



Committee Secretary
State Development, Natural Resources
and Agricultural Industry Development Committee
Parliament House
George Street
Brisbane Qld 4000

1 March 2018

Re: Submission Regarding Vegetation Management and Other Legislation Amendment Bill 2018

To Whom it may concern,

Renewable Developments Australia is a renewable energy development company that is the project sponsor/proponent of the Pentland Bioenergy Project. The project involves growing of sugar cane to produce 190 Million Litres of ethanol. Currently the project has roughly 250,000 Ha under lease for the current (Stage 1) project and proposed future stages. While Stage 1 of this project will not be affected by passage of the bill, it is RDA's view that the regulatory complexity and cost of future stages will be materially increased. Our project has involved detailed approval processes which has afforded us a deep understanding of vegetation management regulation as it applies to the development of agricultural enterprise.

RDA have major concerns regarding the Vegetation Management and Other Legislation Amendment Bill 2018.

We recognise the importance of protecting vegetation, especially vegetation of high environmental value. However, we also recognised the importance of balancing these protections against the needs of the communities that are affected. Overwhelmingly the communities to which the increased regulatory burden shall apply are rural communities with economies heavily reliant on the agricultural sector.

We note with deep concern the following issues with the proposed bill:

1. At its core, the proposed changes imply that the value of "least concern" vegetation (by definition, common vegetation) has the same environmental significance as "endangered" vegetation of which very little remains, as the regulatory pathways for all vegetation clearing are essentially the same. In our view that the legislation should reflect the relative value of the asset it is seeking to protect, as it does currently.



2. The reclassification of high value regrowth and associated proposed mapping that has been released is likely to have an immediate negative impact on property values owing to the restrictions this places on future development and even maintenance of exiting agricultural enterprises. The legislation must recognise this impact and if the changes are to proceed, some compensation should be made to the affected landowners and their communities. In Particular RDA have entered into commercial lease agreements based off current legislation and current proposed changes will drastically affect our commercial viability of fulfilling our commercial obligations.
3. The removal of any avenue to clear for agricultural development (i.e. high value agriculture) other than going through a "Co-ordinated Project" pathway imposes a regulatory and cost burden that most agricultural enterprises will not be able to bear. In my experience the cost associated with a Coordinated Project is generally greater than \$2 million. These costs will greatly curtail development of the agricultural sector and is at odds with other government policies such as the stated intention to grow the biofuels sector.

It has been widely acknowledged that Queensland has a "2-speed economy" with robust growth in the south-east and regions frequently suffering high levels of unemployment and welfare dependency. In our view passage of this bill will further entrench regional disadvantage when active efforts to promote regional growth and development are desperately needed.

Kind Regards,

Tony D'Alessandro
Managing Director
Renewable Developments Australia