SUBMISSION

My name is Helen Allen; I have a Bachelor of Science in Environmental Science and Environmental Restoration. In 2004, my husband and I purchased a 10 000 ac property northwest of Roma. I have spent the past 13 years learning the business of beef production whilst developing, renovating and restoring our property.

The most important and critical point I have learnt is that graziers/beef producers are primarily grass growers and that beef production comes secondary to that. Without grass we cannot produce beef. Managing, maintaining and improving our pastures is core to our business and its future sustainability. The amendments proposed to self-assessable codes are a direct threat to our pastures and beef production.

Retaining Self-Assessable Codes

Approximately 1100 acres of our property is classed as Category B remnant vegetation. The value of this land if we are able to maintain the thinning density rates under the current self-assessable codes is approximately $600/ac. Under the previous self-assessable codes we can maintain palatable, productive pastures and this area would be utilised by livestock and native animals alike. The annual amount of revenue from this area in an average to good season would equal approximately $40 000.

The previous density rate of immature trees per hectare for our regional ecosystem types was 70-100 immature trees to be retained in amongst mature and habitat trees. This density rate did seem to be accurate and reasonable when looking at some of the older aerial photographs of our property. That is at least one immature tree retained for every 10 m in amongst any mature or habit trees.

The new amendments would have the density rates of immature trees per hectare increase from 70 -100 to 500 immature trees per hectare. Instead of one immature tree retained per 10 m we now have to leave at least 5 in amongst mature and habit trees. When mechanically thinning in amongst timber it can be a very tight space to operate in and also has risks to the operator. Agriculture and forestry have the highest accident and mortality rates of Australian industries. Thinning effectively combines both with machinery and falling timber.

If you break down the area of operation to 10 x 10 m for simplicity; the legislation dictates that the blade on the machinery is not to go within 5 m of the base of a mature tree. The blade itself is 3 m wide. We now have to leave 5 immature trees in this 10 x 10 m area. This is not physically possible for the machinery operator to achieve. This policy has not been thought through from a practical, achievable sense.

Chemically thinning leads to dead timber and increase fuel loads that means bushfires burn very hot and kill mature/habitat trees. Using fire as a tool to thin or reduce the fuel load in winter attracts kangaroos, a tool used by aborigines to attract prey animals, and due to the explosion in their numbers the kangaroos decimate any new grass regrowth and leave the soil bare for erosion. We have experienced this first hand and over 1000 acres had to be renovated mechanically to reintroduce pasture after a lightning strike fire.

To make matters worse, the new amendments have included a trigger threshold level of 1250 immature trees per hectare. This virtual wall of timber will devalue our timbered country to next to nothing and I do not understand why a trigger threshold is required when the density of the immature trees is or is not above the recognised natural state.

Area limits

The restriction of one notification per lot and the management area of thickened vegetation to be limited to in our case being 'on ***non-coastal lots*** greater than 100 hectares' to '10 per cent of the total area of category B areas of the lot or 400 hectares, whichever is the lesser', reads as though even if the vegetation has thickened beyond its natural state the code will not allow us to thin over 10 per cent of our thickened vegetation of the total area of category B areas on that lot. In our situation 10 per cent will always be less than the 400 hectares. Therefore if I am reading this correctly we will lose 90% of productivity from that our category B areas. This measure is a further restriction on top of the new density rates and trigger threshold levels. These measures will strip approximately $600 000 from our land value and decrease our productivity by up to $40 000 per year which would otherwise go towards the cost of maintaining and improving our land. All without compensation or thorough consultation.

I understand that some of the guidelines are based on Queensland Herbarium and CSIRO advice but I would like to recommend that as this Agricultural land that landholders have paid for at a premium and not Reserve or National Park that if the government is not already doing so that their consultants include people who have extensive practical experience in the management of agricultural land as they are two very different things. This is not just about trees on the ground, it is about positive environmental outcomes (trees can deliver negative outcomes), agriculture and sustainable business. The government needs to be careful of destabilising the security of land tenure as it is usually the developing countries and countries that are dictatorships that have this issue of land tenure insecurity not developed countries.

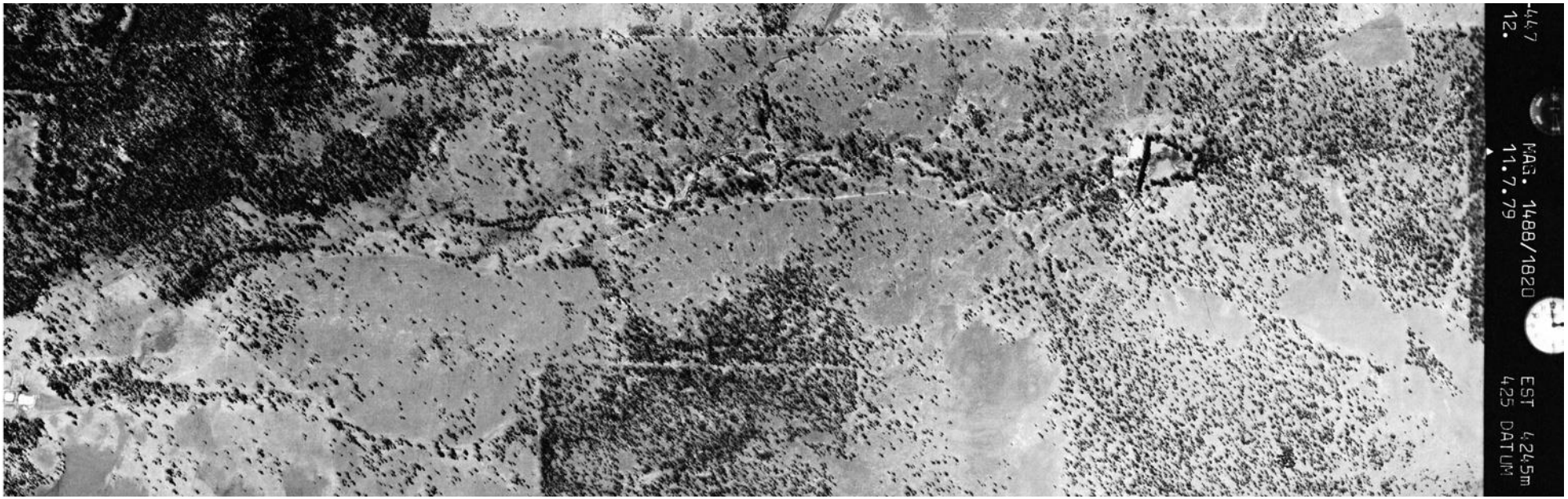

Figure 1.0 – Aerial photograph 1979. Please note that the time is 3.00pm when this photograph was taken and the darkest colour on the aerial photograph is actually the shadow cast from the trees; the tree itself is lighter. This exaggerates the vegetation density when compared to the satellite imagery.

Figure 1.1 – Satellite image 2017. Red line indicates where some thinning has been done. Blue line indicates thickening of vegetation causing lack of topsoil and erosion. Where thinning as occurred it has been done so conservatively and still seems above the density of 1979 and previous aerial photographs.

On the 8th May, 1846, when early explorer Sir Thomas Mitchell entered our region he exclaimed, *"I rode over towards an elevated part of the open downs, in hopes to obtain a sight of what the country was beyond, but I found that to be impossible, as it seemed boundless. So, turning, I ascended an elevated north-eastern extremity of Mount Abundance, and from it beheld the finest country I had ever seen in a primaeval state. A champaign region, spotted with wood, stretching as far as human vision, or even the telescope, could reach."*

In this case the term 'champaign' is used to describe an expanse of level open country however there are instances where the meaning or definition of terminology used by the early explorers do not have the same meaning as they do now. For example, in Bill Gammage's book 'The Biggest Estate on Earth, how aborigines made Australia' he mentions how "in Leichhardt's time people called 'forest' what we might call woodland, or even grassland. The Australian National Dictionary offers: 'Forest *Obs[olete]* A tract of open, well-grassed land, with occasional trees or stands of trees'" (p. 75).

In a later account from Sir Thomas Mitchell's 'Journal of an Expedition into the Interior of Tropical Australia' his view over our property from Mount Bindango, which our property neighbours, was as follows "11TH May. - Open downs surrounded the mountain. Beyond these, valleys, also clear of trees, or thinly wooded, fell on one side to the S. E., on another side, other valleys fell to the N. W., leaving a rather elevated tract between; which appeared to connect this mountain with a range just dimly visible, bearing nearly north. The valley descending towards the N. W., seemed to me to be the head of a river likely to pass through a remarkable gap in a flat range, beyond which the view did not extend. To the westward a woody, and rather level country appeared, from which I thought I saw ridges, with plains or downs between them, descending towards the N. W. river."

From this account it is hard to reconcile even the earliest aerial photographs of our property to the description given above in 1846 when the Aboriginals where managing the land with fire to not only hunt but also landscape the vegetation to their advantage. It was also a time when the landscape was able to carry fire from lightning strikes large distances without interference. In my opinion, a lack of vegetation management has lead to a landscape of vegetation that is very different to that of pre-settlement.

Landholders thin vegetation to manage vegetation thickening. Thickening is the process whereby the density of the trees and woody shrubs increases in the landscape. We choose to thin our thickened vegetation mechanically as an alternative to fire. Aborigines previously used fire to manage the landscape but by using mechanical methods we can be more selective in what is thinned and unlike a burnt landscape it will not attract kangaroo overgrazing. It is necessary to thin thickened vegetation to:

1. To protect our workers, livestock and animals. Thinning makes it easier to move livestock in a safer, calmer and more manageable way. This is not only for the livestock's welfare but also the welfare of the horses, working dogs and stock hands that muster them. In enclosed timbered environments livestock resist handling and can break away at high speeds forcing stock hands and dogs to risk themselves to stop them. Trying to stop 500 kg animals at speed whilst dodging trees, logs and uneven ground at speed is not safe for any party involved and the safety of our livestock, workers and animals is our highest priority.

2. Reintroduce grass into the understory where the thickened vegetation excluded it from the ecosystem. This is also beneficial to native animals.
3. Reduce erosion of the topsoil due to a loss of ground cover from thickened vegetation.
4. Maintain and/or improve the value of the land.
5. Maintain and/or improve carrying capacity.
6. Drought proofing.

Figure 1.2 - Thinned vegetation with new pasture seed planted

Figure 1.3 - Thickened vegetation

"The best environmentalist is a viable primary producer."

There will be an environmental cost to this policy. Timber that has thickened beyond its natural state leads to erosion, poorer water quality in the creeks and rivers due to topsoil erosion which in some catchments the outcomes will go against what the government is trying to achieve as the poorer water quality will negatively impact on the Great Barrier Reef.

The majority of native animals such as potoroos, wallabies, bustards, reptiles such as shingle backs, blue tongues and goannas are not abundant in densely timbered areas. There is not the food for them in heavily timbered ecosystems, there is little to no grass or the grass is very poor and unpalatable. Insects that reptiles and birds live on are not prolific in densely timbered environments. Prey animals do not like to be in heavily timbered area as they are more open to ambush by wild dogs, foxes and cats. These environments are devoid of native fauna in comparison to grassed open to semi-open woodland and tend to be a habitat for feral animals such as pigs.

These amendments to the Vegetation Management Act is a policy based on a political agenda by the Labor Party to keep a election promise that secured the Green Party's preferences. The real impact, the cost to the environment and the landholders appears to be seen as collateral damage necessary to retain government. It is disappointing to say the at the very least, that a minority party such as the Greens who have one sitting MP elected and only 10% of the primary vote are able to directly impact the entire agricultural sector of Queensland.

The majority of Green Party Supporters live in urban environments and most have little or no physical contact with agriculture accept for the fact that they do eat food that we produce. Queensland agricultural industries contributes more than $10 billion to the state's economy every year and is made up by more than 30,500 businesses. Agriculture supports and is the lifeblood of the majority of small Queensland towns.

Populous politics has unfairly depicted the landholders as being the villains of the environment and animal welfare. Towards the end of the 1700s and into early 1800s, kangaroos were thought to be uncommon and at risk in some areas of becoming extinct due to hunting for the fur/skin trade and also for meat. We now have over 44 million kangaroos due to our pasture improvements and water infrastructure improvements. A large number of native animals have benefited from agriculture especially in the rangeland environment. Wetland birds are major beneficiaries of the numerous dams built throughout Queensland.

There would be a number of native animals that are greater in number than in pre-settlement times due to grassland developments and improvements. Yes; some animals have declined due to change of habitat, changes to burning off; introduced animals such as foxes and cats but many of those factors cannot be blamed on landholders today. Many landholders are well informed; university educated or have higher level of industry experience and are doing good environmental works with the help of community groups like Land Care and industry groups with best practice agricultural workshops.

Personally, we have more thinning of thickened vegetation to do but due to our current pasture development and renovation project we have not accomplished this. We would like to maintain the density of 70-100 immature trees retained per hectare in the timber we have thinned to maintain its carrying capacity and reduce erosion. I believe this is the closest density rate (that was set by the previous government and their consultants) to the description of the landscape by Sir Thomas Mitchell as he traversed our country. A density rate of 500-1250 immature trees per hectare seems to be a number that is very much beyond what early explorer accounts and aerial photographs suggest and show.

Figure 1.4 – Satellite image 2017. Please note the amount of seedlings and immature trees that we have left in the previously cleared Category X areas.

Changing and introduction of new vegetation categories

Of extreme concern to us is that the government will find a way to change Category X to another form of which they will have control of any vegetation we have left on our previously cleared land in a way to meet their targets for international treaties relating to climate change. This will be at landholders expense without compensation. With this in mind, is it in our best interest to clear much of our Category X country to prevent it from being rendered unproductive and an environmental burden should the government change the legislation on Category X areas retrospectively in the future. Once again, this legislation is not good policy as it fails to encourage better land management. Please note on Figure 1.4 the amount of seedlings and immature trees that we have left in the previously cleared Category X areas. We do like trees but in the right numbers and densities so that we can grow our pastures that sustain not only our livestock and livelihoods but also healthy ecosystems which can support both livestock and healthy native animal populations.

Increasing compliance measures and penalties under vegetation management laws.

Also of concern to us is that fact that government policy is continually shifting and changing in the political populace winds and we are uncertain what future decisions regarding vegetation we should take and if the government can retrospectively prosecute us for something that at the time was legal. We have no confidence that the legislation at the time can protect us especially if there is to be a reverse onus of proof amendment passed followed by a tripling of penalties.

It has been pointed out to landholders that the Bill potentially breaches fundamental legislative principles (FLPs) as outlined in section 4 of the Legislative Standards Act 1992. Legislation should have sufficient regard to the rights and liberties of individuals and consequently should not adversely affect rights and liberties, or impose obligations, retrospectively. This Legislation may make criminals of law-abiding landholders.

It is not easy to apply vegetation stem counts, GPS co-ordinates, vegetation codes and for the machinery operator to get it right without mistake at any one of those levels. Landholders need assurances that they will not be prosecuted for genuine human error. Some of these fines go beyond those being applied to other more serious and sinister criminal penalties.

The self-assessable codes need to remain unchanged, as do the density rates of the immature trees to be retained for us to manage our land in a productive and environmentally responsible manner. The new density rates for our regional ecosystems are unworkable under the proposed legislation. Individuals and companies who deliberately breach the conditions of self-assessable codes should be penalized not the industry as a whole with these new amendments to self-assessable codes.

Signed:	
Address:	[redacted]
Date:	22/03/18