

Dear Secretary to the Committee

My name is Edward Fensom President Wildlife Logan, Coordinator of Brisbane Region Environment Council, and a long term member of the SLATS Committee(DSITI).and part of SEQB South panel for the Biodiversity Planning Assessment of SEQB 2016

I wish to support the Vegetation and Other Amendment Bill 2018, but with some alterations to the Bill, regulations and the mapping, and additions to the dictionary and glossary.

There is little about the implications of Climate Change on the status of vegetation in Queensland. It appears the central and western landscapes could get 2-4 degrees hotter in a short period ,but there is little about the lesser amount of terrestrial water in central and western landscapes. Implications of further land clearing on decreasing future rainfall appears taken as read, but perhaps it is not sub regionally qualified.

One nexus is whether all Remnant and High Value Regrowth Vegetation and all koala habitat is currently mapped in all the Legislative Maps and will be protected. As this is apparently not currently and adequately mapped (some Essential Koala Habitat /koala habitat and new High Value Regrowth missing) this presents problems of; fact ; consultation ,timing of delivery of maps and meaningful delivery of purposes of the Act and a better dictionary.

With the probable continuation of ;Thinning ,Fodder harvesting , Forest Logging , Coastal Clearing, Exemptions and Offsets then Other Important Vegetation Mapping Classes which are smaller, with multiple more discrete values including scientific ,reserve system and ecotourism values and should be mapped and put in the Glossary, Dictionary and protected in the body of the Act. The vegetation in Category X and PMAVs and 70,000ha Urban Footprint Vegetation and forest logging permits or notifications have other landscape ,public interest & climate change values.

**Other Vegetation** There remains to be released a series of vegetation information outside SLATS Reports and up front Agencies Mapping which should be collated and published . . Only some of these may be mapped and field assessed in coastal Bioregions or referenced in the DRAFT Biodiversity Conservation Prioritisation Framework 2016 (EHP) for SEQ. Some need updated monitoring, mapping and definitions. Some of these which could be degraded or largely disappear include ;

Refugia

Koala Habitat Essential Habitat

Old Growth Woodlands and Forests ( see RFA SEQB 1998), WWF Platform unprotected Rainforest and Dry Scrubs(some Herbarium Mapping , Vine Forest Atlas SEQ), Wet Sclerophyll Forests

Groundwater Dependent Ecosystems(GDE mapped by EHP),

Regional Biodiversity Values (SEQ Regional Plan 2017 DILGP).

Biodiversity Hotspots (SEQB RFA /LGA Mapping /Williams et al 2011, B.P.A.s,)

Bioregional Corridors mapped in each Bioregion by DES,

Climate Change Refugia

There are classes of vegetation designated as Climate Change Refugia supposed

to be mapped in 2000. The Climate Change Unit (DES) has indicated Refugia Mapping as a future project. In this arena are Bioregional Corridors mapped in EPA/DERM/ EHP Biodiversity Planning Assessments 2007-on exist for Each Bioregion. Some of these under the Offsets Act SOIC mapping require collation to test values of Climate Change Corridors.

#### Koala Habitat

There is a wide community expectation that after the WWF Report that projections that Broad scale Land clearing kills 1300 Koalas a year in Qld , that new legislation would change the legislation and close loopholes in the Act , the Bill and the mapping. The State Government Statistics reveal that another 1,000 koalas die prematurely in SEQ and 75% or higher percentage presented to vets and koala hospitals die or are euthanized from a range of downstream causes after land clearing and severance of habitat in SEQ. The last clearing figures available appear to be 7,000 ha /year for SEQ UF but much of these and what is being lost 2016-18 are koala habitat and corridors and biodiversity hotspots and likely to spatially increase. The specific clauses, adequate mapping and definitions to stop Koala Habitat clearing and logging and other biodiversity and fauna protections (Finn and Stevens) are missing in the Bill.

#### Some Mapping Implications

1. The clauses in the Bill , and probability of continuance of ; more exemptions ,more thinning ,more offsets and more forest(logging) practices in Eucalypt Of Concern, Not of Concern Regional Ecosystems and High Value Regrowth warrants koala habitat protection in woodlands and East Coast Forests(Williams et al 2011). There are a range of instructed koala reports in South East Queensland Councils which have worthwhile and fundamental facts but incomplete mapping. These have unfortunately inadequate outcomes due to ;mapping ,PDAs .Urban Footprint Jump outs(20,000ha in 2017) and SEQ Regional Plans/rolling Planning Schemes.

2.The legislated 2018 Essential Habitat Mapping and Essential Koala Habitat Mapping **does not include High Value Regrowth** (2010) (pers com Steven Howell DES).

Examination of the Essential Habitat Meta data description. indicates

- it has limited updates from 2010 and
- it has no attributes of High Value Regrowth. The Essential Habitat Metadata Purpose states "The proposed essential habitat no attribute map is a map certified by the chief executive showing the proposed essential habitat no attribute areas over proposed high value regrowth."
- The Regulatory Map with the legislation indicates High Value Regrowth which appears to be the 2010 mapped Regrowth (going back to 1989). There does not appear to be a 15 year old regrowth layer mapped by DNRME undertaken although EHP list a WNR 2013 Woody Non Remnant map?
- It also has out of date koala habitat mapping (2010) from the State Koala Plan 2017.

- The Essential Koala Habitat Mapping may not include 70,000 ha of Urban Footprint Vegetation half remnant half regrowth or in koala habitat areas in SEQ Regional(rural) Councils(Somerset, Scenic Rim and western Sunshine Coast) not in State Koala Plan maps gazetted in 2017..

### **High Value Regrowth Values**

Healthy Land and Water (previously SEQ Catchments) has undertaken Koala Studies for some Coastal Local Authorities (Sunshine Coast Regional Council and Noosa Council etc.) using 5 data bases indicating about 50% of koala population exist in High Value Regrowth.

The Ministers speech indicates that the High Value Regrowth mapping will have to be undertaken later. The original Regrowth Mapping in 2010 was based on 1989 regrowth baseline

The upgrading of this mapping needs staffing and resources across several agencies. The use of scat dogs and drones are substitute methods of koala habitat assessment and koala observation, which have gaps and inaccuracies. Koala habitat modelling and " elicit processes" and the Common Assessment Method (EPBC Act) are highly suspect and unscrutinised methodologies used in NSW and Qld. The EHP instructed SEQ Koala habitat Study by Uniquist in 2015 does not appear to have progressed Koala Habitat modelling as a viable or ethical alternative.

3. There appears to be a lack of regulations in this Bill inserted into the Planning Act to protect Threatened Species particularly inside the Urban Footprint. . This affects koala habitat in Central Qld and Coastal Qld. While Essential Habitat is there, it appears to have large gaps and is warrants review and remapping.

4. Some of the mapping in places appears to be status quo and may not include proposed changes. The use of other data and other agencies appears warranted to provide translation instruments , transition documents and reports . This was undertaken by EHP (DES) in the draft Biodiversity Conservation Priorisation Framework 2016 for the SEQ Regional Plan 2017. The East Coast Forests are losing out to clearing ,logging and roading causing core area loss,, corridor severance and critical Biodiversity and Endemism Loss.

5. It is of some import that disclosure of what remnant and regrowth is left inside the white space/Category X is mapped and revealed for a range of reasons including endangered R.E.s, refugia , bioregional corridors/climate change corridors and . poor baseline mapping by Herbarium /PMAVs

6. The broader width clearing codes widths for fencing and infrastructure previously inside the VMA were about double that of Council Local Laws and for Planning Schemes These VMA criteria and codes should not override Planning Schemes, particularly in EREs and with developers cutting up Glider and Koala Habitat at Greenbank East PDA. Koala habitat should be properly mapped and protected

Thanks for the opportunity to raise these matters

Yours Sincerely.

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