

**PRIVATE FORESTRY SERVICE QUEENSLAND SUBMISSION ON:  
VEGETATION AND OTHER LEGISLATION AMENDMENT BILL, 2018.**

**From: Private Forestry Service Queensland Inc.**

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Private Forestry Service Queensland (PFSQ) wishes to make a submission to argue parts of the Vegetation and Other Legislation Amendment Bill (the Bill), 2018. The following six points have been derived from the Bill with a following argument, which aligns with PFSQ certified forest management systems.

1. to maintain codes as long as they provide appropriate protections based on Queensland Herbarium advice

A Code should be maintained on advice from respective organisations with expertise on the particular code, not just the Herbarium

2. The purpose of Queensland's vegetation management framework is to conserve remnant vegetation and vegetation in declared areas, and ensure that clearing does not cause land degradation or loss of biodiversity, maintains ecological processes, reduces greenhouse gas emissions and allows for sustainable land use. It applies to the clearing of native woody vegetation, including trees and shrubs, but not non-woody plants such as grasses.

Is Native Forest Practice (NFP) included in the state Governments definition of clearing eg. Managing a native forest practice - A self-assessable vegetation clearing code

If so PFSQ has robust data to support a claim that NFP conserves and enhances biodiversity and ecological processes. Forest management reverses land degradation and sequesters more carbon via long term storage in a broad range of high value forest products. Unmanaged forests eventually become net emitters of carbon whereas managed forests are continuously sequestering carbon.

3. Accepted development codes, which were introduced in 2013, are made by the Minister. Currently, codes exist for managing encroachment, managing a native forest practice, managing Category C regrowth vegetation,

PFSQ argues the Regrowth Code and the Managing a native forest practice - A self-assessable vegetation clearing code are not based upon sound forestry science. For example:

- There are multiple Regional Ecosystems excluded from a forest practice within the codes that are considered productive and can be managed for sustainable outcomes.
- A 'one size fits all' approach is wrong when considering sustainable forest management.
- The Regrowth code states a coastal retention rate of 300 stems per hectare. This retention rate has adverse impacts on ground cover contributing to broad scale soil erosion. Impacts on fauna - gliders can't glide in overstocked forests, poor ground cover impacts in particular on the vulnerable Bettong and other small macropods, crown development is severely reduced in overstocked forests severely reducing future hollows development critical to all hollow dependant fauna

4. In terms of remnant clearing, in 2015-16, clearing of remnant vegetation increased by approximately 21 percent to 138 000 hectares, from 114 000 hectares in 2014-15.

Clearer definitions of clearing are recommended. NFP is considered a clearing code yet NFP endeavours to retain healthy vegetation under long term management regimes. NFP is not clearing, it is long term ecosystem management.

5. The Bill will extend the protection of high value regrowth vegetation to align with High Conservation Values by:
  - Reinstating the regulation of high value regrowth on freehold land and indigenous land (removed in 2013) and occupational licences (not previously regulated) by including these areas in Category C;

What is the definition of high value regrowth vegetation? Is there a foliage projective cover limit, a certain suite of species?

6. Stakeholders are divided on many aspects of the Bill. AgForce, Queensland Farmers' Federation are concerned about impacts of the changes to the vegetation management framework on the development of agricultural industries. The conservation sector supports the Government's commitment to end broadscale clearing.

PFSQ believes that NFP is an optimal ecosystem management tool with focus on long term production and habitat retention with added downstream benefits of reductions in erosion through increases in groundcover.

Regards,

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