time have been rejected, despite many landholders in the state still struggling with natural disasters such as drought. The amendments are considerable in length and it is very difficult to provide a detailed submission in such a short time. Regional hearings are limited, requiring many concerned citizens to travel great distances, and giving them little time to prepare submissions and organise care of their business for time to travel and be at the hearings.





26. In our business we have added to the economic prosperity of contract staff through vegetation management and provided long-term employment to at least one member of staff, thus contributing to employment needs of the state. If the Bill is introduced, we have may have no choice but to terminate this employment opportunity. If this is replicated in even a small portion of the Agricultural industry, this could in turn impact on the unemployment rate of the state heavily.

27. For producers to be able to continue to sustainable produce high-quality food and fibre they need to be able to manage vegetation practically and efficiently. The market value of food in Australian has predominantly not been aligned with the rising cost of production i.e. wages, fuel, electricity, and the cost of updating things as Vegetation Maps due to amendment changes.

28. Given that the Legislation has been changed over 18 times already since 1999, it is very difficult for landowners to make long-term plans to achieve good economic and environmental outcomes. It can also create uncertainty with banks about whether or not a loan will be an investment or a potential loss.

29. For the long-term and intergenerational sustainability of Agriculture, young people need to see that the extremely hard work involved in food production is financially and emotionally satisfying; otherwise we will need to import sub-standard food from other countries at a huge economic loss to our country.

30. One of the purposes of this Act is to regulate the clearing of vegetation in a way that allows for sustainable land use. Agricultural practices such as managing vegetation creates sustainability and seeks to provide the future generation with food, fibre and an inheritance. May this Act truly achieve this purpose in which it was set out for.

Signed:	Paul Anderson 	Janeice Anderson 
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