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State Development , Natural Resources  
and Agricultural Industry Development Committee  
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**Submission on Vegetation Management and Other Legislation Amendment Bill 2018**

21 March 2018

Dear State Development, Natural Resources & Agricultural Industry Development Committee,

As a resident of Qld for the past three years, as a botanist with a Masters in Wildlife Management, and involved in flying-fox and other bat conservation, as a Visitor Centre volunteer, as an interpreter and guide in training for the Wet Tropics, I am concerned about the amount of native vegetation clearing in this state. Queensland, particularly my region in the World Heritage Listed Wet Tropics, has the highest biodiversity in Australia including the most oldest living rainforest. Yet areas of rainforest in the Daintree have to be “bought back” by the community from developers to create conservation and wildlife connectivity and corridors to conserve this incredible biodiversity. Vegetation is cleared for residential development (small and large) and for agriculture throughout Queensland, and urban trees have no protection. In southern states, permission is needed to clear significant trees (over a certain size) in urban areas and on rural properties. In my beautiful village- Kuranda, Village in a rainforest- we are losing trees to bull-dozing every day, changing our character and affecting our tourism values and our natural values, and impacting on our native wildlife.

Nearby, vegetation clearing (for agriculture expansion or other development) is affecting winter foraging species that the Vulnerable Spectacled Flying-fox depends upon, a major causal factor in the 5 – 6% annual decline of this species, and contributing to urbanisation of flying-foxes and human- flying-fox conflict, and affecting the species’ capacity to pollinate and spread seeds of the World Heritage listed rainforests.

This vegetation clearance particularly in riparian areas increases erosion and silt deposition onto the World Heritage listed Great Barrier Reef.

The extent of vegetation clearing in Qld is now known internationally to exceed that of Brazil. Clearly vegetation needs to be protected. This bill is an excellent first step in reducing the state’s deforestation and tree clearing crisis.

I wish to express my support for the passing of Vegetation Management and Other Legislation Amendment Bill 2018, but I wish to see some amendments to the Bill to strengthen it as I am concerned that excessive clearing of wildlife habitats, impacts to Reef water quality and climate change emissions may continue.

In summary, I strongly endorse the Bill in seeking to scrap high value agriculture as a relevant clearing purpose, protect high conservation value regrowing woodlands, scrap the thinning code, extend Reef riparian areas, and to terminate current Area Management Plans.

I strongly endorse amendments to the Bill to totally remove 'managing thickened vegetation' provisions, to guarantee no new self-assessable code for thinning or new Area Management Plans were possible in the future.

I am however disappointed that government is not proposing to substantially tighten up fodder harvesting provisions, including major restrictions and tying any clearing to official drought declaration.

Detailed points are given below:

I strongly support the following:

1. **Removal of the ability to obtain permits for high value agriculture and high value irrigated agriculture.** The Statewide Landcover and Trees Study found that 10% of mature bushland clearing from 2013-2016 happened under these permit types, with generally insufficient verification that the land was high value agricultural land, was needed for agriculture, and was actually utilised for the agricultural activity applied for; (*see clause 16*)

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In addition, research has found that retaining remnant vegetation on agricultural properties can improve productivity through utilising the eco-services of bats and birds in pest control. The remnant vegetation, or planting new native vegetation, provides habitat for insect eating bats and birds. The increased pest insect predation reduces the need for chemical pest control, reducing aerial and water pollution and would be particularly valuable in sensitive areas where run-off flows to the Great Barrier Reef. Substantial research on bat control and productivity of farmland has been carried out in USA, where farmers often supplement the loss of tree hollows which provide roosts for insectivorous bats with bat boxes to attract the pest eating bats. This also helps reduce incidence of mosquito borne diseases. Recent research has been carried out in NSW cotton farms showing an increase in productivity and savings. Incentives could be given to Qld farmers to trial such studies and retain remnant vegetation. This information and research may make this bill more palatable to farmers.

2. **Reintroduction of the requirement to obtain Riverine Protection Permits** to better regulate damaging clearing in watercourses (*see clauses 51 and 52*);
3. **Phasing out existing Area Management Plans** which have allowed significant clearing under lower regulation across Queensland; (*see clause 14*)
4. **Extended protections of regrowth vegetation near watercourses across Great Barrier Reef catchments, to reduce damaging runoff**, including Eastern Cape York, Fitzroy and Burnett-Mary catchments which were not protected under the VM Act currently. (*see clauses 133 and 38*)

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These will assist to reduce excessive land clearing and associated environmental impacts in Queensland.

I generally support the following, but these need to be strengthened to protect wildlife habitat, impacts to the Great Barrier Reef and to reduce emissions that cause climate change:

1. **Improved protection of ‘high value regrowth vegetation’**, being vegetation that has grown back well after being cleared. The Bill creates a broader definition, including vegetation that hasn’t been cleared for 15 years and re-extending regulation to freehold, indigenous land and occupational licences (*see clause 38*). This is strongly supported.
2. **However, ‘high value regrowth vegetation’ must be extended to fully meet the government’s election commitment by protecting high conservation value regrowth vegetation.** Extra amendments are needed to allow much more extensive protection including endangered vegetation species and communities, vegetation in reef catchments, riparian areas, threatened species habitat and areas where landscape integrity is at risk.<sup>[1]</sup>
3. **Tightening of the definition of ‘thinning’ (now known as ‘managing thickened vegetation’) is supported.** The Bill now requires that thinning activities must ‘maintain ecological processes and prevent loss of diversity’. To ensure this definition is given effect there must be a requirement that it be demonstrated prior to clearing being allowed. (*See clauses 4 and 38*)
4. **However, to truly reduce the significant clearing allowed for ‘thinning’ it should no longer be an allowable activity by permit or code, particularly not for mature and high value regrowth vegetation and under existing Area Management Plans.** ‘Thinning’ can include clearing up to 75% of a forest under current laws and has been responsible for significant clearing across Queensland without scientific justification that this is a necessary activity at all.
5. **The Bill clarifies that landholders may seek to amend their property map of assessable vegetation (PMAV) to re-regulate clearing in areas which were locked in across Queensland as not needing assessment under Newman Government laws.** This clarification is supported as helpful.
6. **However, the Bill needs to be changed to require amendment of maps that lock in unregulated clearing of all high value vegetation.** Under the Newman Government, significant areas of Queensland were locked in under property level maps which allowed the clearing of unregulated ‘category X’ even though the clearing would impact mature, high value vegetation. Leaving map amendment up to the land owner will leave significant areas of Queensland where clearing is unregulated.
7. **The Bill does not tighten excessive clearing allowed under fodder harvesting codes so amendments are needed.** Fodder harvesting should be limited to where there is an official drought declaration.

The Bill does not include the reversal of the onus of proof offence provision, nor the removal of the mistake of fact defence provisions, which were previously in the VM Act prior to the amendments by the Newman Government.

I respectfully ask that the Committee examine options for recommending changes to the Bill and codes accordingly, and to ensure that the above reforms are fully translated into practice.

Even with these reforms, I believe there will be more work needed to bring about an end to remnant clearing in Queensland, to better protect threatened species including koalas and their habitats, threatened flying-foxes and foraging and roosting habitat (needed to reduce human-wildlife conflict), other mammals and birds and to comprehensively protect native woodlands.

Yours Sincerely,

A handwritten signature in black ink that reads "Maree Kerr". The script is cursive and fluid.

Maree Kerr

<sup>1</sup>Queensland Labor, 2017 [‘Saving Habitat, Protecting Wildlife and Restoring Land’](https://www.queenslandlabor.org/media/20226/alpq-saving-habitat-policy-document-v3.pdf) Policy Document, <https://www.queenslandlabor.org/media/20226/alpq-saving-habitat-policy-document-v3.pdf>