



Vegetation Management and Other Legislation Amendment Bill 2018

Submission from
Australian Veterinary Association Ltd



21 March 2018

About us

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife, conservation and zoo animals. Government and institution employed veterinarians work with animal health, public health and biosecurity. We also have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association. The AVA has a range of special interest groups (SIGs), allowing members with shared interests or expertise to develop their practice and skills in a specific area. These include Conservation and Biology and Animal Welfare and Ethics, Public Health, Equine and Cattle and Sheep.

Comments and recommendations

The AVA commends the Minister for Natural Resources, Mines and Energy, Hon Dr Anthony Lynham MP for the introduction of the Vegetation Management and Other Legislation Amendment Bill 2018 introduced into the Qld Parliament on 8/3/2018. We note in the Minister's introductory speech the intentions of the bill to rebalance the requirements of sustainable development which include conserving ecological processes and natural systems with land clearing for development including agricultural purposes. We wish to make comments on a number of points generally in support of this bill.

Overview

The regulation of land clearing in Australia has followed a loosely managed process of expansion driven by commercial pressures and government policy to foster development. At the time of European settlement there seemed little need for the protection of the environment but now with an estimated 90% of vegetation in eastern temperate zones removed the situation is different (Measures of Australia's Progress ABS 1370.0). The current high rates of land clearing in Queensland are an historic catch up of earlier development in NSW and Victoria.

Although this Amendment Bill 2018 seeks to restore the balance and regulate the rate of land clearing the process will continue at a lesser rate. To provide certainty for planning purposes, the AVA recommends the following.

Recommendation: That the Queensland government develop a strategic 'end-point' analysis which demonstrates when and what areas must be protected to achieve a sustainable end-point. This will ensure that sufficient critical protected habitat has been set aside before it is destroyed. Prevention is more important than remediation. These targets need to be determined on a bioregional basis.

Certainty of Landholders

We note that this amendment bill provides certainty for landholders to honour existing approvals and areas identified as Category X and the provision that current approvals have a 2-year window for completion.

Tightening of Self Assessed Clearing Provisions

The measures to regulate the self-assessed clearing permitted under the thinning, high value agriculture and irrigated high value agriculture are supported. Thinning, in particular, has a severe ecological consequence fragmenting the residual area. This is detrimental for biodiversity and delivers residual areas of a low biological value on a hectare by hectare basis.

Essential Habitat

The recognition of regrowth older than 15 years; endangered regional ecosystems; of concern regional ecosystems and of least concern ecosystems as high conservation value is supported.

Exemptions applying to Emergency & Infrastructure Provisions

The Amendment Bill ensures that emergency services and essential infrastructure are not impeded. While the importance of these provisions is acknowledged we feel that exempt emergency services and infrastructure should be required to demonstrate that reasonable steps were taken to adopt a minimal impact approach consistent with the time and practicalities of emergency services. This would be consistent with the 'avoid, mitigate, offset' framework which applies to development. "This means that in designing the development, impacts on prescribed environmental matters should in the first place, be avoided wherever possible. If impacts can't be avoided in the area, then the extent of the impacts should be carefully managed and minimised (mitigated)." (Queensland Environmental Offsets Policy (Version 1.4))

Land Management Practices

Queensland's State Policy for Vegetation Management states the need to, "Recognise that conservation of biodiversity can be achieved through responsible land management practices, including avoiding then minimising clearing of particular regional ecosystems, networks and corridors of vegetation, essential habitat, wetlands and watercourses."

Under this framework the AVA recommends the following.

Recommendation: That pre-planning be incorporated into broad acre clearing applications to ensure that the configuration of residual vegetation is such that its biological value is maximised.

Welfare

Land clearing causes the death of millions of native animals in the landscape. To the extent that these amendments reduce the death and suffering of these animals a significant welfare benefit is achieved. These welfare considerations need to be further pursued by legislative amendments that ensure that permitted land clearing carries with it a duty-of-care to mitigate death and suffering of wild animals through an adherence to acceptable codes-of-practice. Protections under the *Animal Care and Protection Act 2001* should apply. The AVA recommends the following.

Recommendation: That further consultation take place to achieve better welfare outcomes for wild animals affected by land clearing.

Summary of recommendations

- The AVA recommends that the Queensland government develop a strategic 'end-point' analysis which demonstrates when and what areas must be protected to achieve a sustainable end-point
- The AVA recommends that there should be a requirement under emergency service and infrastructure protections that these services are required to demonstrate reasonable steps were taken to adopt minimal impact approach consistent with the time and practicalities of emergency services
- The AVA recommends that pre-planning be incorporated into broad acre clearing applications to ensure that the configuration of residual vegetation is such that its biological value is maximised.
- The AVA recommends that further consultation take place to achieve better welfare outcomes for wild animals affected by land clearing

The Australian Veterinary Association commends the Minister for addressing these important issues and thanks the Queensland Government for the opportunity to comment on this strategy.

Contact details

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