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Email: sdnraidc@parliament.qld.gov.au

Committee Secretary
State Development , Natural Resources
and Agricultural Industry Development Committee
Parliament House
George Street
Brisbane Qld 4000

Dear Chair and Committee Members

Submission to Committee on Vegetation Management and Other Legislation Amendment Bill 2018

As Brisbane City Council's first environment officer we introduced the first vegetation controls for the City back in 1988. Back then the city was clearing 'three football fields a day' of bushland and wetlands and we convinced government that it was unsustainable and it was possible to control it and still have development.

I am disheartened and very concerned at the return of broad-scale clearing rates in the State back to the record levels we had in the 1990s prior to the Vegetation Management Act (and the panic clearing phase).

Area for area our clearing rates are higher than Brazil's which is considered a country without adequate regard for its vegetation. But we have cleared 300,000ha in 2013-14, totally senseless in this time of carbon sequestration and high rates of under-utilisation of much of our already-cleared land. Which is the rogue nation / state on vegetation protection?

We need to work with all sides of the political spectrum to make sure that the brakes are put on this runaway clearing. We can't keep changing our vegetation management framework with every change of government. It's time for scientists, environmentalists, graziers, Ag Force and government to sit down and find a workable solution. Why are we still clearing in such uncontrolled and unsustainable ways as our means of managing our beautiful, diverse multi-functional and productive Queensland landscapes?

Urgent action is needed to reinstate the Vegetation Management frameworks we had in place prior to the Newman Government.

In essence I strongly support the following elements of the VMOLA Bill:

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)*
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)*

I generally support the following amendments, however it is essential that they are strengthened by our proposed amendments to truly reduce excessive clearing of wildlife habitat, impacts to the Great Barrier Reef and climate change emissions including:

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 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.^[1]
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.

A vital matter in this process is ensuring adequate funds for the administration of the Act, and ensuring polluter / offender-pays principle applies to support this administration including mapping and ground-truthing as integral to the required level of monitoring, and enforcement and reinstatement where required.

I appreciate this opportunity to comment on the reinstatement of this essential regulatory framework for Queensland.

Yours sincerely



Mary Maher

