

**VEGETAION MANAGEMENT AND OTHER LEGISLATION AMENDMENT BILL
2018**

SUBMISSION TO:

**STATE DEVELOPMENT, NATURAL RESOURCES AND AGRICULTURAL
INDUSTRY DEVELOPMENT COMMITTEE.**

Parliament House

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EXECUTIVE SUMMARY

The VMOLA Bill, 2018 reflects a government shackled by the extreme green vote, a Government succumbing to the power centric aspirations of persons whose livelihoods are totally independent of vegetation management outcomes, and a Government that has failed abysmally to reach out and consider the views of farmers who produce primary wealth for this State and whose job it is to manage vegetation throughout the State.

I am totally opposed to the VMOLA Bill, 2018 for the following reasons:

- This Bill totally ignores the needs for landholders to manage their land for both productivity and environmental gains
- Efforts by landholders to find a better way to manage vegetation have been deemed irrelevant. The purest scientific approach that forms the basis of this Bill completely ignores land productivity issues.
- As it is presented this Bill ignores the imperative need to bring stability to vegetation management through good legislation, i.e fair and equitable legislation, that allows for long term planning and environmental gains.
- This Bill seriously impedes agricultural development.

This Bill totally ignores the needs of landholders to manage their land for productivity and environmental gains.

Amendment of s 190 / Insertion of new s19S / Replacement of pt 2, div 5B.

The purest scientific view in the Queensland Herbarium report “ Science supporting revision of codes for self-assessed vegetation thinning and fodder harvesting in Queensland” (the QH Report), and the supporting CSIRO review of the QH report (CSIRO Report) have a total disconnect with a landholder’s need to keep his land productive.

The CSIRO Report claims that it is beyond landholders to assess their country :

*“the nature of the assessments which would need to be done, particularly in relation to the Managing Thickened Vegetation SACs, **are too complex for a landholder** to be expected to perform if the aim of the SACs are to ensure clearing does not result in land degradation, loss of biodiversity, or the disruption of ecological processes. “*

(CSIRO: Review of Science supporting revision of codes for self-assessed vegetation thinning and fodder harvesting in Queensland).

Landholders may not witness thickening events one hundred year apart, but they do witness the impact of their management activity on the land, and in places vegetation has become thicker than it was in the past. This is a fact (despite the acknowledge deficiencies in SLATS data). Excessive vegetation degrades land. To maintain a healthy landscape that permits a viable enterprise on land that is being degraded by thickening vegetation, the vegetation needs to be managed by thinning.

Given the Government’s ability to monitor vegetation management activity in almost real time, this Bill that will place Managing Thickened Vegetation as a development application under the Planning Act adds an unnecessary level of cost and administration for landholders and Government; uncertainty in long term planning; and reinforces the mistrust between Government and landholders.

Area limits of 400 ha within which managing thickened vegetation can occur in non-Coastal regions and Lot limits for fodder harvesting with 10 year intervals between harvest events give no consideration to on ground land productivity issues.

Efforts by landholders to find a better way to manage vegetation have been deemed irrelevant as a purest scientific approach that completely ignores land productivity issues forms the basis of the Bill.

Replacement of pt 2, div 5B (Area Management Plans) / New Section 136

Despite the admission by QH that :

*“Several potential ways to identify areas where substantial thickening had occurred were recommended. Initially we suggested a **comparison of aerial photographic imagery** (historic and recent) be made, and density of count of trees from both sets of imagery to provide evidence of tree thickening. A method along these lines was developed by the QH and **we have confidence in its utility** (Fensham and Fairfax 2007, Fensham 2008b). This method was utilised for assessment of applications to thin prior to the self-assessable code (under the Regional Vegetation Management Codes RVMC), but this suggestion was rejected after discussions with DNRME and stakeholders, as it was considered impractical for landholders to implement.” (the QH Report)*

and discussions between AgForce and the QH the new and innovative Baseline Area Management Plan (BAMP) concept has been ignored by the Government.

Critically BAMP provides the following way forward for vegetation management in Queensland:

- Landholders have long experienced that ecological health and effective primary production are co-dependent in a managed grazing system, with ecosystem services and biodiversity fundamental to sustainable tree-grass-native flora/fauna-stock densities.
- The vegetation management *outcome* for a landholder is defined, known, and documented and agreed to by the State and Landholder.
- The vegetation management *activity* to achieve the outcome is outlined, known, and documented and agreed to by the State and the Landholder.
- PMAV and AMP negotiations conducted in good faith should cultivate a sense of trust (greatly lacking now due to vegetation management being a long-term political football) between State and landholder. With trust comes confidence, long term planning certainty, reduced administrative cost for Government, better and more sustainable environmental outcomes, and better land management leading to more profitable outcomes for landholders.
- BAMP has been developed by landholders (with skin in the game) to maintain or reinstate the balance between ecological health and land

productivity only to where it currently is, or was in the past, with commensurate tree distributions and densities.

- In different bio-regions or areas, the use of a template specific to vegetation mixes will improve consistency and simplicity, as well as greatly reducing the need for large DNRM costs with one-by-one applications and assessments.
- Local Queensland Government staff will add value to the preparation of BAMP applications and assessments (e.g. DAF staff that have localised experience).
- Nothing is being invented or imagined in the BAMP process.
- Easy to monitor using EDS and to audit against agreed parameters.
- The BAMP approach is consistent with current Encroachment Clearing SAC or ADVC code.

The BAMP process is dependent on Area Management Plans remaining operative in the legislation, and NOT being replaced with Accepted Development codes.

This Bill ignores the imperative need to bring stability to vegetation management through good legislation that allows for long term planning and environmental gains.

Amendment of s190 (Accepted development vegetation clearing code)

In this Bill Area Management Plans (AMPs) are due to be phased out by 2020, the reason being that Accepted Development Vegetation Clearing codes will provide sufficient guidelines for low risk clearing activities. However, it is at the Ministers discretion whether a code will even exist : “...*the power to make an accepted development vegetation clearing code will be **made discretionary** for all activities.*”

(VMOLA Bill 2018, Explanatory Notes)

Despite the past efforts by landholders and regional Departmental staff to develop AMPs to tailor make vegetation management to suit particular landscapes this Bill makes a one size fits all accepted development code, if it exists, set the guidelines for vegetation management across the State.

Post 2020 if no accepted development code exists landholders will be forced to act through the accepted development planning process under the Planning Act. This is a massive disruption to management operations and a massive increase in cost to landholders and to the Government. It was for this very reason of cost, that Self Assessable Codes (now Accepted Development Vegetation Clearing codes) were introduced.

If the new Accepted Development Vegetation Clearing Codes for managing thickened timber and for fodder harvesting introduced as interim codes with this Bill

are a forerunner to what is to come, when, and if, the Minister uses his discretion to create an accepted development vegetation clearing code, or to set the requirements for development approval under the Planning Act, then new vegetation management legislation will be unacceptably confusing, expensive, and impractical.

Vegetation management legislation needs to get off the political cycle rollercoaster, and settle where land productivity and environmental protection are in balance. Good, fair, equitable and stable legislation that embraces a landholder's need to maintain a productive land base is required.

This Bill seriously impedes agricultural development.

Amendment of s22A (Particular vegetation clearing applications may be assessed)

The need for agricultural development is well documented and supposedly supported by this Government.

This Government should be well aware of the methodology put forward to stage develop any High Value Agriculture (HVA) or Irrigated High Value Agriculture (IHVA) project greater than 5000 Ha in area.

By staging the development each cleared area is "proved up" before the next area is cleared for cultivation. Proving up is defined as the outcome of establishing, cultivating and harvesting a crop.

By staging the development of HVA/IHVA the right land use, the right landscape and the right design for agricultural development is ensured.

Moreover, with a responsible yet workable policy for large scale HVA, all small (below 5000Ha) HVA proposals can happen bringing development benefits to the State, without damaging the environment.

Conclusion.

The Vegetation Management and other Legislation Amendment Bill, 2018, will work against landholders, not with them, and needs to be defeated in Parliament.